## 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

## DEFENDANTS' NOTICE OF SERVICE OF THEIR OBJECTIONS TO PLAINTIFF'S "FINAL UPDATED" 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:

- Plaintiff's Final Updated Deposition Designations of Nick Denton for Trial with Defendants' Objections
- Plaintiff's Final Updated Deposition Designations of A.J. Daulerio for Trial with Defendants' Objections
- Plaintiff's Final Updated Deposition Designations of Scott Kidder (Gawker's Corporate Designee) for Trial with Defendants' Objections
- Plaintiff's Final Updated Deposition Designations of Emma Carmichael for Trial with Defendants' Objections
- Plaintiff's Final Updated Deposition Designations of John Cook for Trial with Defendants' Objections
- Plaintiff's Final Updated Deposition Designations of Andrew Gorenstein for Trial with Defendants' Objections
- Updated Final Deposition Designations of Peter Horan for Trial with Defendants' Objections
- Plaintiff's Final Updated Deposition Designations of Heather Cole for Trial with Defendants' Objections
- Plaintiff's Final Updated Deposition Designations of Jules Wortman for Trial with Defendants' Objections

- Plaintiff's Final Updated Deposition Designations of Tony Burton for Trial with Defendants' Objections
- Plaintiff's Final Updated Deposition Designations of David Rice with Defendants' Objections

Defendants will serve their objections to Plaintiff's Final Updated Deposition

Designations of Kevin Blatt by March 3, 2015.

March 1, 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 msullivan@lskslaw.com mberry@lskslaw.com

asmith@lskslaw.com

psafier@lskslaw.com

Counsel for Defendants

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 1st day of March, 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

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

Fax: (424) 203-1600

Attorneys for Plaintiff

/s/ Gregg D. Thomas
Attorney