

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. 12012447CI-011

Plaintiff,

vs.

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

Defendants.

**PLAINTIFF'S NOTICE OF SERVING UPDATED
DEPOSITION DESIGNATIONS FOR TRIAL**

Plaintiff, Terry Gene Bollea, professionally known as Hulk Hogan, by counsel, hereby gives notice of serving Defendants, Gawker Media, LLC, Nick Denton and A.J. Daulerio, with the following:

1. Plaintiff's Updated Deposition Designations of Defendant Nick Denton For Trial,
2. Plaintiff's Updated Deposition Designations of Defendant A.J. Daulerio For Trial,
3. Plaintiff's Updated Deposition Designations of Heather Cole (formerly known as Heather Clem) For Trial,
4. Plaintiff's Updated Deposition Designations of Peter Horan For Trial,
5. Plaintiff's Updated Deposition Designations of Emma Carmichael For Trial,
6. Plaintiff's Updated Deposition Designations of Andrew Gorenstein For Trial,
7. Plaintiff's Updated Deposition Designations of John Cook For Trial,
8. Plaintiff's Updated Deposition Designations of Jules Wortman For Trial,
9. Plaintiff's Updated Deposition Designations of Kevin Blatt For Trial,
10. Plaintiff's Updated Deposition Designations of Gawker Media, LLC Corporate Designee (Scott Kidder) For Trial,

{BC00084469:1}

11. Plaintiff's Updated Deposition Designations of Tony Burton For Trial, and
12. Plaintiff's Updated Deposition Designations of David Rice For Trial.

DATED: February 24, 2016.

/s/ Kenneth G. Turkel

Kenneth G. Turkel, Esq.

Florida Bar No. 867233

Shane B. Vogt

Florida Bar No. 257620

BAJO CUVA COHEN & TURKEL, P.A.

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

Charles J. Harder, Esq.

PHV No. 102333

Douglas E. Mirell, Esq.

PHV No. 109885

Jennifer J. McGrath, Esq.

PHV No. 114890

HARDER MIRELL & ABRAMS LLP

1925 Century Park East, Suite 800

Los Angeles, CA 90067

Tel: (424) 203-1600

Fax: (424) 203-1601

Email: charder@hmafirm.com

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 the e-portal system this 24th day of February, 2016, to the following:

Barry A. Cohen, Esquire
The Cohen Law Group
201 E. Kennedy Blvd., Suite 1950
Tampa, Florida 33602
bcohen@tampalawfirm.com
jhalle@tampalawfirm.com
mwalsh@tampalawfirm.com
Counsel for Heather Clem

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
abcene@tlolawfirm.com
Counsel for Gawker Defendants

David R. Houston, Esquire
Law Office of David R. Houston
432 Court Street
Reno, NV 89501
dhouston@houstonatlaw.com
krosser@houstonatlaw.com

Seth D. Berlin, Esquire
Paul J. Safier, 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
psafier@lskslaw.com
asmith@lskslaw.com
msullivan@lskslaw.com
*Pro Hac Vice Counsel for
Gawker Defendants*

Michael Berry, Esquire
Levine Sullivan Koch & Schultz, LLP
1760 Market Street, Suite 1001
Philadelphia, PA 19103
mberry@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@hkllaw.com

Allison M. Steele
Rahdert, Steele, Reynolds & Driscoll, P.L.
535 Central Avenue
St. Petersburg, FL 33701
amnestec@aol.com
asteelc@rahdertlaw.com
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@hkllaw.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