## 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.

## **NOTICE OF TAKING VIDEOTAPED DEPOSITION OF KEVIN BLATT**

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:

<b>DEPONENT:</b>	Kevin D. Blatt
DATE:	March 25, 2015
TIME:	9:30 a.m. until completion
LOCATION:	Harder Mirell & Abrams LLP 1925 Century Park East, Suite 800 Los Angeles, California 90067

by oral examination before a member of Merrill Corporation, 1900 Avenue of the Stars, Suite 1200, Los Angeles, California 90067, or a Notary Public in and for the State of California, 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, 1900 Avenue of the Stars,

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Suite 1200, Los Angeles, California 90067, 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: March 16, 2015.

/s/ Kenneth G. Turkel Kenneth G. Turkel, Esq. Florida Bar No. 867233 Shane B. Vogt Florida Bar No. 0257620 BAJO | CUVA | COHEN | TURKEL 100 North Tampa Street, Suite 1900 Tampa, Florida 33602 Tel: (813) 443-2199 Fax: (813) 443-2193 Email: kturkel@bajocuva.com Email: svogt@bajocuva.com

-and-

Charles J. Harder, Esq. PHV No. 102333 Douglas E. Mirell, Esq. PHV No. 109885 Sarah E. Luppen, Esq. PHV No. 113729 Jennifer J. McGrath, Esq. PHV No. [pending] 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

## **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 16th day of March, 2015 to the following:

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<u>/s/ Kenneth G. Turkel</u> Attorney