

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

GAWKER MEDIA, LLC, *et al.*,

Defendants.

THE GAWKER DEFENDANTS' AMENDED LIST OF TRIAL WITNESSES

In accordance with the Second Order Setting Jury Trial & Pretrial Conference signed by the Court on November 19, 2015, defendants Gawker Media, LLC, Nick Denton, and A.J. Daulerio (collectively, the "Gawker Defendants"), through their undersigned counsel, hereby provide their amended list of lay and expert witnesses who are expected to testify at the trial of this case:

A. LAY WITNESSES

1. Terry Gene Bollea
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132 S. Rodeo Drive, Suite 301
Beverly Hills, CA 90212
2. Heather Cole
c/o Barry A. Cohen Law Group
201 East Kennedy Boulevard, Suite 1000
Tampa, FL 33602
3. Bubba The Love Sponge Clem
c/o Joseph F. Diaco, Esquire
5025 W. Lemon Street, Suite 100
Tampa, FL 33609

4. Nick Denton
c/o Levine Sullivan Koch & Schulz, LLP
1899 L Street, NW, Suite 200
Washington, DC 20036
5. A.J. Daulerio
c/o Levine Sullivan Koch & Schulz, LLP
1899 L Street, NW, Suite 200
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6. Scott Kidder
c/o Levine Sullivan Koch & Schulz, LLP
1899 L Street, NW, Suite 200
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7. Andrew Gorenstein
c/o Levine Sullivan Koch & Schulz, LLP
1899 L Street, NW, Suite 200
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8. Michael Kuntz
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1899 L Street, NW, Suite 200
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9. Emma Carmichael
c/o Levine Sullivan Koch & Schulz, LLP
1899 L Street, NW, Suite 200
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10. John Cook
c/o Levine Sullivan Koch & Schulz, LLP
1899 L Street, NW, Suite 200
Washington, DC 20036
11. Richard Peirce
c/o J. Armando Edmiston, Esq.
Law Office of J. Armando Edmiston
609 De Leon Street
Tampa, FL 33606
12. Jules Wortman Pomeroy (by deposition)
527 Riverside Parkway
Goodlettsville, TN 37072

13. David Houston
Law Office of David Houston
432 Court Street
Reno, NV 89501
14. Elizabeth Rosenthal-Traub (by deposition)
c/o Harder Mirell & Abrams LLP
132 S. Rodeo Drive, Suite 301
Beverly Hills, CA 90212
15. Corporate Representative of MindGeek
(*Brett Goldenberg or Jason Fischer, Esq.*)
c/o Bryn & Associates P.A.
One Biscayne Tower
2 South Biscayne Boulevard, Suite 2680
Miami, FL 33131-1815
16. David Rice (by deposition)
500 Lincoln HL
Huntington, VT 05462
17. Iv Simaku¹
c/o Levine Sullivan Koch & Schulz, LLP
1899 L Street, NW, Suite 200
Washington, DC 20036
18. Jason Shearn – Special Agent
Federal Bureau of Investigation
c/o Office of the United States Attorney for the Middle District of Florida
400 North Tampa Street, Suite 3200
Tampa, FL 33602
19. Any and all additional witnesses who may be required to rebut or impeach the testimony of plaintiffs' witnesses
20. Any and all additional witnesses who may be required to authenticate documents

¹ At the hearing on motions *in limine* July 1, 2015, the Court ruled that the Gawker defendants could not introduce Defendants Exhibits No. 271 and 316 (which contains the same video as No. 271). Mr. Simaku's testimony was to focus exclusively on those exhibits and other exhibits establishing that plaintiff had publicly disclosed the video contained in Defendants' Exhibits No. 271 and 316. In light of the Court's ruling excluding the video contained in those exhibits, the Gawker defendants will be unable to elicit the desired testimony from Mr. Simaku and therefore do not plan to call him as a witness, but have identified him here to preserve their objection to the exclusion of both the exhibits and his testimony about them.

21. Any and all witnesses identified in documents that have yet to be produced, in whole or in unredacted form, by the federal government in response to requests made pursuant to the Freedom of Information Act and this Court's order dated February 26, 2014 (affirming the Report and Recommendation dated February 5, 2014) and the order entered by the Second District Court of Appeal on August 15, 2014, which are the subject of *Gawker Media, LLC v. FBI*, Case No. 8:15-cv-01202-SCB-EAJ (M.D. Fla.)
22. Any and all witnesses whose relevance is disclosed in any subsequent discovery produced by plaintiff or his counsel or in newly identified trial exhibits
23. Any and all witnesses required to rebut the testimony of any expert witness subsequently designated by plaintiff to testify regarding financial worth

B. EXPERT WITNESS

1. Peter Horan
Horan MediaTech Advisors
3503 SW Gale Avenue
Portland, OR 97239-7206
2. Any and all rebuttal expert witnesses regarding financial worth. *See* Second Order Setting Jury Trial & Pretrial Conference ¶ 12.

The Gawker Defendants reserve their right to call as witnesses at trial any and all witnesses identified by plaintiff Terry Gene Bollea on his witness disclosures.

December 10, 2015

Respectfully submitted,

THOMAS & LOCICERO PL

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*Counsel for Defendants Gawker Media, LLC, Nick
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of December 2015, I caused a true and correct copy of the foregoing to be served via the Florida Courts' E-Filing Portal on the following counsel of record:

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