## 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. 12012447CI-011
HEATHER CLEM, et al.,	
Defendants.	
	/

## **NOTICE OF CONFIDENTIAL INFORMATION WITHIN COURT FILING**

Pursuant to Florida Rules of Judicial Administration 2.420 (d)(2), Defendants Gawker Media, LLC, Nick Denton, and A.J. Daulerio, by and through their undersigned counsel, hereby certify that filed herewith are documents that may contain confidential information as described in Rule 2.420(c)(9), their Exceptions to Ruling Precluding Discovery About Media Reports Bearing On Whether The Gawker Publication Addressed Matters of Public Concern, and the Exhibits attached thereto. While Defendants filed this Notice to comply with the e-filing procedures, they have also contemporaneously filed a Motion to Determine the Confidentiality of Court Records consistent with Rule 2.420(d)(3) since Rule 2.420(c)(9) governs the type of confidential information allegedly at issue.

Dated: March 9, 2015 Respectfully submitted,

THOMAS & LOCICERO PL

By: /s/ Rachel E. Fugate
Gregg D. Thomas
Florida Bar No.: 223913
Rachel E. Fugate
Florida Bar No.: 0144029
601 South Boulevard
P.O. Box 2602 (33601)

Tampa, FL 33606

Telephone: (813) 984-3060 Facsimile: (813) 984-3070 gthomas@tlolawfirm.com rfugate@tlolawfirm.com

Seth D. Berlin

Pro Hac Vice Number: 103440

Michael Sullivan

Pro Hac Vice Number: 53347

Michael Berry

Pro Hac Vice Number: 108191

Alia L. Smith

Pro Hac Vice Number: 104249

Paul J. Safier

Pro Hac Vice Number: 103437

LEVINE SULLIVAN KOCH & SCHULZ, LLP

1899 L Street, NW, Suite 200

Washington, DC 20036 Telephone: (202) 508-1122 Facsimile: (202) 861-9888 sberlin@lskslaw.com msullivan@lskslaw.com

msullivan@lskslaw.com mberry@lskslaw.com asmith@lskslaw.com

psafier@lskslaw.com

Counsel for Defendants Gawker Media, LLC, Nick Denton, and A.J. Daulerio

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 9th day of March 2015, I caused a true and correct copy of the foregoing to be served via the Florida Courts' E-Filing Portal upon the following counsel of record:

Kenneth G. Turkel, Esq. kturkel@BajoCuva.com Shane B. Vogt, Esq. shane.vogt@BajoCuva.com\_ Bajo Cuva Cohen & Turkel, P.A 100 N. Tampa Street, Suite 1900 Tampa, FL 33602

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

Charles J. Harder, Esq. charder@HMAfirm.com
Douglas E. Mirell, Esq. dmirell@HMAfirm.com
Sarah E. Luppen, Esq. sluppen@HMAfirm.com
Harder Mirell & Abrams LLP
1925 Century Park East, Suite 800
Los Angeles, CA 90067
Tel: (424) 203-1600

Fax: (424) 203-1600

Attorneys for Plaintiff

Barry A. Cohen, Esq. bcohen@tampalawfirm.com Michael W. Gaines, Esq. mgaines@tampalawfirm.com Barry A. Cohen Law Group 201 East Kennedy Boulevard, Suite 1950 Tampa, FL 33602

Tel: (813) 225-1655 Fax: (813) 225-1921

Attorneys for Defendant Heather Clem

David Houston, Esq. dhouston@houstonatlaw.com Law Office of David Houston dhouston@houstonatlaw.com 432 Court Street Reno, NV 89501 Tel: (775) 786-4188

/s/ Rachel E. Fugate
Attorney