

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

TERRY GENE BOLLEA professionally
known as HULK HOGAN,

Plaintiff,

Case No.: 12012447-CI-011

vs.

HEATHER CLEM; GAWKER MEDIA,
LLC aka GAWKER MEDIA; et al.,

Defendants.

_____ /

NOTICE OF TAKING OF VIDEOTAPED DEPOSITION

PLEASE TAKE NOTICE, pursuant to Florida Rules of Civil Procedure 1.310(b)(6),
Defendant Gawker Media, LLC, by and through the undersigned attorneys, will take the
deposition testimony of the following:

DEPONENT: **Custodian of Records for the Law Office of David Houston**

DATE: **April 10, 2015**

TIME: **2:00 p.m., until completion**

PLACE: **Hoogs Reporting Group
435 Marsh Avenue
Reno, NV 89509
(775) 327-4460**

upon oral examination, before an officer duly authorized to administer oaths by the laws of the
Nevada, and a person who is neither a relative, nor attorney, nor counsel of any of the parties and
who is neither a relative nor employee of such attorney or counsel, and who is not financially
interested in the examination. The oral examination will be videotaped by an operator from

Hoogs Reporting Group, 435 Marsh Avenue, Reno, NV 89509, and Defendant Gawker Media, LLC shall bear the initial cost of the videotaping.

The Law Office of David Houston shall designate one or more officers, directors, managing agents or other persons to testify on its behalf on the topics listed on Schedule A.

This deposition is being taken for the purpose of discovery, and for use at trial, or both of the foregoing, or for such other purposes as are permitted under the applicable and governing rules.

Respectfully submitted,

THOMAS & LOCICERO PL

By: /s/ Gregg D. Thomas

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SCHEDULE A

INSTRUCTIONS AND DEFINITIONS

1. “You” and “your” mean the Law Offices of David Houston and David Houston, K.C. Rosser, any employees, agents, attorneys, or other persons or entities acting for or on behalf of or in concert with the Law Offices of David Houston. When documents or things are requested, such request includes materials in the possession, custody or control of your agents, attorneys or other persons acting on their or your behalf.
2. “Plaintiff” means Terry Gene Bollea (professionally known as “Hulk Hogan”).
3. “The Document Subpoenas” means the subpoenas duces tucem previously served in this litigation on, respectively, the Law Offices of David Houston and David Houston.
4. “Communications” when used herein includes letters, emails, telegrams, mailgrams, telexes, memoranda, and any other documents used to make or to record communications.

TOPICS FOR DEPOSITION

1. Your record-keeping and document retention policies.
2. Steps taken by you to respond to the Document Subpoenas.
3. The authenticity of the documents provided in response to the Document Subpoenas.
4. The authenticity of any documents produced in this litigation by Plaintiff that constitute or include communications from or to you.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 11th day of February 2015, I caused a true and correct copy of the foregoing to be served by email upon the following counsel of record:

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