

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

TERRY GENE BOLLEA professionally
known as HULK HOGAN,

Plaintiff,

vs.

Case No. 12012447CI-011

HEATHER CLEM; GAWKER MEDIA, LLC
aka GAWKER MEDIA; GAWKER MEDIA
GROUP, INC. aka GAWKER MEDIA;
GAWKER ENTERTAINMENT, LLC;
GAWKER TECHNOLOGY, LLC; GAWKER
SALES, LLC; NICK DENTON; A.J.
DAULERIO; KATE BENNERT, and
BLOGWIRE HUNGARY SZELLEMI
ALKOTAST HASZNOSITO KFT aka
GAWKER MEDIA,

Defendants.

**SECOND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO DEFENDANT GAWKER MEDIA, LLC**

Pursuant to Florida Rules of Civil Procedure 1.350, Plaintiff Terry Gene Bollea, professionally known as Hulk Hogan ("PLAINTIFF") hereby requests that Defendant Gawker Media, LLC produce for inspection and copying each of the documents or categories of documents described hereafter at the law offices of Bajo Cuva Cohen & Turkel, P.A., 100 North Tampa Street, Suite 1900, Tampa, Florida 33602, on July 29, 2013, at 10:00 a.m.

Pursuant to the provisions of Florida Rule of Civil Procedure 1.350, you are required to produce the documents requested below, numbered 89 through 106, within thirty days from the certificate of service.

ELECTRONICALLY FILED 6/27/2013 6:21:59 PM: KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

Definitions and Instructions

As used in this Request for Production of Documents:

(a) “YOU” or “YOUR” or “GAWKER” means Defendant Gawker Media, LLC and its parent company, subsidiaries, affiliated companies, including but not limited to Gawker Media Group, Inc., Gawker Entertainment, LLC, Gawker Technology, LLC, Gawker Sales, LLC, and/or Blogwire Hungary Szellemi Alkotast Hasznosito KFT, and all of their members, shareholders, managers, executives, officers, board members, employees, agents, representatives, attorneys, and all other PERSONS acting on any of their respective behalves.

(b) “GAWKER.COM” means the website located at www.gawker.com, as well as any agents, attorneys, and consultants therefor, and all other PERSONS acting or purporting to act on its behalf.

(c) “BLOGWIRE HUNGARY” means Defendant Blogwire Hungary Szellemi Alkotast Hasznosito KFT and its parent company, subsidiaries, affiliated companies, and all of their members, shareholders, managers, executives, officers, board members, employees, agents, representatives, attorneys, and all other PERSONS acting on any of their respective behalves.

(d) “PERSON” means any individual, firm, partnership, association, proprietorship, joint venture, corporation, governmental agency, or other organization or legal or business entity, as well as any agents, attorneys and consultants therefor, and all other PERSONS acting or purporting to act on its behalf.

(e) “COMMUNICATION” means any correspondence, contact, discussion, or exchange between any two or more PERSONS. Without limiting the foregoing,

“COMMUNICATION” includes all DOCUMENTS, telephone conversations or face-to-face conversations, electronic messages, meetings and conferences.

(f) “DOCUMENT” means the original and any copy (except for identical copies) of any document or thing subject to production under the Florida Rules of Civil Procedure, that is in your actual or constructive possession, custody, or CONTROL, including any written, printed, recorded, typed, mechanical, electronic, computer stored or graphic matter of any kind however produced or reproduced and all drafts thereof. Any copy containing thereon or attached thereto any alterations, notes, comments, or other material not included in any original or other copy shall not be deemed an identical copy but shall be deemed a separate document within the foregoing definition.

(g) “CONTROL” shall mean the right to secure, or a reasonable likelihood of securing, the DOCUMENT or a copy thereof from another PERSON having actual physical possession thereof. If any DOCUMENT requested was, but is no longer in YOUR possession or subject to YOUR CONTROL as defined herein, YOU are instructed to state what disposition was made of it and the date or dates, or approximate date or dates, on which such disposition was made.

(h) “RELATE TO” or “REFER TO” means concerning, respecting, summarizing, digesting, embodying, reflecting, establishing, tending to establish, delegating from, tending not to establish, evidencing, not evidencing, comprising, connected with, commenting on, responding to, disagreeing with, showing, describing, analyzing, representing, constituting or including, or having any connection with.

(i) In the event any request herein calls for information or for the identification of a DOCUMENT which you deem to be privileged, in whole or in part,

the information should be given or the DOCUMENT identified to the fullest extent possible consistent with such claim of privilege, and you should state the nature of the privilege claimed and specify the grounds relied upon for the claim of privilege.

- (j) A separate answer shall be furnished for each request.

REQUESTS FOR PRODUCTION OF DOCUMENTS

89. All DOCUMENTS that describe the role, function and/or line of business of Gawker Media, LLC, Gawker Media Group, Inc., Gawker Entertainment, LLC, Gawker Technology, LLC, Gawker Sales, LLC, Blogwire Hungary Szellemi Alkotast Hasznosito KFT, and/or their affiliates.

90. All DOCUMENTS that describe the role or function of Gawker Media, LLC, Gawker Media Group, Inc., Gawker Entertainment, LLC, Gawker Technology, LLC, Gawker Sales, LLC, Blogwire Hungary Szellemi Alkotast Hasznosito KFT, and/or their affiliates, with respect to the publication of material on GAWKER.COM.

