

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; 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 MOTION FOR
EXTENSION OF TIME TO EFFECTUATE SERVICE**

Plaintiff, Terry Gene Bollea, professionally known as Hulk Hogan ("Bollea") pursuant to Rule 1.070(j) of the Florida Rules of Civil Procedure hereby respectfully requests that this Court extend the time for Plaintiff to effectuate service upon Defendants, Gawker Media Group, Inc., Gawker Entertainment, LLC, Gawker Technology, LLC, Gawker Sales, LLC, Nick Denton, Kate Bennert and Blogwire Hungary Szellemi Alkotast Hasznosito KFT by an additional one hundred twenty (120) days. In support of this Motion, Plaintiff states as follows:

1. Plaintiff's Complaint was filed on October 15, 2012. Plaintiff amended his Complaint adding additional defendants Gawker Media, LLC, Gawker Media Group, Inc., Gawker Entertainment, LLC, Gawker Technology, LLC, Gawker Sales, LLC, Nick Denton, A.J.

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Daulerio, Kate Bennert and Blogwire Hungary Szellemi Alkotast Hasznosito KFT on December 28, 2012.

2. On January 2, 2013, defendant Gawker Media, LLC removed this action to the United States District Court, Middle District of Florida, Tampa Division, designated as Case No. 8:13-cv-1-T-26AEP.

3. On March 28, 2013, the United States District Court granted Plaintiff's Motion to Remand, and the case was remanded back to the Sixth Judicial Circuit Court in Pinellas County, Florida.

4. The Clerk of Circuit Court of Pinellas County received a certified copy of the Order of Remand on April 8, 2013.

5. On April 22, 2013, this Court entered an order extending service of process by 120 days from the date of entry of the order. The 120th day for service is Tuesday, August 20, 2013.

6. On July 5, 2013, Alias Summonses were issued to Nick Denton individually, Kate Bennert, Gawker Entertainment, LLC c/o its Director, Nick Denton, Gawker Technology, LLC c/o its Director, Nick Denton, Gawker Sales, LLC, c/o its Director, Nick Denton.

7. Gawker Media Group, Inc. is located in the Cayman Islands and is subject to service under the Hague Convention.

8. Blogwire Hungary Szellemi Alkotast Hasznosito KFT is located in Budapest, Hungary and is subject to service under the Hague Convention.

9. Personal service attempts have been made on Nick Denton and Kate Bennert but have been unsuccessful. Service is pending.

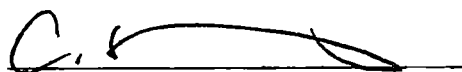
10. Service attempts on dissolved corporations, Gawker Entertainment, LLC, Gawker Technology, LLC, Gawker Sales, LLC through its Director, Nick Denton is pending.

11. Plaintiff believes this extension should cause no prejudice to any of the Defendants.

12. This motion is made in good faith and is not interposed for the purposes of delay.

Wherefore, in light of the good cause that exists because of the removal and remand of this action, translation of summons, complaint and amended complaint required pursuant to the Hague Convention and other Hague Service requirements and the ongoing investigation of accurate service locations of non-Hague defendants, Plaintiff respectfully requests that this Court enter an Order granting a 120-day extension of time to serve process on Defendants Gawker Media Group, Inc., Gawker Entertainment, LLC, Gawker Technology, LLC, Gawker Sales, LLC, Nick Denton, Kate Bennert and Blogwire Hungary Szellemi Alkotast Hasznosito KFT.

Respectfully submitted,



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-and-

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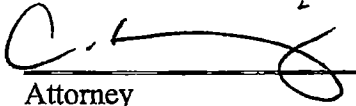
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via e-mail this 14 day of August, 2013 to the following:

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