

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.

**THE PUBLISHER DEFENDANTS' NOTICE OF SERVICE OF
THEIR (1) OBJECTIONS AND COUNTER-DESIGNATIONS TO
PLAINTIFF'S DEPOSITION DESIGNATIONS AND (2) OBJECTIONS
TO PLAINTIFF'S DEPOSITION COUNTER-DESIGNATIONS**

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 the following:

1. Objections and Counter-Designations to Plaintiff's Deposition Designations, with:
 - ∑ Exhibit A: Publisher Defendants' Objections to Plaintiff's Deposition Designations of Nick Denton
 - ∑ Exhibit B: Publisher Defendants' Objections to Plaintiff's Deposition Designations of A.J. Daulerio
 - ∑ Exhibit C: Publisher Defendants' Objections to Plaintiff's Deposition Designations of Scott Kidder (Gawker's Corporate Designee)
 - ∑ Exhibit D: Publisher Defendants' Objections to Plaintiff's Deposition Designations of Tom Plunkett
 - ∑ Exhibit E: Publisher Defendants' Objections to Plaintiff's Deposition Designations of Jules Wortman
 - ∑ Exhibit F: Publisher Defendants' Objections to Plaintiff's Deposition Designations of Tony Burton

Σ Exhibit G: Publisher Defendants' Objections to Plaintiff's Deposition Designations of Kevin Blatt

2. The Publisher Defendants' Objections to Plaintiff's Deposition Counter-Designations.

June 26, 2015

Respectfully submitted,

THOMAS & LOCICERO PL

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Counsel for the Publisher Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 26th 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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