

**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;
GAWKER ENTERTAINMENT, LLC;
GAWKER TECHNOLOGY, LLC; GAWKER
SALES, LLC; NICK DENTON; A.J.
DAULERIO; KATE BENNERT, AND
BLOGWIRE HUNGARY SZELLEMI
ALKOTAST HASZNOSITO KFT AKA
GAWKER MEDIA,

Defendants.

**NOTICE OF TAKING VIDEOTAPED DEPOSITION
OF CORPORATE REPRESENTATIVE OF GAWKER MEDIA, LLC**

TO:

Seth D. Berlin, Esquire
Michael Sullivan, Esquire
Alia L. Smith, Esquire
Paul J. Safier, Esquire
sberlin@skslaw.com
psafier@skslaw.com
asmith@skslaw.com
msullivan@skslaw.com

Gregg D. Thomas, Esquire
Rachel E. Fugate, Esquire
gthomas@tlolawfirm.com
rfugate@tlolawfirm.com

Michael Berry, Esquire
mberry@skslaw.com

Pursuant to Rule 1.310(b)(6), Florida Rules of Civil Procedure, Plaintiff Terry Gene Bollea, professionally known as Hulk Hogan (“Bollea”), will take the deposition by oral examination of the person or persons designated by Gawker Media, LLC (“Gawker”), at the time and location indicated:

Deponent: Corporate Representative of Gawker Media, LLC

Date and Time: April 2, 2015
10 a.m. until completion

Location: Merrill Corporation, 1345 Avenue of the Americas, 17th Floor
New York, NY 10105

This deposition is being taken 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.

Pursuant to Rule 1.310(b)(6), Florida Rules of Civil Procedure, Gawker shall designate one or more of its officers, directors or managing agents or other persons with the most knowledge to give testimony regarding the issues specified in Schedule "A" attached hereto. The deposition is being taken for the purpose of discovery, for use at trial, and for all other purposes that are permitted under the Florida Rules of Civil Procedure.

The deposition shall continue from day to day until completed. The deposition may be recorded by video by a videographer provided by Merrill Corporation, 1345 Avenue of the Americas, 17th Floor, New York, NY 10105, and/or using instant visual display of the testimony (e.g., Live Note), as well as stenographically.

PLEASE GOVERN YOURSELF ACCORDINGLY.

DATED on March 10, 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
Shane B. Vogt, Esq.
Florida Bar No. 257620
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

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 10th day of March, 2015 to the following:

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

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
pmegonigle@tlolawfirm.com
Counsel for Gawker Defendants

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

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*

msullivan@lskslaw.com
*Pro Hac Vice Counsel for
Gawker Defendants*

/s/ Kenneth G. Turkel
Kenneth G. Turkel

SCHEDULE “A”

Topics

1. John Cook’s writing and posting of the article entitled: “A Judge Told Us to Take Down Our Hulk Hogan Sex Tape Post. We Won’t,” posted at Gawker.com on or about April 25, 2013, and communications regarding same.

2. John Cook’s written and oral communications regarding the one minute forty-one second long video that was initially made available at <http://gawker.com/5948770/even-for-a-minute-watching-hulk-hogan-have-sex-in-a-canopy-bed-is-not-safe-for-work-but-watch-it-anyway>, including his communications regarding the cease-and-desist communications of David Houston and the claims in the captioned lawsuit.

3. John Cook’s observations and participation in decision-making regarding the one minute forty-one second long video that was initially made available at <http://gawker.com/5948770/even-for-a-minute-watching-hulk-hogan-have-sex-in-a-canopy-bed-is-not-safe-for-work-but-watch-it-anyway>.