

**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 PETER HORAN

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:

DEPONENT: Peter Horan

DATE: April 23, 2015

TIME: 9:30 a.m. until completion

**LOCATION: Stoel Rives LLP
 900 SW Fifth Avenue
 Suite 2600
 Portland, OR 97204**

by oral examination before a member of Beovich, Walter & Friend, Congress Center, 1001 SW Fifth Avenue, Suite 1200, Portland, OR 97204, 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 may be recorded by video by a videographer provided by Beovich, Walter & Friend, Congress Center, 1001 SW Fifth Avenue, Suite 1200, Portland, OR 97204 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: April 15, 2015.

/s/ Kenneth G. Turkel
Kenneth G. Turkel
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
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 15th day of April, 2015 to the following:

Barry A. Cohen, Esquire
Michael W. Gaines, Esquire
The Cohen Law Group
201 E. Kennedy Blvd., Suite 1950
Tampa, Florida 33602
bcohen@tampalawfirm.com
mgaines@tampalawfirm.com
jhalle@tampalawfirm.com
mwalsh@tampalawfirm.com
Counsel for Heather Clem

David R. Houston, Esquire
Law Office of David R. Houston
432 Court Street
Reno, NV 89501
dhouston@houstonatlaw.com
krosser@houstonatlaw.com

Michael Berry, Esquire
Levine Sullivan Koch & Schultz, LLP
1760 Market Street, Suite 1001
Philadelphia, PA 19103
mberry@lskslaw.com
*Pro Hac Vice Counsel for
Gawker Defendants*

Gregg D. Thomas, Esquire
Rachel E. Fugate, Esquire
Thomas & LoCicero PL
601 S. Boulevard
Tampa, Florida 33606
gthomas@tlolawfirm.com
rfugate@tlolawfirm.com
kbrown@tlolawfirm.com
pmcgonigle@tlolawfirm.com
Counsel for Gawker Defendants

Seth D. Berlin, Esquire
Paul J. Safier, Esquire
Alia L. Smith, Esquire
Michael D. Sullivan, Esquire
Levine Sullivan Koch & Schulz, LLP
1899 L. Street, NW, Suite 200
Washington, DC 20036
sberlin@lskslaw.com
psafier@lskslaw.com
asmith@lskslaw.com
msullivan@lskslaw.com
*Pro Hac Vice Counsel for
Gawker Defendants*

/s/ Kenneth G. Turkel
Kenneth G. Turkel