

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.

HEATHER CLEM; GAWKER MEDIA,  
LLC aka GAWKER MEDIA; et al.,

Defendants.

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**DEFENDANTS' NOTICE OF SERVICE OF UPDATED  
DEPOSITION DESIGNATIONS FOR USE AT TRIAL  
WITH PLAINTIFF'S OBJECTIONS**

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:

- Defendants' Updated Deposition Designations of Plaintiff Terry Bollea with Plaintiff's Objections<sup>1</sup>
- Defendants' Updated Deposition Designations of Jules Wortman with Plaintiff's Objections
- Defendants' Updated Deposition Designations of Elizabeth Traub with Plaintiff's Objections
- Defendants' Updated Deposition Designations of David Rice with Plaintiff's Objections
- Defendants' Updated Deposition Designations of Heather Cole with Plaintiff's Objections

<sup>1</sup> Defendants have revised their deposition designations of Plaintiff Terry Bollea to remove that testimony excluded by the Court's rulings of February 17, 2016 and February 26, 2016 regarding the admissibility of the records and information relating to the FBI investigation.

- Defendants' Updated Deposition Designations of David Houston with Plaintiff's Objections<sup>2</sup>
- Defendants' Deposition Designations of Kevin Blatt with Plaintiff's Objections
- Defendants' Updated Deposition Designations of Erin Pettigrew with Plaintiff's Objections
- Defendants' Updated Deposition Designations of Andrew Gorenstein
- Defendants' Updated Deposition Designations of Michael Kuntz with Plaintiff's Objections

February 29, 2016

Respectfully submitted,

THOMAS & LOCICERO PL

By: /s/ Gregg D. Thomas

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<sup>2</sup> Defendants have revised their deposition designations of Plaintiff David Houston to remove that testimony excluded by the Court's rulings of February 17, 2016 and February 26, 2016 regarding the admissibility of the records and information relating to the FBI investigation.

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 29th 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:

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