

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.

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

Defendants.

---

**DEFENDANTS' NOTICE OF FILING OF REVISED PROPOSED  
JURY INSTRUCTIONS AND VERDICT FORM**

Defendants Gawker Media, LLC, Nick Denton, and A.J. Daulerio, by and through their undersigned counsel, hereby file this Notice attaching their proposed Jury Instructions for Phase II of the trial, along with their proposed Verdict Form for Phase II of the trial.

March 21, 2016

Respectfully submitted,

THOMAS & LOCICERO PL

By: 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

and

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

*Attorneys for Defendants Gawker Media, LLC,  
Nick Denton, and A.J. Daulerio*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 21st 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](mailto:kturkel@BajoCuva.com)  
Shane B. Vogt, Esq.  
[shane.vogt@BajoCuva.com](mailto: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](mailto:dhouston@houstonatlaw.com)  
432 Court Street  
Reno, NV 89501  
Tel: (775) 786-4188

*Attorney for Plaintiff*

Timothy J. Conner  
Holland & Knight LLP  
50 North Laura Street, Suite 3900  
Jacksonville, FL 32202  
[timothy.conner@hkllaw.com](mailto:timothy.conner@hkllaw.com)

Charles D. Tobin  
Holland & Knight LLP  
800 17th Street N.W., Suite 1100  
Washington, D.C. 20006  
[charles.tobin@hkllaw.com](mailto:charles.tobin@hkllaw.com)

*Attorneys for Intervenors First Look  
Media, Inc., WFTS-TV and WPTV-TV,  
Scripps Media, Inc., WFTX-TV, Journal  
Broadcast Group, Vox Media, Inc., Cable  
News Network, Inc., BuzzFeed and The  
Associated Press*

Charles J. Harder, Esq.  
[charder@HMAfirm.com](mailto:charder@HMAfirm.com)  
Jennifer McGrath, Esq.  
[jmcgrath@hmafirm.com](mailto:jmcgrath@hmafirm.com)  
Harder Mirell & Abrams LLP  
132 South Rodeo Drive, Suite 301  
Beverly Hills, CA 90212-2406  
Tel: (424) 203-1600  
Fax: (424) 203-1601

*Attorneys for Plaintiff*

Allison M. Steele  
Rahdert, Steele, Reynolds & Driscoll, P.L.  
535 Central Avenue  
St. Petersburg, FL 33701  
[amneste@aol.com](mailto:amneste@aol.com)  
[asteelc@rahdertlaw.com](mailto:asteelc@rahdertlaw.com)  
[ncampbell@rahdertlaw.com](mailto:ncampbell@rahdertlaw.com)

*Attorney for Intervenor Times Publ'g Co.*

/s/ Gregg D. Thomas  
Attorney