## IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT IN AND FOR PINELLAS COUNTY, FLORIDA CASE NUMBER: 12012447-CI-011

TERRY GENE BOLLEA, professionally known as HULK HOGAN

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VS.

HEATHER CLEM; GAWKER MEDIA, LLC, a/k/a GAWKER MEDIA; et al.,

Defendants.	

## PRIVILEGE LOG

COMES NOW, Todd Alan Clem, a/k/a Bubba the Love Sponge Clem ("Mr. Clem"), by and through the undersigned counsel, and hereby files this, its Privilege Log in Response to Defendant Gawker Media, LLC's Subpoena Duces Tecum without Deposition, and states as follows:

PAGES	DOCUMENT DESCRIPTION	DATE OF DOCUMENT
2	Attorney Correspondence regarding terms and compliance with Clem/Bollea settlement agreement.	August 27, 2013
4	Attorney Correspondence – Letter regarding resolution of Bollea/Clem video claims	October 16, 2012
4	Attorney Correspondence – Settlement negotiation re Bollea/Clem video	October 17, 2012
2	Attorney Correspondence – Letter regarding resolution of Bollea/Clem video claims	October 15, 2012
6	Confidential Settlement Agreement between Mr. Clem and Plaintiff re: Bollea/Clem video	October 26, 2012

16	Attorney Correspondence between Stephen Diaco, Esq., Counsel for Mr. Clem, and various parties concerning negotiation and resolution of the Bollea/Clem video and claims against Mr. Clem.	October 15-25, 2012
3	Attorney Correspondence – Fax of Letter regarding defense of claims against Mr. Clem by Plaintiff	October 19, 2012
4	Line Edits of Settlement Agreement draft with comments for claims of Plaintiff against Mr. Clem relating to Bollea/Clem video	October 21, 2012
3	Draft Settlement Agreement for claims of Plaintiff against Mr. Clem relating to Bollea/Clem video	October 17, 2012
17	Marital Settlement Agreement between Mr. Clem and Defendant, Heather Clem	February 13, 2012

## CERTIFICATE OF SERVICE

day of October, 2013, a true and correct copy of I HEREBY CERTIFY that on this the foregoing was furnished by electronic mail to:

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