

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.

_____ /

DEFENDANT A.J. DAULERIO'S
FIRST SET OF INTERROGATORIES TO PLAINTIFF

Pursuant to Rule 1.340 of the Florida Rules of Civil Procedure, defendant A.J. Daulerio, by his undersigned counsel, hereby requests that plaintiff Terry Gene Bollea serve upon his counsel answers, in writing and under oath, to the following interrogatories within thirty (30) days after service hereof.

Instructions and Definitions

1. "You" and "your" mean the plaintiff Terry Gene Bollea, and any agents, attorneys, or other persons or entities acting for or on behalf of him or in concert with him, including without limitation any personal services corporations that make available or license services of plaintiff. Each interrogatory seeks all information in the possession, custody or control of all such persons and/or entities.

2. The "Gawker Defendants" means defendants Gawker Media, LLC, Gawker Media Group, Inc., Gawker Entertainment, LLC, Gawker Technology, LLC, Gawker Sales, LLC, Nick Denton, A.J. Daulerio, and Kate Bennert.

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3. The “Video” means the video and audio footage depicting Mr. Bollea that he claims was made without his consent in or about 2006 at issue in this lawsuit.

4. The “Gawker Story” means the story entitled ‘Even For a Minute, Watching Hulk Hogan Have Sex on a Canopy Bed is Not Safe For Work, But Watch It Anyway’ published on www.gawker.com on or about October 4, 2012.

5. “Complaint” means the Amended Complaint filed by you on or about December 28, 2012, to commence this action against the Gawker Defendants.

6. “Sexual Relations” means sexual intercourse, anal intercourse, fellatio, or cunnilingus.

7. The words “and” and “or” also have the meaning “and/or.”

8. The terms “all” and “any” shall be considered to include “each” and every.” Use of any of these terms incorporates them all.

9. The term “person” means all individuals and entities.

10. “Communication” shall be construed in its broadest sense and shall mean every manner or means of disclosure, transfer or exchange, and every disclosure, transfer or exchange of information, whether orally, or face-to-face or by telephone, mail, personal delivery, document, or otherwise.

11. Unless otherwise specified, the term “Relevant Time Period” means the period from 2002 to the present.

12. Where you are asked to “name” or “identify” or to provide the “identity” of a person, you are being asked to state the full name, an address where service of process may be had, telephone number, and job title or job description of that person.

13. Where you are asked to “describe” or “identify” a document, fact, conversation, communication, or other tangible or intangible thing (collectively “thing”), you are being asked to state the nature of the thing including its component parts and their interrelationship, the substance of the thing including its contents, the identity of the creator of the thing, the identity of those who had or have access to or received the thing, and the present location and custodian of the thing if it is tangible or has been reduced to tangible form.

14. Throughout these requests, the singular shall include the plural and the plural shall include the singular.

15. The following terms should be read as if they were synonymous, and each should be taken to include the meaning of all of the others: related to, related in any manner to, concerning, referring to, alluding to, responding to, connected with, with respect to, commenting on, about, regarding, announcing, explaining, discussing, showing, describing, studying, reflecting, analyzing or constituting.

16. If you contend that it would be unreasonably burdensome to obtain and provide all the information called for in response to any interrogatory or subpart, you should:

(a) set forth all information that is available without unreasonable burden; and

(b) describe with particularity the efforts made to secure any information the provision of which you claim would be an unreasonable burden.

17. With respect to your responses to the following interrogatories, if any answer to an interrogatory, or portion thereof, is withheld because of a claim of privilege,

please state the basis for your claim of privilege with respect to such information and the specific ground(s) on which the claim of privilege rests.

18. If an interrogatory is objected to, but an answer or partial answer is provided without waiver of the objection, such answer should clearly define what is being answered. For example, if an interrogatory is alleged to be ambiguous, an answer should set forth the understanding of the ambiguity upon which the answer is based. Or, if the answer is limited to avoid an alleged overbreadth, undue burden or expense, the limitation should be set forth.

Interrogatories

Interrogatory No. 1: State the total amount of your gross annual income (and, if you had more than one source of income, identify each source separately and provide the amount received from each such source) for each calendar year during the Relevant Time Period and identify all documents reflecting that amount for each such year.

Interrogatory No. 2: Identify all medical providers and health care professionals you have seen as a result of your alleged emotional distress you claim was caused by the alleged actions of the Gawker Defendants or any of them, and identify all documents relating to such providers and professionals.

Interrogatory No. 3: Identify any and all accountant(s), bookkeeper(s), business attorney(s), and persons who prepared any tax form on your behalf or on behalf of any entity controlled or owned by you during the Relevant Time Period.

Interrogatory No. 4: Identify any and all facts supporting your claim in the Complaint that Heather Clem violated your privacy rights by participating in videotaping you having Sexual Relations with her without your knowledge, and identify all documents relating to such claim, and all persons having knowledge of the facts relating to such claim.

Interrogatory No. 5: State each address at which you have resided during the Relevant Time Period, and identify each person with whom you have shared a residence during the Relevant Time Period.

Interrogatory No. 6: Identify any and all facts supporting your claim that the Video was taken without your knowledge, consent or approval, and identify all documents relating to such claim, and all persons having knowledge of the facts relating to such claim.

Interrogatory No. 7: Identify all facts supporting your claim that the Gawker Defendants, or any of them, acted intentionally and maliciously, as alleged in the Complaint, and identify all documents relating to such claim, and all persons having knowledge of the facts relating to such claim.

Interrogatory No. 8: Identify each person whom you believe may have knowledge concerning any of the allegations of your Complaint in this action. As to each such person, state the subject matter about which you believe that person has knowledge and the substance of the facts about which you believe that person has knowledge.

Respectfully submitted,

Respectfully submitted,

THOMAS & LOCICERO PL

By: /s/ Gregg D. Thomas

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Counsel for Gawker Media, LLC

VERIFICATION

I verify under penalty of perjury that the foregoing is true and correct. Executed on this ____ day of _____, 2013.

Signature: _____

Printed Name: Terry Gene Bollea

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, personally appeared Terry Gene Bollea, who, being first duly sworn and being personally known to me or having produced _____ as identification, deposes and says that he has read and signed the foregoing interrogatory answers and that the answers are true and correct to the best of his knowledge, information, and belief.

SWORN TO and subscribed before me this ____ day of _____, 2013.

SEAL

Notary Public State of Florida
Printed Name: _____
Commission No.: _____
My Commission Expires: _____

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of June 2013, I caused a true and correct copy of the foregoing to be served by email upon the following counsel of record:

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