

**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 OBJECTIONS TO GAWKER DEFENDANTS'
DEPOSITION COUNTER-DESIGNATIONS**

Plaintiff hereby incorporates by reference all of his Motions in Limine as objections to any and all deposition designations filed by Gawker Defendants, and subject to said motions, further objects as follows:

Deposition of Michael Kuntz, March 3, 2015 (New York, New York) Page: Line	Objections, If Any
127:14-128:9	Cumulative; Outside Scope
130:17-131:25	Improper Hypothetical; Relevance; Speculation
132:16-19	Improper Hypothetical; Relevance; Speculation

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Deposition of Erin Pettigrew, March 4, 2015 (New York, New York) Page: Line	Objections, If Any
98:21-101:9	Relevance; Foundation; Speculation; Cumulative
104:17-24	Speculation; Foundation; Improper Opinion; Improper Hypothetical
105:9-20	Speculation; Foundation; Improper Opinion; Improper Hypothetical

Deposition of Erin Pettigrew, March 4, 2015 (New York, New York) Page: Line	Objections, If Any
105:24-106:5	Speculation; Foundation; Improper Opinion; Improper Hypothetical

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Deposition of Jules Wortman, April 7, 2015 (Nashville, Tennessee) Page: Line	Objections, If Any
36:22-37:19	No Objection
74:20-77:04	Hearsay; Relevance; Unfair Prejudice; Speculation; Rule of Completeness
30:20-31:13	Hearsay; Relevance
58:6-59:25	Hearsay; Foundation; Relevance; Foundation
61:25-64:9	Hearsay; Foundation; Relevance; Foundation
69:25-70:12	Speculation; Relevance
77:20-78:7	Hearsay; Foundation; Relevance
78:20-79:8	Hearsay; Foundation; Relevance
82:19-83:9	Hearsay; Relevance; Authenticity; Foundation
83:14-86:5	Hearsay; Relevance; Authenticity; Foundation
86:18-21	Speculation; Relevance; Improper Opinion

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Deposition of Tony Burton, March 2, 2015 (New York, New York) Page: Line	Objections, If Any
25:20-22	No Objection
27:9-29:8	§ 934.06; Relevancy; Unfair Prejudice; Hearsay

Deposition of Tony Burton, March 2, 2015 (New York, New York) Page: Line	Objections, If Any
47:5-48:5	No Objection
52:19-53:20	Excluded by 2/17/16 Rulings; Hearsay; § 934.06; Relevance; Unfair Prejudice
56:13-23	No Objection

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Deposition of Kevin Blatt, March 25, 2015 (Los Angeles, California) Page: Line	Objections, If Any
13:4-11	Relevance
13:15-14:3	Opens Door to Expert Retention by Gawker Defendants
14:21-15:18	Conflicts with designations at 13:4-11; Improper Expert Opinion; Unfair Prejudice; Foundation
18:13-19:1	Work-Product; Opens Door to Gawker Defendants' Retention as Expert; Relevance; Hearsay; Unfair Prejudice
40:13-21	Work-Product; Opens Door to Gawker Defendants' Retention as Expert; Relevance; Hearsay; Unfair Prejudice
109:5-18	Relevance; Authenticity; Best Evidence; Unfair Prejudice; Excluded by 2/17/16 Rulings
138:9-21	Relevance; Foundation; Unfair Prejudice
217:3-10	No Objection
217:18-220:20	Opens Door to Gawker Defendants' Retention as Expert; Unreliable
221:14-222:21	Foundation; Opens Door to Gawker Defendants' Retention as Expert; Unreliable
224:18-225:2	Foundation; Speculation; Opens Door to Gawker

Deposition of Kevin Blatt, March 25, 2015 (Los Angeles, California) Page: Line	Objections, If Any
	Defendants' Retention as Expert; Unreliable
225:4-226:12	Speculation; Improper Expert Opinion; Opens Door to Gawker Defendants' Retention as Expert; Unreliable

Dated: February 22, 2016.

Respectfully submitted,

/s/ Kenneth G. Turkel

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by E-Mail this 22nd day of February, 2016 to the following:

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