

**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 BENNETT, AND
BLOGWIRE HUNGARY SZELLEMI
ALKOTAST HASZNOSITO KFT AKA
GAWKER MEDIA,

Defendants.

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

TO:

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Michael Berry, 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 14, 2015 at 10:00 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. At the time of the deposition, the deponent is to bring all documents described in Schedule “B” 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 27, 2015

/s/ Kenneth G. Turkel
Kenneth G. Turkel
Florida Bar No. 867233
Shane B. Vogt
Florida Bar No. 0257620
BAJO | CUVA | COHEN | TURKEL

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-and-

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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 27th day of March, 2015 to the following:

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/s/ Kenneth G. Turkel
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