

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
IN AND FOR PINELLAS COUNTY, FLORIDA

TERRY GENE BOLLEA professionally  
known as HULK HOGAN,

Case No.: 12012447-CI-011

Plaintiff,

vs.

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

Defendants.

---

**JOINT STIPULATION TO MODIFY PRE-TRIAL DEADLINES**

Plaintiff Terry Bollea, professionally known as Hulk Hogan, and Defendants, Gawker Media, LLC, Nick Denton, and A.J. Daulerio (hereinafter, "Defendants"), jointly stipulate as follows:

1. On November 19, 2015, the Court entered its Second Order Setting Jury Trial and Pretrial Conference (the "Trial Order").

2. In order to accommodate the DVD viewing recently ordered by the Court, the parties have agreed to briefly extend certain pre-trial deadlines established in the Trial Order as follows:

a. Deadline for Supplemental Exhibit List: January 27, 2016

b. Deposition Designation Deadlines:

1. Designations: January 27, 2016

2. Objections and Counter-Designations: February 12, 2016

3. Objections to Counter-Designations: February 22, 2016

c. Jury Instructions/Verdict Form:

1. Bollea's Instructions and Verdict Form: January 27, 2016

2. Defendants' Instructions & Verdict Form: February 17,  
2016

d. Motion in Limine Deadline: February 1, 2016

e. Deadline for Mandatory Meeting of Counsel: February 25, 2016

f. Deadline for Depositions of MindGeek Corporate  
Representative and Bollea's Financial Worth Expert: February 18, 2016

WHEREFORE, the parties respectfully request that the Court enter an order approving this Stipulation and modifying the above-stated deadlines accordingly.

Dated: January 27, 2016.

Respectfully submitted,

BAJO CUVA COHEN & TURKEL, P.A

THOMAS & LOCICERO PL

By: /s/ Kenneth G. Turkel

Kenneth G. Turkel, Esq.

Florida Bar No. 867233

Shane B. Vogt, Esq.

Florida Bar No. 25760

100 North Tampa Street, Suite 1900

Tampa, FL 33602

Telephone: (813) 443-2199

Fax: (813) 443-2193

kturkel@bajocuva.com

svogt@bajocuva.com

By: /s/ Gregg D. Thomas

Gregg D. Thomas

Florida Bar No.: 223913

Rachel E. Fugate

Florida Bar No.: 0144029

601 South Boulevard

P.O. Box 2602 (33601)

Tampa, FL 33606

Telephone: (813) 984-3060

Facsimile: (813) 984-3070

gthomas@tlolawfirm.com

rfugate@tlolawfirm.com

Charles J. Harder

Pro Hac Vice Number: 102333

Douglas E. Mirell

Pro Hac Vice Number: 109885

Seth D. Berlin

Pro Hac Vice Number: 103440

Michael D. Sullivan

Jennifer J. McGrath  
Pro Hac Vice Number: 114890  
HARDER MIRELL & ABRAMS LLP  
132 S. Rodeo Drive, Suite 301  
Beverly Hills, CA 90212  
Telephone: (424) 203-1600  
Fax: (424) 203-1601  
charder@hmafirm.com  
dmirell@hmafirm.com  
jmcgrath@hmafirm.com

*Counsel for Plaintiff Terry Gene Bollea*

Pro Hac Vice Number: 53347  
Michael Berry  
Pro Hac Vice Number: 108191  
Alia L. Smith  
Pro Hac Vice Number: 104249  
Paul J. Safier  
Pro Hac Vice Number: 103437  
LEVINE SULLIVAN KOCH & SCHULZ, LLP  
1899 L Street, NW, Suite 200  
Washington, DC 20036  
Telephone: (202) 508-1122  
Facsimile: (202) 861-9888  
sberlin@lskslaw.com  
msullivan@lskslaw.com  
mberry@lskslaw.com  
asmith@lskslaw.com  
psafier@lskslaw.com

*Counsel for Defendants Gawker Media, LLC,  
Nick Denton and A.J. Daulerio*

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27th day of January, 2016, 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:

David R. Houston, Esquire  
Law Office of David R. Houston  
432 Court Street  
Reno, NV 89501  
[dhouston@houstonatlaw.com](mailto:dhouston@houstonatlaw.com)  
[krosser@houstonatlaw.com](mailto:krosser@houstonatlaw.com)

Gregg D. Thomas, Esquire  
Rachel E. Fugate, Esquire  
Thomas & LoCicero PL  
601 S. Boulevard  
Tampa, Florida 33606  
[gthomas@tlolawfirm.com](mailto:gthomas@tlolawfirm.com)  
[rfugate@tlolawfirm.com](mailto:rfugate@tlolawfirm.com)  
[kbrown@tlolawfirm.com](mailto:kbrown@tlolawfirm.com)  
[abcenc@tlolawfirm.com](mailto:abcenc@tlolawfirm.com)  
*Counsel for Gawker Defendants*

Michael Berry, Esquire  
Paul J. Safier, Esquire  
Levine Sullivan Koch & Schultz, LLP  
1760 Market Street, Suite 1001  
Philadelphia, PA 19103  
[mberry@lskslaw.com](mailto:mberry@lskslaw.com)  
[psafier@lskslaw.com](mailto:psafier@lskslaw.com)  
*Pro Hac Vice Counsel for  
Gawker Defendants*

Seth D. Berlin, Esquire  
Alia L. Smith, Esquire  
Michael D. Sullivan, Esquire  
Levine Sullivan Koch & Schulz, LLP  
1899 L. Street, NW, Suite 200  
Washington, DC 20036  
[sberlin@lskslaw.com](mailto:sberlin@lskslaw.com)  
[asmith@lskslaw.com](mailto:asmith@lskslaw.com)  
[msullivan@lskslaw.com](mailto:msullivan@lskslaw.com)  
*Pro Hac Vice Counsel for  
Gawker Defendants*

Timothy J. Conner  
Holland & Knight LLP  
50 North Laura Street, Suite 3900  
Jacksonville, FL 32202  
[timothy.conner@hkklaw.com](mailto:timothy.conner@hkklaw.com)

Allison M. Steele  
Rahdert, Steele, Reynolds & Driscoll, P.L.  
535 Central Avenue  
St. Petersburg, FL 33701  
[amnestee@aol.com](mailto:amnestee@aol.com)  
[asteel@rahdertlaw.com](mailto:asteel@rahdertlaw.com)  
[ncampbell@rahdertlaw.com](mailto:ncampbell@rahdertlaw.com)  
*Attorneys for Intervenor Times Publishing  
Company*

Charles D. Tobin  
Holland & Knight LLP  
800 17th Street N.W., Suite 1100  
Washington, D.C. 20006  
[charles.tobin@hkklaw.com](mailto:charles.tobin@hkklaw.com)  
*Attorneys for Intervenor, First Look Media, Inc.,  
WFTS-TV and WPTV-TV, Scripps Media, Inc.,  
WFTX-TV, Journal Broadcast Group, Vox Media,  
Inc., WFLA-TV, Media General Operations, Inc.,  
Cable News Network, Inc., BuzzFeed and The  
Associated Press.*

/s/ Kenneth G. Turkel  
Attorney