

**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.

**AMENDED 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 16, 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, 17th 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 9, 2015.

/s/ Kenneth G. Turkel
Kenneth G. Turkel, Esq.
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
Jennifer J. McGrath, Esq.

PHV No. 114890
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
Email: jmcgrath@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 9th 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
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*

Kirk S. Davis, Esquire
Shawn M. Goodwin, Esquire
Akerman LLP
401 E. Jackson Street, Suite 1700
Tampa, Florida 33602
kirk.davis@akerman.com
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
rfugate@tlolawfirm.com
kbrown@tlolawfirm.com
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
psafier@lskslaw.com
asmith@lskslaw.com
msullivan@lskslaw.com
*Pro Hac Vice Counsel for
Gawker Defendants*

/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.