

EXHIBIT A

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 GAWKER MEDIA, LLC'S
FIRST SET OF INTERROGATORIES
DIRECTED TO DEFENDANT HEATHER CLEM

Pursuant to Rule 1.340 of the Florida Rules of Civil Procedure, defendant Gawker Media, LLC, (“Gawker”) by its undersigned counsel, hereby requests that Defendant Heather Clem serve upon Gawker’s 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 defendant Heather Clem (“Mrs. Clem”), and any agents, attorneys, or other persons or entities acting for or on behalf of her or in concert with her. Each interrogatory seeks all information in the possession, custody or control of all such persons and/or entities.
2. “Plaintiff” means Plaintiff Terry Gene Bollea (professionally known as Hulk Hogan), as well as any agents, attorneys and consultants acting on his behalf.
3. “Mr. Clem” means your former husband, Todd Alan Clem.

4. “Recording” shall mean any audio and/or visual recording in any medium.
5. “Sex Video” means any video or audio footage created during the period in which Mrs. Clem was married to Mr. Clem that depicts Mrs. Clem having sexual relations with someone other than Mr. Clem, or Mr. Clem having sexual relations with a person or persons other than Mrs. Clem. For the avoidance of doubt, “Sex Video” includes any video and/or audio footage depicting Mrs. Clem having sexual relations with Plaintiff including the Bollea Video as that term is defined below.
6. The “Bollea Video” means the Sex Video that is at issue in this lawsuit and the subject of Gawker Story as that term is defined below and excerpts of which were posted on www.gawker.com to accompany the Gawker Story.
7. “Gawker” means Defendant Gawker Media, LLC.
8. 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.
9. “Sexual Relations” means sexual intercourse, anal intercourse, fellatio, or cunnilingus.
10. The words “and” and “or” also have the meaning “and/or.”
11. The terms “all” and “any” shall be considered to include “each” and every.” Use of any of these terms incorporates them all.
12. The term “person” means all individuals and entities.
13. Unless otherwise specified, the term “Relevant Time Period” means the period from 2002 to the present.

14. The term “document(s)” means all materials within the full scope of Rule 1.350, including but not limited to: all writings and recordings, including the originals and all non-identical copies, whether different from the original by reason of any notation made on such copies or otherwise (including but without limitation to, email and attachments, “instant” messages or “IM” messages, “wall” postings on Facebook, Myspace postings, Twitter postings or “tweets,” correspondence, memoranda, notes, diaries, minutes, statistics, letters, telegrams, contracts, reports, studies, checks, statements, tags, labels, invoices, brochures, periodicals, telegrams, receipts, returns, summaries, pamphlets, books, interoffice and intraoffice communications, offers, notations of any sort of conversations, working papers, applications, permits, file wrappers, indices, telephone calls, meetings or printouts, teletypes, telefax, invoices, worksheets, and all drafts, alterations, modifications, changes and amendments of any of the foregoing), graphic or aural representations of any kind (including without limitation, photographs, charts, microfiche, microfilm, videotape, recordings, motion pictures, plans, drawings, surveys), and electronic, mechanical, magnetic, optical or electric records or representations of any kind (including without limitation, computer files and programs, tapes, cassettes, discs, recordings), including metadata.

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

16. 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.

17. 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.

18. 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.

19. 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: Identify each person or entity who knew of the existence of the Bollea Video prior to the publication of the Gawker Story and the excerpts of the Bollea Video accompanying the Gawker Story.

Interrogatory No. 2: Identify each person other than Mr. Clem who was recorded engaging in Sexual Relations with you during the time that you were married to Mr. Clem, and state all facts that relate to whether each such person consented to the Recording and/or the dissemination of the Recording.

Interrogatory No. 3: Identify each person or entity (other than persons who have merely viewed the Gawker Story and the excerpts of the Bollea Video accompanying the Gawker Story) who has possession, custody, or control of any Recording of you engaging in Sexual Relations with anyone other than Mr. Clem during the time that you were married to Mr. Clem.

Interrogatory No. 4: Identify all monetary and non-monetary consideration you have received in connection with the sale, transfer, licensing, distribution, dissemination or hypothecation of any Recordings of you engaging in Sexual Relations.

Interrogatory No. 5: Identify all monetary and non-monetary consideration that all persons have received (including without limitation you, Mr. Clem, Gawker, and third parties) in connection with the sale, transfer, licensing, distribution, dissemination, or hypothecation of the Bollea Video.

Interrogatory No. 6: State all facts that relate to how the Bollea Video was recorded, including but not limited to who owned the equipment, who set up and/or operated the equipment, where the equipment was located, when the recording was made, and who was aware of the recording.

Interrogatory No. 7: Identify all documents that refer or relate to all facts requested to be identified in Interrogatory Nos. 5 and 6, above.

Interrogatory No. 8: State all facts regarding the purpose for the creation and storage of the Bollea Video, including your purpose, and Mr. Clem's purpose, for creating and storing it (such as, for example, sale and licensing to a distributor or to the public directly; personal viewing by you and/or Mr. Clem, but not public sale or license; sharing with third parties (please specify) but not public sale or license, etc.).

Interrogatory No. 9: State all facts that relate to how you contend the Bollea Video came into the possession, custody, or control of Gawker, including but not limited to: the identity of all persons who were involved in the distribution, transfer, purported license or sale of the Bollea Video; the terms of the purported distribution, transfer, purported license or sale of the Bollea Video; and the identity of all documents that refer or relate to the facts requested to be identified above.

Interrogatory No. 10: Identify all documents in your possession, custody or control that refer or relate to the Bollea Video.

VERIFICATION

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

Printed Name: _____
Title: _____

STATE OF _____

CITY/COUNTY OF _____

BEFORE ME, the undersigned authority, personally appeared _____, _____, who being duly sworn, deposes and says that the foregoing Answers to Interrogatories are true to the best of her knowledge and belief and who did take an oath.

WITNESS my hand and official seal this _____ day of _____, 2013.

Signature of Notary Public

Notary Name Printed, Stamped or Typed
My Commission Expires:

Personally known _____
Printed Identification _____