

**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.

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

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 ("Mr. Bollea") by and through the undersigned attorneys, will take the deposition testimony of the following:

**DEPONENT:** Corporate Representative of Gawker Media, LLC  
**DATE:** June 12, 2015  
**TIME:** 9:00 a.m. until completion  
**LOCATION:** Merrill Corporation  
1345 Avenue of the Americas  
17th Floor  
New York, New York 10105

by oral examination before a member of Merrill Corporation, 1345 Avenue of the Americas, 17<sup>th</sup> Floor, New York, New York 10105, or a Notary Public in and for the State of New York, and/or some other officer duly authorized by law to take depositions.

Pursuant to Rule 1.310(b)(6), Florida Rules of Civil Procedure, the Plaintiff shall designate one or more of its officers, directors or managing agents or other persons 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, or both of the foregoing, or for such other purposes as are permitted under the applicable and governing rules.

The deposition shall continue from day to day until completed. The deposition may be recorded by video and/or using instant visual display of the testimony (e.g., Live Note), as well as stenographically. Mr. Bollea shall bear the initial cost of the videotaping.

**PLEASE GOVERN YOURSELF ACCORDINGLY.**

DATED: June 4, 2015.

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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 4<sup>th</sup> day of June, 2015 to the following:

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/s/ Kenneth G. Turkel  
Attorney

**SCHEDULE "A"**  
**TOPICS OF EXAMINATION**

1. All facts relating to the financial worth of Gawker Media LLC
2. All facts relating to any documents, including the contents of said documents, referring or relating to the financial condition or worth of Gawker Media, LLC.
3. All facts relating to any documents, including the contents of said documents, served in response to the financial worth discovery propounded by Mr. Bollea on Gawker Media, LLC on May 1, 2015.
4. All facts relating to any responses of Gawker Media, LLC, served in response to the financial worth discovery propounded by Mr. Bollea on Gawker Media, LLC on May 1, 2015
5. All facts relating to the calculation and formulation of any responses served in response to the financial worth discovery propounded by Mr. Bollea on Gawker Media, LLC on May 1, 2015
6. The record-keeping, document retention, and document preservation policies of Gawker Media, LLC and its affiliated companies, both in general and with respect to the instant lawsuit.