91. All financial statements, including but not limited to balance sheets, income statements, and statements of changes in financial position, for Gawker Media, LLC, Gawker Media Group, Inc., Gawker Entertainment, LLC, Gawker Technology, LLC, Gawker Sales, LLC, Blogwire Hungary Szellemi Alkotast Hasznosito KFT, and/or their affiliates, including any combined financial statements, covering all periods from January 1, 2010 through the present.

92. All DOCUMENTS that RELATE TO any and all financial transactions between or among Gawker Media, LLC, Gawker Media Group, Inc., Gawker Entertainment, LLC, Gawker Technology, LLC, Gawker Sales, LLC, and/or Blogwire Hungary Szellemi Alkotast Hasznosito KFT, and/or their affiliates, between January 1, 2010 and the present.

93. All DOCUMENTS that RELATE TO the direct or indirect receipt of advertising revenue in connection with GAWKER.COM by Gawker Media, LLC, Gawker Media

Group, Inc., Gawker Entertainment, LLC, Gawker Technology, LLC, Gawker Sales, LLC and/or Blogwire Hungary Szellemi Alkotast Hasznosito KFT, and/or their affiliates.

94. All DOCUMENTS that RELATE TO any and all actions by BLOGWIRE HUNGARY with respect to GAWKER.COM and/or its content.

95. All DOCUMENTS that RELATE TO any and all actions by Gawker Media Group, Inc. with respect to GAWKER.COM and/or its content.

96. All DOCUMENTS that RELATE TO any and all actions by Gawker Entertainment, LLC with respect to GAWKER.COM and/or its content.

97. All DOCUMENTS that RELATE TO any and all actions by Gawker Technology, LLC with respect to GAWKER.COM and/or its content.

98. All DOCUMENTS that RELATE TO any and all actions by Gawker Sales, LLC with respect to GAWKER.COM and/or its content.

99. DOCUMENTS sufficient to show all revenues received by Gawker Media, LLC since January 1, 2012, and/or the basis for its receipt of such revenues.

100. DOCUMENTS sufficient to show all revenues, compensation, funding and/or assets received by Gawker Media Group, Inc. since January 1, 2012, and/or the basis for its receipt of such revenues, compensation, funding and/or assets.

101. DOCUMENTS sufficient to show all revenues, compensation, funding and/or assets received by Gawker Entertainment, LLC since January 1, 2012, and the basis for its receipt of such revenues, compensation, funding and/or assets.

102. DOCUMENTS sufficient to show all revenues, compensation, funding and/or assets received by Gawker Technology, LLC since January 1, 2012, and the basis for its receipt of such revenues, compensation, funding and/or assets.

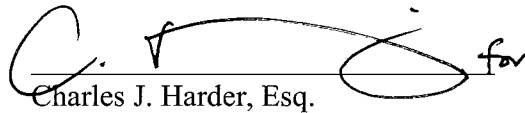
103. DOCUMENTS sufficient to show all revenues, compensation, funding and/or assets received by Gawker Sales, LLC since January 1, 2012, and the basis for its receipt of such revenues, compensation, funding and/or assets.

104. DOCUMENTS sufficient to show all revenues, compensation, funding and/or assets received by BLOGWIRE HUNGARY since January 1, 2012, and the basis for its receipt of such revenues, compensation, funding and/or assets.

105. All DOCUMENTS that RELATE TO COMMUNICATIONS between GAWKER, on the one hand, and any vendor engaged to conduct, assist in, or otherwise participate in any electronic discovery, computer searches, or database management with respect to DOCUMENTS that are relevant to this action.

106. All DOCUMENTS that RELATE TO any protocols, instructions, or search criteria RELATING TO any electronic discovery, computer searches, or database management conducted or assisted by any vendor with respect to DOCUMENTS that are relevant to this action.

DATED: June 27, 2013

A handwritten signature in black ink, appearing to read "C. J. Harder" with a stylized flourish at the end that includes the word "for".

Charles J. Harder, Esq.
PHV No. 102333
HARDER MIRELL & ABRAMS LLP
1801 Avenue of the Stars, Suite 1120
Los Angeles, CA 90067
Tel: (424) 203-1600
Fax: (424) 203-1601
Email: charder@hmfirma.com

-and-

Kenneth G. Turkel, Esq.
Florida Bar No. 867233
Christina K. Ramirez, Esq.
Florida Bar No.
BAJO CUVA COHEN & TURKEL, P.A.
100 North Tampa Street, Suite 1900
Tampa, Florida 33602
Tel: (813) 443-2199
Fax: (813) 443-2193
Email: kturkel@bajocuva.com
Email: cramirez@bajocuva.com

Counsel for Plaintiff

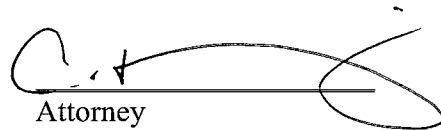
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via e-mail this 27th day of June, 2013 to the following:

Barry A. Cohen, Esquire
D. Keith Thomas, Esquire
Michael W. Gaines, Esquire
bcohen@tampalawfirm.com
dkthomas@tampalawfirm.com
mgaines@tampalawfirm.com
Counsel for Heather Clem

Gregg D. Thomas, Esquire
Rachael E. Fugate, Esquire
gthomas@tlolawfirm.com
rfugate@tlolawfirm.com
Counsel for Gawker Defendants

Seth D. Berlin, Esquire
Paul J. Safier, Esquire
sberlin@skslaw.com
psafier@skslaw.com
Pro Hac Vice Counsel for
Gawker Defendants


Attorney