

**IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT,
IN AND FOR PINELLAS COUNTY, FLORIDA,
CIVIL DIVISION**

TERRY GENE BOLLEA, Professionally
known as HULK HOGAN,

Plaintiff,

CASE NO. 12-01247-CI-011

vs.

HEATHER CLEM a/k/a Heather Cole an
Individual, GAWKER MEDIA LLC,
and BUBBA THE LOVE SPONGE CLEM
a/k/a Todd Alan Clem,

Defendants.

_____ /

**DEFENDANT, HEATHER COLE’S, RESPONSE TO DEFENDANT, GAWKER
MEDIA, LLC’S, SECOND REQUEST FOR PRODUCTION OF DOCUMENTS**

Defendant, Heather Cole (hereinafter referred to as “Ms. Cole”), by and through the undersigned counsel, responds to the Second Request for Production propounded by Defendant, Gawker Media, LLC, under Certificate of Services dated August 2, 2013, as follows:

1. Any and all documents in any manner related to the Gawker Story and/or the excerpts of the Bollea Video accompanying the Gawker Story.

RESPONSE: See attached emails from Bubba the Love Sponge dated April 19, 2012 and from Ms. Cole dated April 23, 2013.

2. Any and all documents in any manner related to any communications you had about the Gawker Story and/or the excerpts of the Bollea Video accompanying the Gawker Story.

RESPONSE: Ms. Cole has no knowledge of the existence of documents related to this request, nor is she in possession, custody, or control of documents related to this request.

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3. Any and all documents in any manner related to any communications with Mr. Bollea during the Relevant Time Period.

RESPONSE: Objection. This discovery request is so broad and unlimited as to scope. Without waving said objection, Ms. Cole has no knowledge of the existence of documents related to this request, nor is she in possession, custody, or control of documents related to this request.

4. Any and all documents concerning the ownership of any Sex Video, including, but not limited to, the Bollea Video.

RESPONSE: Ms. Cole has no knowledge of the existence of documents related to this request, nor is she in possession, custody, or control of documents related to this request.

5. Any and all documents related to any steps taken to -maintain the confidentiality of any-Sex-Video, including, but not limited to, the Bollea. Video.

RESPONSE: Ms. Cole has no knowledge of the existence of documents related to this request, nor is she in possession, custody, or control of documents related to this request.

6. Any and all documents concerning the dissemination, transmission, distribution, publication, sale and/or offering for sale of any Sex Video, including, but not limited to, the Bollea Video.

RESPONSE: See attached emails from Bubba the Love Sponge dated April 19, 2012 and from Ms. Cole dated April 23, 2013.

7. Any and all documents concerning the storage or disposal of any Sex Video, including, but not limited to, the Bollea Video.

RESPONSE: Ms. Cole has no knowledge of the existence of documents related to this request, nor is she in possession, custody, or control of documents related to this request.

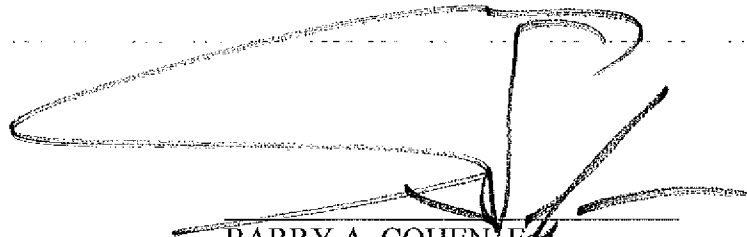
8. Any and all documents concerning any public statements made by you about the Bollea Video, including without limitation any statements made through any social media accounts (e.g., twitter or Facebook), even if such accounts have since been closed or deleted.

RESPONSE: Ms. Cole has no knowledge of the existence of documents related to this request, nor is she in possession, custody, or control of documents related to this request.

9. Any and all documents concerning any. public statements made by you about the Gawker Story and/or the excerpts of the Bollea Video accompanying the Gawker Story, including without limitation any statements made through any social media accounts (e.g., Twitter or Facebook), even if such accounts have since been closed or deleted.

RESPONSE: Ms. Cole has no knowledge of the existence of documents related to this request, nor is she in possession, custody, or control of documents related to this request.

Date: 11-21-13



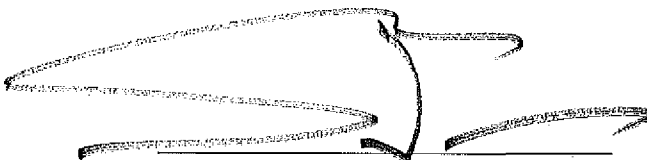
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 21st day of November, 2013, that a copy of the foregoing has been served via electronic mail to:

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Date: 11-21-13



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