

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.: 12012447-CI-011

vs.

HEATHER CLEM; GAWKER MEDIA,  
LLC aka GAWKER MEDIA; et al.,

Defendants.

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**THE PUBLISHER DEFENDANTS' NOTICE  
OF SERVICE OF DEPOSITION DESIGNATIONS FOR USE AT TRIAL**

Defendants Gawker Media, LLC, A.J. Daulerio and Nick Denton (collectively, the “Publisher Defendants”) hereby give notice of serving plaintiff Terry Bollea, professionally known as Hulk Hogan, and defendant Heather Cole with Deposition Designations for the following witnesses for use at trial:

1. Plaintiff Terry Bollea, March 6 & 7, 2014, April 9, 2015 (Clearwater, Florida)
2. Jules Wortman, April 7, 2015 (Nashville, Tennessee)
3. Elizabeth Traub, March 2, 2015 (New York, New York)
4. David Rice, March 9, 2015 (Burlington, Vermont)
5. Defendant Heather Cole, January 26, 2015 (Tampa, Florida)
6. The Publisher Defendants reserve the right to limit these designations, as well as

supplement them through counter-designations to any deposition testimony offered by plaintiff Terry Bollea, professionally known as Hulk Hogan, and defendant Heather Cole, with full reservation of all objections to any such designations.

June 8, 2015

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 8th day of June, 2015, I caused a true and correct copy of the foregoing to be served by email on the following counsel of record:

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