

**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.

**PLAINTIFF'S NOTICE OF SERVICE OF DEPOSITION DESIGNATIONS
FOR USE AT TRIAL**

Plaintiff Terry Gene Bollea, by counsel and pursuant to paragraph 16 of the Order Setting Pre-Trial Conference and Jury Trial dated February 18, 2015, hereby gives notice of serving Defendants with Deposition Designations of the following witnesses for use at trial:

1. Defendant Gawker Media, LLC's Corporate Designee, Scott Kidder
[Deposition taken October 1, 2013, and April 14, 2015]
2. Defendant Nick Denton
[Deposition taken October 2, 2013]
3. Defendant A.J. Daulerio
[Deposition taken September 30, 2013]
4. Kevin Blatt
[Deposition taken March 25, 2015]
5. Tony Burton
[Deposition taken March 2, 2015]

6. Emma Carmichael
[Deposition taken March 5, 2015]
7. John Cook
[Deposition taken April 15, 2015]
8. Andrew Gorenstein
[Deposition taken March 3, 2015]
9. Peter Horan
[Deposition taken April 23, 2015]
10. Michael Kuntz
[Deposition taken March 3, 2015]
11. Erin Pettigrew
[Deposition taken March 4, 2015]
12. Tom Plunkett
[Deposition taken March 5, 2015]
13. David Rice
[Deposition taken March 9, 2015]
14. Jules Wortman
[Deposition taken March 2, 2015]
15. Plaintiff reserves the right to limit these designations, as well as supplement them through counter-designations, to any deposition testimony offered by defendants Heather Clem, Gawker Media, LLC, A.J. Daulerio, and/or Nick Denton, with full reservation of all objections to such designations by Defendants.
16. Pursuant to the Court's rulings on April 22, 2015, and May 29, 2015, the discovery deadline has been extended for the limited purpose of financial worth discovery. Accordingly, Plaintiff reserves his right to supplement his Deposition Designations with additional testimony from the above-listed witnesses, as well as any depositions taken subsequent to the filing of this list, including but not limited to adding designations for those depositions relating to Defendants' financial net worth, which are scheduled to take place in June 2015.

Dated: June 8, 2015

/s/ Kenneth G. Turkel
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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 8th day of June, 2015 to the following:

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