

**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; A.J. DAULERIO,

Defendants.

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**PLAINTIFF'S COUNTER-DESIGNATIONS TO GAWKER DEFENDANTS'  
DEPOSITION DESIGNATIONS**

Pursuant to Paragraph 8 of the Second Order Setting Jury Trial and Pre-Trial Conference, dated November 19, 2015, Plaintiff Terry Bollea professionally known as Hulk Hogan, hereby serves his counter-designations the deposition designations served by Defendants Gawker Media, LLC, Nick Denton, and A.J. Daulerio (together, the "Gawker Defendants"). Mr. Bollea makes these counter-designations subject to, and without waiving, any subjects and objections covered by his Motions in Limine, his contemporaneously-filed Objections to Gawker Defendants' Deposition Designations,<sup>1</sup> and all objections to Gawker Defendants' Final Exhibit List, and herein reserves all rights.

**1. Counter-Designations to Deposition of Plaintiff Terry Bollea,**

**March 6 & 7, 2014, April 9, 2015**

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<sup>1</sup> Mr. Bollea makes his Counter-Designations without waiving any and all objections to the admissibility of Gawker Defendants' deposition designations, and with full reservation of his rights to limit his own designations and counter-designations for any reason, including, without limitation, court rulings.

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**2. Counter-Designations to Deposition of Jules Wortman,**

**April 7, 2015**

- Plaintiff's deposition designations for Jules Wortman
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**3. Counter-Designations to Deposition of Elizabeth Traub,**

**March 2, 2015**

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**4. Counter-Designations to Deposition of David Rice,**

**March 9, 2015**

- Plaintiff's deposition designations for David Rice
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**5. Counter-Designations to Deposition of Defendant Heather Cole,**

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**6. Counter-Designations to Deposition of Tony Burton**

- Plaintiff's deposition designations for Tony Burton

**7. Counter-Designations to Deposition of David Houston**

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Dated: February 12, 2016.

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