

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

Plaintiff,

vs.

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

Defendants.

_____ /

**SECOND AMENDED OBJECTIONS AND
RESPONSES TO DEFENDANT GAWKER MEDIA, LLC's
SUBPOENA DUCES TECUM WITHOUT DEPOSITION**

1. Objection sustained by Judge Campbell as to the settlement documents and settlement communications claimed as privileged on Mr. Clem's Privilege Log. Mr. Clem is not in possession, custody or control of any additional responsive documents.
2. Objection sustained by Judge Campbell as to the settlement documents and settlement communications claimed as privileged on Mr. Clem's Privilege Log. Mr. Clem is not in possession, custody or control of any additional responsive documents.
3. Objection sustained by Judge Campbell as to other sex videos. The Court limited Gawker's discovery to documents related to the video at issue which is consistent with her prior ruling limiting Gawker's discovery to Plaintiff, Terry Bollea.
4. Objection sustained by Judge Campbell as to other sex videos. The Court limited Gawker's discovery to documents related to the video at issue which is consistent with her prior ruling limiting Gawker's discovery to Plaintiff, Terry Bollea. Pursuant to the Court's instructions, Tweets, if any exist related to the Bollea video, will not be removed

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or destroyed. Mr. Clem is not in possession, custody or control of any additional responsive documents.

5. Objection sustained by Judge Campbell as to the settlement documents and communications claimed as privileged on Mr. Clem's Privilege Log. Pursuant to the Court's instructions, Tweets, if any exist related to the Bollea video, will not be removed or destroyed. Mr. Clem is not in possession, custody or control of any additional responsive documents.
6. Objection sustained by Judge Campbell as to the settlement documents and settlement communications claimed as privileged on Mr. Clem's Privilege Log. Pursuant to the Court's instructions, Tweets, if any exist related to the Bollea video, will not be removed or destroyed. Audio clips from the Bubba the Love Sponge Show related to the "Gawker story and/or excerpts of Bollea video accompanying the Gawker Story" are attached. Mr. Clem is not in possession, custody or control of any additional responsive documents.
7. Objection sustained by Judge Campbell as to the settlement documents and settlement communications claimed as privileged on Mr. Clem's Privilege Log. Pursuant to the Court's instructions, Tweets, if any exist related to the Bollea video, will not be removed or destroyed. Audio clips from the Bubba the Love Sponge Show related to the "Gawker story and/or excerpts of Bollea video accompanying the Gawker Story" are attached. Mr. Clem is not in possession, custody or control of any additional responsive documents.
- 7(sic.) Objection sustained by Judge Campbell as to other sex videos. The Court limited Gawker's discovery to documents related to the video at issue which is consistent with her prior ruling limiting Gawker's discovery to Plaintiff, Terry Bollea.

8. Objection sustained by Judge Campbell as to other sex videos. The Court limited Gawker's discovery to documents related to the video at issue which is consistent with her prior ruling limiting Gawker's discovery to Plaintiff, Terry Bollea. Subject to the Court's limitation, Mr. Clem is NOT in possession, custody or control of any responsive documents other than the confidential Marital Settlement Agreement listed on Mr. Clem's Privilege Log which was previously produced to Plaintiff by Defendant, Heather Clem, pursuant to a confidentiality agreement.
9. Objection sustained by Judge Campbell as to other sex videos. The Court limited Gawker's discovery to documents related to the video at issue which is consistent with her prior ruling limiting Gawker's discovery to Plaintiff, Terry Bollea. Subject to the Court's limitation, Mr. Clem is NOT in possession, custody or control of any responsive documents other than the confidential Marital Settlement Agreement listed on Mr. Clem's Privilege Log which was previously produced to Plaintiff by Defendant, Heather Clem, pursuant to a confidentiality agreement.
10. Objection sustained by Judge Campbell as to other sex videos. The Court limited Gawker's discovery to documents related to the video at issue which is consistent with her prior ruling limiting Gawker's discovery to Plaintiff, Terry Bollea. Subject to the Court's limitation, Mr. Clem is not in possession, custody or control of any responsive documents.
11. Objection sustained by Judge Campbell as to other sex videos. The Court limited Gawker's discovery to documents related to the video at issue which is consistent with her prior ruling limiting Gawker's discovery to Plaintiff, Terry Bollea. Subject to the

Court's limitation, Mr. Clem is not in possession, custody or control of any responsive documents.

