

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. 12012447CI-011

vs.

GAWKER MEDIA, LLC
aka GAWKER MEDIA;
NICK DENTON; and A.J.
DAULERIO,

Defendants.

NOTICE OF PRODUCTION FROM NON-PARTY

PLEASE TAKE NOTICE that pursuant to Rules 1,300, 1.351 and 1.410 of the Florida Rules of Civil Procedure, as well as the United Kingdom's Evidence (Proceedings in Other Jurisdictions) Act 1975 and Article 3 of The Hague Convention, Terry Gene Bollea intends, after 10 days, to present the attached Subpoenas directed to Geoffrey Denton, Adrian Wilhelm Weinbrecht and Rebecca Denton Weinbrecht, a non-party to this action residing in the United Kingdom, to an authority competent to issue a United Kingdom subpoena (or other such document having similar legal effect in that jurisdiction) with identical terms pursuant to the above cited authorities. That United Kingdom subpoena (or document) shall then be promptly served on Geoffrey Denton, Adrian Wilhelm Weinbrecht and Rebecca Denton Weinbrecht.

DATED: December 22, 2015.

/s/ Kenneth G. Turkel

Kenneth G. Turkel, Esq.

Florida Bar No. 867233

Shane B. Vogt

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-and-

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Douglas E. Mirell, Esq.
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Jennifer J. McGrath, Esq.
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Email: dmirell@hmafirm.com
Email: jmcgrath@hmafirm.com

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by E-Mail via facsimile and the e-portal system this 22nd day of December, 2015 to the following:

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Inc., WFLA-TV, Media General Operations, Inc.,
Cable News Network, Inc., Buzzfeed and The
Associated Press.*

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Attorneys for Intervenor Times Publishing Company

/s/ Kenneth G. Turkel

Attorney

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DAULERIO,

Defendants.

SUBPOENA DUCES TECUM WITHOUT DEPOSITION

THE STATE OF FLORIDA:

**TO: Geoffrey Denton
11 Oakhill Avenue
Hampstead
London NW3 7RD**

YOU ARE COMMANDED by Plaintiff to to produce for copying and inspection the documents identified in Schedule A to this subpoena to the Honorable Pamela A.M. Campbell, Circuit Court Judge, 545 First Avenue North, Room 300, St. Petersburg, Florida 33701, within twenty (20) days after this Subpoena Duces Tecum is served upon you.

In the alternative, you may mail the requested documents, for delivery prior to the deadline above, to Magnus Boyd, Esquire, Schillings, 41 Bedford Square, London WC1B 3HX, United Kingdom.

PLEASE TAKE NOTICE THAT failure to comply with this subpoena may be punishable as a contempt of Court and may make you liable to the person on whose behalf this subpoena was issued by reason of your failure to comply.

You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney, you shall respond to this subpoena as directed. You have a right to object to the subpoena under Florida Rule of Civil Procedure 1.410. You have the right to designate as Confidential any applicable document or testimony as specified under the Agreed Protective Order Governing Confidentiality, signed and ordered by the Court on July 25, 2013, a copy of which is attached hereto.

DATED on January 13, 2016.

/s/ Charles J. Harder

Charles J. Harder

For the Court

Charles J. Harder

PHV No. 102333

Douglas E. Mirell, Esq.

PHV No. 109885

Harder Mirell & Abrams LLP

132 S. Rodeo Drive, Suite 301

Beverly Hills, CA 90212

Tel: (424) 203-1600

Fax: (424) 203-1601

Email: charder@hmafirm.com

Attorney for Terry Gene Bollea

SCHEDULE A

Definitions and Instructions

As used in this Request for Production of Documents:

1. “COMPANY” means Gawker Media Limited, a UK registered company under company number 08551103, and its members, shareholders, managers, executives, officers, board members, employees, agents, representatives, attorneys, and all other PERSONS acting on any of their respective behalves.

2. “GMGI” means Gawker Media Group, Inc., a Cayman Islands registered company, and its members, shareholders, managers, executives, officers, board members, employees, agents, representatives, attorneys, and all other PERSONS acting on any of their respective behalves.

3. “TRUST” means the trust, believed to be called the Weinbrecht Family Trust, established by either Nick Denton or Geoffrey Denton, to hold certain amounts of stock in GMGI, for the benefit of the children of Rebecca Denton, with Rebecca Denton as trustee.

4. In the event any request herein calls for information or for the identification of a document which you deem to be privileged, in whole or in part, the information should be given or the document identified to the fullest extent possible consistent with such claim of privilege, and you should state the nature of the privilege claimed and specify the grounds relied upon for the claim of privilege.

5. A separate answer shall be furnished for each request.

Requests

1. The instrument establishing the TRUST.
2. The TRUST'S declaration of trust created soon after the establishment of the TRUST.
3. The TRUST'S Form 41G, as filed with HMRC.
4. The instrument initiating the transfer of GMGI stock to the TRUST.
5. The instrument establishing the appointment of Geoffrey Denton as grantor for the TRUST.
6. The instrument establishing the appointment of Nick Denton as grantor for the TRUST.
7. The instrument establishing the appointment of Rebecca Denton Weinbrecht as trustee for the TRUST.
8. The instrument establishing Ava Weinbrecht as beneficiary for the TRUST.
9. The instrument establishing Luca Weinbrecht as beneficiary for the TRUST.
10. The instrument establishing Remy Weinbrecht as beneficiary for the TRUST.
11. The income statement for the TRUST for the year ending 2014.
12. The income statement for the TRUST for the year ending 2013.
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14. The expenditure statement for the TRUST for the year ending 2014.
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16. The expenditure statement for the TRUST for the year ending 2012.
17. The tax return for the TRUST for the year ending 2014.
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19. The tax return for the TRUST for the year ending 2012.
20. The statement(s) of income received and tax paid by the TRUST in 2014, as sent to the beneficiaries of the Trust. Examples of such documents include, but are not limited to, R185 forms and Form R40.
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23. A summary of the amount of stock the TRUST holds in GMGI and the date that the TRUST acquired same
24. The stock certificates for each item of stock the TRUST holds in GMGI
25. The annual report received by the TRUST from GMGI for the year ending 2014.
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32. The instrument, dated between May 31, 2013 and May 31, 2014, which initiated the transfer of GMGI stock to the COMPANY.

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37. The instrument establishing the COMPANY's liability for each 2028 loan note as recorded as "Creditors" on the COMPANY's accounts, filed February 25, 2015.

38. The tax return filed for the COMPANY for the year ending 2014.

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THE STATE OF FLORIDA:

**TO: Adrian Wilhelm Weinbrecht
11 Oakhill Avenue
Hampstead
London NW3 7RD**

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Charles J. Harder

For the Court

Charles J. Harder

PHV No. 102333

Douglas E. Mirell, Esq.

PHV No. 109885

Harder Mirell & Abrams LLP

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Defendants.

SUBPOENA DUCES TECUM WITHOUT DEPOSITION

THE STATE OF FLORIDA:

**TO: Rebecca Denton Weinbrecht
(Possibly known as or previously named Eva Rebecca Weinbrecht or Eva Rebecca
Denton)
11 Oakhill Avenue
Hampstead
London NW3 7RD**

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