

Exhibit A

**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
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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.

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-and-

/s/ Kenneth G. Turkel
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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:

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/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>.