12. Objection sustained by Judge Campbell as to other sex videos. The Court limited Gawker's discovery to documents related to the video at issue which is consistent with her prior ruling limiting Gawker's discovery to Plaintiff, Terry Bollea. Subject to the Court's limitation, Mr. Clem is not in possession, custody or control of any responsive documents.
13. Objection sustained by Judge Campbell as to other sex videos. The Court limited Gawker's discovery to documents related to the video at issue which is consistent with her prior ruling limiting Gawker's discovery to Plaintiff, Terry Bollea. Subject to the Court's limitation, Mr. Clem is NOT in possession, custody or control of any responsive documents other than the confidential Marital Settlement Agreement listed on Mr. Clem's Privilege Log which was previously produced to Plaintiff by Defendant, Heather Clem, pursuant to a confidentiality agreement.
14. Objection sustained by Judge Campbell as to other sex videos. The Court limited Gawker's discovery to documents related to the video at issue which is consistent with her prior ruling limiting Gawker's discovery to Plaintiff, Terry Bollea. Subject to the Court's limitation, Mr. Clem is NOT in possession, custody or control of any responsive documents, including the subject video.
15. Mr. Clem is NOT in possession, custody or control of any responsive documents.
16. Mr. Clem is NOT in possession, custody or control of any responsive documents.
17. Objection sustained by Judge Campbell as to other sex videos. The Court limited Gawker's discovery to documents related to the video at issue which is consistent with

her prior ruling limiting Gawker's discovery to Plaintiff, Terry Bollea. Objection sustained by Judge Campbell as to the settlement documents and communications claimed as privileged on Mr. Clem's Privilege Log. Subject to the Court's limitation, Mr. Clem is NOT in possession, custody or control of any responsive documents, other than the confidential settlement agreement with Plaintiff and the statement itself that has been previously produced by Plaintiff pursuant to a confidentiality agreement.

18. Objection sustained by Judge Campbell as to the settlement documents and communications claimed as privileged on Mr. Clem's Privilege Log. Mr. Clem is not in possession, custody or control of any further responsive documents, other than the confidential settlement agreement with Plaintiff and the statement itself that has been previously produced by Plaintiff pursuant to a confidentiality agreement.
19. Mr. Clem is NOT in possession, custody or control of any responsive documents.
20. Objection sustained by Judge Campbell as to the settlement documents and communications claimed as privileged on Mr. Clem's Privilege Log. Mr. Clem is not in possession, custody or control of any further responsive documents. Tweets, if any exist related to the Bollea video, will not be removed or destroyed as ordered by the Court. Audio clips from the Bubba the Love Sponge Show related to the "Gawker story and/or excerpts of Bollea video accompanying the Gawker Story" are attached.
21. Mr. Clem is NOT in possession, custody or control of any responsive documents.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th day of February, 2014 a true and correct copy of the foregoing was furnished by electronic mail to:

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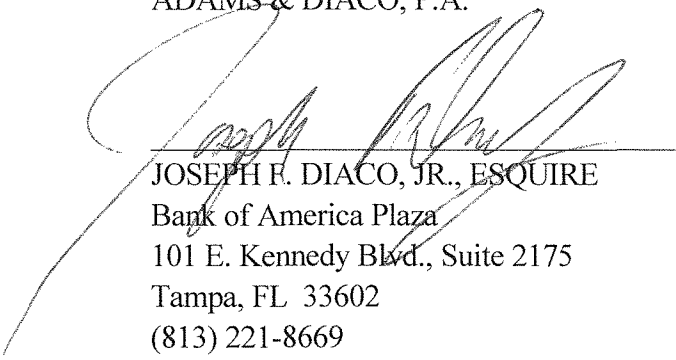
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