

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.

**JOINT MOTION TO VACATE AND RESCIND ORDER
ON PROCEEDINGS SUPPLEMENTARY**

Plaintiff, Terry Gene Bollea, professionally known as Hulk Hogan (“Bollea”), and Defendant, A.J. Daulerio (“Daulerio”), by and through their undersigned counsel, file this Joint Motion to Vacate and Rescind Order on Proceedings Supplementary and, in support, state as follows:

1. On or about August 16, 2016, the Court entered an Order on Proceedings Supplementary transferring certain of Daulerio’s assets to Bollea and requiring Daulerio to complete and deliver a complete Fact Information Sheet to Bollea and appear for deposition.

2. In accordance with the December 9, 2016 Settlement Agreement between Bollea and Daulerio, the parties request that the Court enter an order vacating and rescinding its August 16, 2016 Order on Proceedings Supplementary.

WHEREFORE, the parties respectfully requests that this Honorable Court enter an Order vacating and rescinding the existing Order on Proceedings Supplementary dated August 16, 2016 for the purpose of concluding items set forth in the Settlement Agreements entered into in this matter.

{BC00113856:1}

Dated: February 7, 2017, by:

/s/ Kenneth G. Turkel

Kenneth G. Turkel
Florida Bar No. 867233
Email: kturkel@bajocuva.com
Shane B. Vogt
Florida Bar No. 257620
Email: svogt@bajocuva.com
BAJO CUVA COHEN & TURKEL, P.A.
100 North Tampa Street, Suite 1900
Tampa, Florida 33602
Tel: (813) 443-2199
Fax: (813) 443-2193
Counsel for Plaintiff

Charles J. Harder, Esq.
PHV No. 102333
HARDER MIRELL & ABRAMS LLP
132 S. Rodeo Drive, Fourth Floor
Beverly Hills, CA 90212
Tel: (424) 203-1600
Fax: (424) 203-1601
Email: charder@hmafirm.com
Pro Hac Vice Counsel for Plaintiff

David R. Houston, Esq.
(Pro Hac Vice application pending)
LAW OFFICE OF DAVID R. HOUSTON
432 Court Street
Reno, NV 89501
Tel: (775) 786-4188
Fax: (775) 786-5091
dhouston@houstonatlaw.com
emily@houstonatlaw.com
Pro Hac Vice Counsel for Plaintiff

/s/ David Marburger

David Marburger
PHV No. _____
david@marburger-law.com
MARBURGER LAW LLC
14650 Detroit Avenue, Suite 450
Cleveland, OH 44107
Tel: (216) 930-0500
Pro Hac Vice Counsel for Defendant,
A.J. Daulerio

/s/ Andrew B. Greenlee

Andrew B. Greenlee
ANDREW B. GREENLEE, P.A.
401 E. 1st Street, Unit 261
Sanford, FL 32772
Tel: (407) 808-6411
andrew@andrewgreenleelaw.com
Counsel for Defendant, A.J. Daulerio

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 7th day of February, 2017 to the following:

David R. Houston, Esquire
Law Office of David R. Houston
432 Court Street
Reno, NV 89501
dhouston@houstonatlaw.com
krosser@houstonatlaw.com
Pro Hac Vice Counsel for Plaintiff

Stuart C. Markman, Esquire
Kristin A. Norse, Esquire
Kynes, Markman & Felman, P.A.
Post Office Box 3396
Tampa, Florida 33601
smarkman@kmf-law.com
knorse@kmf-law.com
plawhead@kmf-law.com
Appellate Co-Counsel for Plaintiff

Andrew B. Greenlee, Esquire
Greenlee, P.A.
401 E. 1st Street, Unit 261
Sanford, FL 32772
Tel: (407) 808-6411
andrew@andrewgreenleelaw.com
Counsel for A.J. Daulerio

David M. Caldevilla – FBN 654248
de la PARTE & GILBERT, P.A.
P.O. Box 2350
Tampa, FL 33601-2350
Tel: (813) 229-2775
Email: dcaldevilla@dgfirm.com
Email: serviceclerk@dgfirm.com
Co-Counsel for Plaintiff,
Terry G. Bollea

David Marburger, Esquire
Marburger Law LLC
14650 Detroit Avenue, Suite 450
Cleveland, OH 44107
Tel: (216) 930-0500
david@marburger-law.com
Pro Hac Vice Counsel for A. J. Daulerio

Steven L. Brannock, Esquire
Celene H. Humphries, Esquire
Brannock & Humphries
1111 West Cass Street, Suite 200
Tampa, FL 33606
sbrannock@bhappeals.com
chumphries@bhappeals.com
eservice@bhappeals.com
*Co-Counsel for Gawker Media, LLC
and Nick Denton*

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
abeene@tlolawfirm.com
*Counsel for Gawker Media, LLC
and Nick Denton*

Seth D. Berlin, Esquire
Paul J. Safier, Esquire

Michael Berry, Esquire
Levine Sullivan Koch & Schultz, LLP

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 Media, LLC and Nick Denton*

1760 Market Street, Suite 1001
Philadelphia, PA 19103
mberry@lskslaw.com
*Pro Hac Vice Counsel for
Gawker Media, LLC and Nick Denton*

Major B. Harding, Esquire
Robert N. Clarke, Jr., Esquire
Ausley McMullen
123 South Calhoun Street
Tallahassee, FL 32301
mharding@ausley.com
rclarke@ausley.com
*Co-Counsel for Levin Sullivan
Koch & Schultz, LLP*

Allison M. Steele
Rahdert, Steele, Reynolds & Driscoll, P.L.
535 Central Avenue
St. Petersburg, FL 33701
amnestee@aol.com
asteel@rahdertlaw.com
ncampbell@rahdertlaw.com
*Attorneys for Intervenor Times Publishing
Company*

Jonathan Vine, Esquire
Aram Megerian, Esquire
Cole, Scott & Kissane, P.A.
4301 West Boy Scout Blvd., Suite 400
Tampa, FL 33607
aram.megerian@csklegal.com
jonathan.vine@csklegal.com
stefanie.copelow@csklegal.com
*Co-Counsel for Levine Sullivan Koch &
Schultz, LLP*

Charles D. Tobin
Holland & Knight LLP
800 17th Street N.W., Suite 1100
Washington, D.C. 20006
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., WFLA-TV, Media General
Operations, Inc., Cable News Network, Inc.,
Buzzfeed and The Associated Press.*

Charles J. Harder, Esq.
Harder Mirell & Abrams LLP
132 S. Rodeo Drive, Fourth Floor
Beverly Hills, CA 90212
Email: charder@hmafirma.com
Pro Hac Vice Counsel for Plaintiff

/s/ Shane B. Vogt
Attorney