

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 DEPOSITION**

PLEASE TAKE NOTICE, pursuant to Rules 1.310(b)(1) and 1.310(b)(4), Florida Rules of Civil Procedure, Defendant Gawker Media, LLC, by and through the undersigned attorneys, will take the deposition testimony of the following:

**DEPONENT:**           **Jeff Anderson**

**DATES:**               **March 24, 2015**

**TIME:**                 **10:00 a.m., until completion**

**PLACE:**               **HARDER, MIRELL & ABRAMS, LLP**  
                              **1925 Century Park East, Suite 800**  
                              **Los Angeles, CA 90067**

upon oral examination, before an officer duly authorized to administer oaths by the laws of the State of Florida, 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 taken by an operator from Merrill Corporation, 1900 Avenue of the Stars, Suite 1200, Los Angeles, California 90067, and Defendant Gawker Media, LLC shall bear the initial cost of the deposition.

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

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

mberry@lskslaw.com

asmith@lskslaw.com

psafier@lskslaw.com

*Counsel for Defendant Gawker Media, LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 13th day of March 2015, I caused a true and correct copy of the foregoing to be served by email 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

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

Charles J. Harder, Esq.  
charder@HMAfirm.com  
Douglas E. Mirell, Esq.  
dmirell@HMAfirm.com  
Sarah 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) 203-1601

*Attorneys for Plaintiff*

Barry A. Cohen, Esq.  
bcohen@tampalawfirm.com  
Michael W. Gaines  
mgaines@tampalawfirm.com  
Barry A. Cohen Law Group  
201 East Kennedy Boulevard, Suite 1000  
Tampa, FL 33602  
Tel: (813) 225-1655  
Fax: (813) 225-1921

*Attorneys for Defendant Heather Clem*

/s/ Rachel E. Fugate  
Attorney