

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.

---

**DEFENDANTS' NOTICE OF SERVICE OF THEIR OBJECTIONS  
AND COUNTER-DESIGNATIONS TO PLAINTIFF'S  
DEPOSITION DESIGNATIONS**

Defendants Gawker Media, LLC, Nick Denton, and A.J. Daulerio hereby give notice of serving plaintiff Terry Bollea, professionally known as Hulk Hogan, with the following:

1. Objections and Counter-Designations to Plaintiff's Deposition Designations, with:
  - Exhibit A: Defendants' Objections to Plaintiff's Deposition Designations of Nick Denton
  - Exhibit B: Defendants' Objections to Plaintiff's Deposition Designations of A.J. Daulerio
  - Exhibit C: Defendants' Objections to Plaintiff's Deposition Designations of Scott Kidder (Gawker's Corporate Designee)
  - Exhibit D: Defendants' Objections to Plaintiff's Deposition Designations of Tom Plunkett
  - Exhibit E: Defendants' Objections to Plaintiff's Deposition Designations of Emma Carmichael
  - Exhibit F: Defendants' Objections to Plaintiff's Deposition Designations of John Cook
  - Exhibit G: Defendants' Objections to Plaintiff's Deposition Designations of Andrew Gorenstein
  - Exhibit H: Defendants' Objections to Plaintiff's Deposition Designations of Michael Kuntz

- Exhibit I: Defendants' Objections to Plaintiff's Deposition Designations of Erin Pettigrew
- Exhibit J: Defendants' Objections to Plaintiff's Deposition Designations of Peter Horan
- Exhibit K: Defendants' Objections to Plaintiff's Deposition Designations of Heather Cole
- Exhibit L: Defendants' Objections to Plaintiff's Deposition Designations of Jules Wortman
- Exhibit M: Defendants' Objections to Plaintiff's Deposition Designations of Tony Burton
- Exhibit N: Defendants' Objections to Plaintiff's Deposition Designations of David Rice
- Exhibit O: Defendants' Objections to Plaintiff's Deposition Designations of Kevin Blatt

February 12, 2016

Respectfully submitted,

THOMAS & LOCICERO PL

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

Seth D. Berlin

Pro Hac Vice Number: 103440

Michael D. Sullivan

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](mailto:sberlin@lskslaw.com)  
[msullivan@lskslaw.com](mailto:msullivan@lskslaw.com)  
[mberry@lskslaw.com](mailto:mberry@lskslaw.com)  
[asmith@lskslaw.com](mailto:asmith@lskslaw.com)  
[psafier@lskslaw.com](mailto:psafier@lskslaw.com)

*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 12th day of February, 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:

Kenneth G. Turkel, Esq.  
kturkel@BajoCuva.com  
Shane B. Vogt, Esq.  
shane.vogt@BajoCuva.com  
Bajo Cuva Cohen & Turkel, P.A.  
100 N. Tampa Street, Suite 1900  
Tampa, FL 33602  
Tel: (813) 443-2199  
Fax: (813) 443-2193

*Attorneys for Plaintiff*

David Houston, Esq.  
Law Office of David Houston  
dhouston@houstonatlaw.com  
432 Court Street  
Reno, NV 89501  
Tel: (775) 786-4188

*Attorney for Plaintiff*

Timothy J. Conner  
Holland & Knight LLP  
50 North Laura Street, Suite 3900  
Jacksonville, FL 32202  
timothy.conner@hkllaw.com

Charles D. Tobin  
Holland & Knight LLP  
800 17th Street N.W., Suite 1100  
Washington, D.C. 20006  
charles.tobin@hkllaw.com

*Attorneys for Intervenors First Look Media, Inc., WFTS-TV and WPTV-TV, Scripps Media, Inc., WFTX-TV, Journal Broadcast Group, and The Associated Press*

Charles J. Harder, Esq.  
charder@HMAfirm.com  
Jennifer McGrath, Esq.  
jmcgrath@hmafirma.com  
Harder Mirell & Abrams LLP  
132 S. Rodeo Drive, Suite 301  
Beverly Hills, CA 90212  
Tel: (424) 203-1600  
Fax: (424) 203-1601

*Attorneys for Plaintiff*

Allison M. Steele  
Rahdert, Steele, Reynolds & Driscoll, P.L.  
535 Central Avenue  
St. Petersburg, FL 33701  
amnestee@aol.com  
asteel@rahdertlaw.com  
ncampbell@rahdertlaw.com

*Attorney for Intervenor Times Publ'g Co.*

/s/ Gregg D. Thomas  
Attorney