

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. 12012447CI-011

HEATHER CLEM, *et al.*,

Defendants.

**NOTICE REGARDING TRIAL DATE AND PRE-TRIAL FILINGS AND
PRESERVATION OF ALL RIGHTS AND OBJECTIONS**

Defendants Gawker Media, LLC, Nick Denton and A.J. Daulerio (the "Publisher Defendants"), by and through their undersigned counsel, hereby give Notice of their objection to any continued application of the trial date and deadlines for pre-trial preparations set forth in this Court's February 18, 2015 order (the "February 18 Order").

As explained in the letter to the Court attached hereto, under the Second District Court of Appeal's May 7, 2015 Ruling, (a) the February 18 Order has been quashed, (b) a new order cannot be issued until jurisdiction over the setting of a trial date has returned to this Court, (c) a new order cannot be issued until defendant Kinja, KFT has answered or been dismissed. Moreover, even if those two things happen, it is too late under the rules for the trial to be reset for the original July 6, 2015 date. The Publisher Defendants, having sought clarification from both this Court and the Court of Appeal, find themselves with no choice but to object to continuing to proceed as if this case were going to trial on July 6, 2015.

In objecting to any continued application of the pretrial deadlines set forth in the February 18 Order, the Publisher Defendants expressly reserve all objections to, *inter alia*, plaintiff's proposed jury instructions and special verdict form (to which they object in whole)

and plaintiff's deposition designations (to which they object in part). The Publisher Defendants will file and serve their specific objections, deposition counter-designations, as well as their oppositions to any pending motions, in accordance with the deadlines set forth in any subsequent order setting a new trial date and accompanying pretrial deadlines.

Dated: June 15, 2015

Respectfully submitted,

THOMAS & LOCICERO PL

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th day of June 2015, I caused a true and correct copy of the foregoing to be served via the Florida Courts' E-Filing Portal upon the following counsel of record:

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