

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
IN AND FOR PINELLAS COUNTY, FLORIDA

TERRY GENE BOLLEA professionally  
known as HULK HOGAN,

Plaintiff,

Case No. 12012447CI-011

vs.

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 SERVING PROPOSED JURY INSTRUCTIONS**

Plaintiff, Terry Gene Bollea, professionally known as Hulk Hogan, by counsel and pursuant to the Court's Order Setting Pre-Trial Conference and Jury Trial dated February 18, 2015, hereby gives notices of serving his proposed jury instructions. Plaintiff also submits an electronic, "clean" version of the proposed jury instructions to the Court.

DATED: June 8, 2015.

/s/ Kenneth G. Turkel

Kenneth G. Turkel, Esq.

Florida Bar No. 867233

Shane B. Vogt

Florida Bar No. 257620

BAJO CUVA COHEN & TURKEL, P.A.

100 North Tampa Street, Suite 1900

Tampa, Florida 33602

Tel: (813) 443-2199

Fax: (813) 443-2193

Email: [kturkel@bajocuva.com](mailto:kturkel@bajocuva.com)

Email: [svogt@bajocuva.com](mailto:svogt@bajocuva.com)

Charles J. Harder, Esq.

PHV No. 102333

Douglas E. Mirell, Esq.

PHV No. 109885

Jennifer J. McGrath, Esq.

PHV No. 114890

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](mailto:charder@hmafirm.com)

Email: [dmirell@hmafirm.com](mailto:dmirell@hmafirm.com)

Email: [sluppen@hmafirm.com](mailto:sluppen@hmafirm.com)

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 8th day of June, 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](mailto:bcohen@tampalawfirm.com)  
[mgaines@tampalawfirm.com](mailto:mgaines@tampalawfirm.com)  
[jhalle@tampalawfirm.com](mailto:jhalle@tampalawfirm.com)  
[mwalsh@tampalawfirm.com](mailto: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](mailto:dhouston@houstonatlaw.com)  
[krosser@houstonatlaw.com](mailto:krosser@houstonatlaw.com)

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

Kirk S. Davis, Esquire  
Shawn M. Goodwin, Esquire  
Akerman LLP  
401 E. Jackson Street, Suite 1700  
Tampa, Florida 33602  
[kirk.davis@akerman.com](mailto:kirk.davis@akerman.com)  
[shawn.goodwin@akerman.com](mailto:shawn.goodwin@akerman.com)  
*Co-Counsel for Gawker Defendants*

Gregg D. Thomas, Esquire  
Rachel E. Fugate, Esquire  
Thomas & LoCicero PL  
601 S. Boulevard  
Tampa, Florida 33606  
[gthomas@tlolawfirm.com](mailto:gthomas@tlolawfirm.com)  
[rfugate@tlolawfirm.com](mailto:rfugate@tlolawfirm.com)  
[kbrown@tlolawfirm.com](mailto:kbrown@tlolawfirm.com)  
[abeene@tlolawfirm.com](mailto:abeene@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](mailto:sberlin@lskslaw.com)  
[psafier@lskslaw.com](mailto:psafier@lskslaw.com)  
[asmith@lskslaw.com](mailto:asmith@lskslaw.com)  
[msullivan@lskslaw.com](mailto:msullivan@lskslaw.com)  
*Pro Hac Vice Counsel for  
Gawker Defendants*

*/s/ Kenneth G. Turkel*  
\_\_\_\_\_  
Attorney