# IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT IN AND FOR PINELLAS COUNTY, FLORIDA

TERRY GENE BOLLEA professionally known as HULK HOGAN,

Plaintiff,

VS.

Case No. 12012447 CI-011

HEATHER CLEM; GAWKER MEDIA, LLC AKA GAWKER MEDIA; GAWKER MEDIA GROUP, INC. AKA GAWKER MEDIA; et. al.,

Defendants.	

## AMENDED NOTICE OF TAKING VIDEOTAPED DEPOSITION OF JOHN COOK

PLEASE TAKE NOTICE that, Pursuant to Rules 1.310(b)(1) and 1.310(b)(4) of the Florida Rules of Civil Procedure, Plaintiff Terry Gene Bollea, professionally known as Hulk Hogan ("Bollea") by and through the undersigned attorneys, will take the deposition testimony of the following:

**DEPONENT:** John Cook

**DATE:** March 4, 2015

TIME: 2:00 p.m. until completion

LOCATION: Merrill Corporation, 1345 Avenue of the Americas, 17th Floor

New York, NY 10105

by oral examination before a member of Merrill Corporation, or a Notary Public in and for the State of New York at Large, and or some other officer duly authorized by law to take depositions.

The deposition shall continue from day to day until completed. The deposition will be recorded by video by a videographer provided by Merrill Corporation, 1345 Avenue of the

{BC00060437:1}

Americas, 17<sup>th</sup> Floor, New York, NY 10105, and/or using instant visual display of the testimony (e.g., Live Note), as well as stenographically. Plaintiff Bollea shall bear the initial cost of the videotaping.

#### PLEASE GOVERN YOURSELF ACCORDINGLY.

DATED: January 26, 2015.

Charles J. Harder, Esq.
PHV No. 102333
Douglas E. Mirell, Esq.
PHV No. 109885
Sarah E. Luppen, Esq.
PHV No. 113729
HARDER MIRELL & ABRAMS LLP
1925 Century Park East, Suite 800
Los Angeles, CA 90067
Tel: (424) 203-1600
Fax: (424) 203-1601

Email: charder@hmafirm.com Email: dmirell@hmafirm.com Email: sluppen@hmafirm.com

-and-

### /s/ Kenneth G. Turkel

Kenneth G. Turkel, Esq. Florida Bar No. 867233 Christina K. Ramirez, Esq. Florida Bar No. 954497 BAJO CUVA COHEN & TURKEL, P.A. 100 North Tampa Street, Suite 1900 Tampa, Florida 33602

Tel: (813) 443-2199 Fax: (813) 443-2193

Email: kturkel@bajocuva.com
Email: cramirez@bajocuva.com

Counsel for Plaintiff

{BC00060437:1} 2

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by E-Mail via the e-portal system this 26th day of January, 2015 to the following:

Gregg D. Thomas, Esquire Rachel E. Fugate, Esquire Thomas & LoCicero PL 601 S. Boulevard Tampa, Florida 33606 gthomas@tlolawfirm.com rfugate@tlolawfirm.com kbrown@tlolawfirm.com Counsel for Gawker Defendants

Seth D. Berlin, Esquire
Michael Sullivan, Esquire
Alia L. Smith, Esquire
Paul J. Safier, Esquire
Levine Sullivan Koch & Schulz, LLP
1899 L. Street, NW, Suite 200
Washington, DC 20036
sberlin@lskslaw.com
psafier@lskslaw.com
asmith@lskslaw.com
msullivan@lskslaw.com
Pro Hac Vice Counsel for

Michael Berry, Esquire Levine Sullivan Koch & Schultz, LLP 1760 Market Street, Suite 1001 Philadelphia, PA 19103 mberry@lskslaw.com Pro Hac Vice Counsel for Gawker Defendants

Gawker Defendants

Barry A. Cohen, Esquire
Michael W. Gaines, Esquire
The Cohen Law Group
201 E. Kennedy Blvd., Suite 1950
Tampa, Florida 33602
bcohen@tampalawfirm.com
mgaines@tampalawfirm.com
jhalle@tampalawfirm.com
mwalsh@tampalawfirm.com
Counsel for Heather Clem

David R. Houston, Esquire Law Office of David R. Houston 432 Court Street Reno, NV 89501 dhouston@houstonatlaw.com krosser@houstonatlaw.com

/s/ Kenneth G. Turkel
Attorney

{BC00060437:1}