

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.

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

Defendants.

FILED
ST. PETERSBURG, FLORIDA
2016 JAN 28 PM 4:21
KEN BURKE
CLERK OF CIRCUIT COURT

LETTER OF REQUEST FOR EXAMINATION OUT OF THE JURISDICTION

To the Senior Master of the Queen's Bench Division, Royal Courts of Justice, London:

I, Pamela A.M. Campbell, Circuit Court Judge in Pinellas County, Florida, in conformity with the United Kingdom's Evidence (Proceedings in Other Jurisdictions) Act 1975 and Article 3 of The Hague Convention, respectfully request the assistance of your Court with regard to the following matters.

1. Case Description:

Terry Bollea v. Gawker Media, LLC, Nick Denton and A.J. Daulerio

Case Number: 12012447-CI-011

2. Legal Representatives:

The names and addresses of the legal representatives of the parties are as follows:

Charles J. Harder, Esq.
Jennifer J. McGrath, Esq.
HARDER MIRELL & ABRAMS LLP
132 South Rodeo Dr., Suite 301
Beverly Hills, California 90212
Tel: (424) 203-1600
Fax: (424) 203-1601
COUNSEL FOR TERRY GENE
BOLLEA

Gregg D. Thomas, Esquire
Rachel E. Fugate, Esquire
Thomas & LoCicero PL
601 S. Boulevard
Tampa, Florida 33606
gthomas@tlolawfirm.com
rfugate@tlolawfirm.com
kbrown@tlolawfirm.com
COUNSEL FOR GAWKER MEDIA, LLC,
NICK DENTON, AND A.J. DAULERIO

Kenneth G. Turkel, Esq. – FBN 867233
 Shane B. Vogt – FBN 257620
 BAJO | CUVA | COHEN | TURKEL
 100 North Tampa Street, Suite 1900
 Tampa, Florida 33602
 Tel: (813) 443-2199
 Fax: (813) 443-2193
 Email: kturkel@bajocuva.com
 Email: svogt@bajocuva.com
 COUNSEL FOR TERRY GENE
 BOLLEA

Seth D. Berlin, Esquire
 Michael Sullivan, Esquire
 Alia L. Smith, Esquire
 Paul J. Safier, Esquire
 Levine Sullivan Koch & Schulz, LLP
 1899 L. Street, NW, Suite 200
 Washington, DC 20036
 sberlin@lskslaw.com
 psafier@lskslaw.com
 asmith@lskslaw.com
 COUNSEL FOR GAWKER MEDIA, LLC,
 NICK DENTON, AND A.J. DAULERIO

3. Description of the Matter:

The case before the Court concerns the publication of a video of the Plaintiff, Mr. Bollea, engaged in sexual activity, posted on the website Gawker.com (the “Gawker Website”). The Gawker Website is controlled and operated by Defendant Gawker Media, LLC, a company founded and run by Defendant, Nick Denton. Drafting of the accompanying article and the supervision of the editing and posting of the video was completed by Defendant A.J. Daulerio.

Upon a Motion requesting same, Mr. Bollea was given permission by this Court to seek an award of punitive damages against the Defendants. As part thereof, Mr. Bollea has engaged in discovery of the financial worth of the Defendants, including the assets of Mr. Denton. On Motion and oral argument, Mr. Bollea has shown this Court that he has sufficient reason to believe that Defendant, Nick Denton, transferred, directly or indirectly stock in the company Gawker Media Group, Inc. into a family trust based in the United Kingdom. Defendant Nick Denton has stated that he does not have access to the trust documents or to the stock itself. This Court has given Mr. Bollea permission to seek the information he requires from the trustees, grantors, protectors and other people involved in the operation of the trust.

4. It is necessary for the purposes of justice and for the due determination of the matters in dispute between the parties that you cause the following witnesses, who are resident

within your jurisdiction, to be compelled to produce evidence to allow the Plaintiff to best pursue the punitive damages element of his claim. The names and addresses of the witnesses are as follows:

- a. GEOFFREY DENTON
11 Oakhill Avenue
Hampstead
London NW3 7RD
- b. ADRIAN WILHELM WEINBRECHT
11 Oakhill Avenue
Hampstead
London NW3 7RD
- c. REBECCA DENTON WEINBRECHT
(Possibly known as or previously named Eva Rebecca Weinbrecht or Eva Rebecca Denton)
11 Oakhill Avenue
Hampstead
London NW3 7RD

5. The witnesses should be compelled to produce the documents outlined in the attached subpoenas duces tecum without depositions. The witnesses shall be afforded the protection of the law and procedure as outlined in the Florida Rules of Civil Procedure, and are permitted to designate any and all documents produced as “Confidential” as outlined in the attached Agreed Protective Order Governing Confidentiality entered by this Court on 25th July, 2013, a copy of which is attached to the subpoenas. This “Confidential” designation will protect the records from public disclosure without prior Court approval.

6. The documents requested are necessary to the determination of triable issues, including, without limitation, the determination of punitive damages should Mr. Bollea prevail in terms of liability and entitlement to punitive damages.

7. I request that you cause all documents produced by said witnesses to be duly marked for identification and that you will be further pleased to authenticate such documents by

the seal of your court or in such way as is in accordance with your procedure and return the documents produced to me addressed as follows:

Judge Pamela A. M. Campbell
Rm. 300, 545 First Avenue North
St. Petersburg, FL 33701

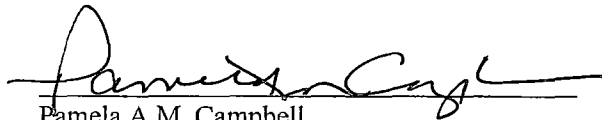
8. Alternatively, the witnesses are permitted by this Court to provide the documents directed to Plaintiff's UK-based solicitor:

Magnus Boyd, Esq.
Schillings,
41 Bedford Square,
London WC1B 3HX.

9. No examination of the witnesses, other than by the above outlined production of documents, is currently expected to take place.

DONE and ORDERED in Chambers in Pinellas County, Florida this ^{1st} ~~13th~~ day of ^{February} ~~January~~,

2016.


Pamela A.M. Campbell
Circuit Court Judge

Copies furnished to:
Counsel of Record

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
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aka GAWKER MEDIA;
NICK DENTON; and A.J.
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.
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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.
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31. The stock certificates for each item of stock the COMPANY holds in GMGI.

32. The instrument, dated between May 31, 2013 and May 31, 2014, which initiated the transfer of GMGI stock to the COMPANY.

33. The stock holder report received by the COMPANY from GMGI for the year ending 2014.

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36. The annual report received by the COMPANY from GMGI for the year ending 2013.

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.

39. The tax return filed for the COMPANY for the year ending 2013.

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aka GAWKER MEDIA;
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DAULERIO,

Defendants.

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THE STATE OF FLORIDA:

**TO: Adrian Wilhelm Weinbrecht
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.

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DATED on January 13, 2016.

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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

132 S. Rodeo Drive, Suite 301

Beverly Hills, CA 90212

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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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For the Court

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Douglas E. Mirell, Esq.

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