

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.

**NON-PARTY JENNIFER BOLLEA’S RESPONSE TO GAWKER MEDIA, LLC’S
SUBPOENA DUCES TECUM**

Non-Party JENNIFER BOLLEA (herein “Responding Party”) hereby responds to the
subpoena duces tecum propounded by defendant GAWKER MEDIA, LLC (herein “Propounding
Party”) as follows:

PRELIMINARY STATEMENT

Responding Party responds to the Subpoena subject to, without waiver of, and expressly
preserving: (a) any objections as to the competency, relevance, materiality, privilege or
admissibility of any of the responses or any of the documents identified in any response hereto;
and (b) the right at any time to revise, correct, supplement or clarify any of the responses herein.

These responses are based upon a diligent investigation undertaken by Responding Party
and her counsel since the service of the Subpoena. These responses reflect only Responding
Party’s current understanding, belief and knowledge regarding the matters about which inquiry

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was made.

GENERAL OBJECTIONS

1. The following Responses, and each of them, are based upon information and writings presently available to, and located by, Responding Party and her attorneys. Responding Party has not completed an investigation of the facts or discovery proceedings in this case. The fact that Responding Party has responded to a Request should not be taken as an admission that Responding Party accepts or admits the existence of any facts set forth or assumed by such Request, or that such Response constitutes admissible evidence.

2. The documents and information which could or would form the basis of responses to the instant Subpoena, in whole or in part, are still in the process of being identified by Responding Party, and all such relevant documents have not yet been identified, examined or produced. In addition, the significance of documents which may now be in the possession of Responding Party may only become apparent upon further discovery and review of those documents in the context of other documents which have not yet been identified or obtained in the context of later testimony or discovery which may establish their relevance.

3. These Responses are made, and any and all documents are being produced, solely for the purposes of this litigation. Any documents supplied in response to the Subpoena are being supplied by Responding Party subject to all objections as to competence, relevance, materiality, propriety and admissibility, and to any and all other objections on any ground that would require the exclusion of any document or portion thereof, if such document were offered in evidence in Court, all of which objections and grounds are expressly reserved and may be interposed at the time of trial.

4. Responding Party objects generally to each and every Request to the extent it

calls for information that is protected by the attorney-client privilege and/or the attorney work product doctrine.

5. Responding Party objects generally to each and every Request to the extent it requests any information concerning the content of conversations of any other party to this action or documents in the possession of any other party to this action, other than the Responding Party, in that such information is equally accessible to all parties. Responding Party specifically, objects, as more specifically set forth below, to each and every Request as duplicative of Requests already directed to her husband, Terry Bollea, in this litigation. Ms. Bollea does not have any additional documents that are not within her husband's possession, custody, or control, and any responsive, non-privileged documents have already been produced in this action.

6. Responding Party objects to producing any private and/or confidential business or proprietary information or trade secrets.

7. Responding Party objects to the definition of the word "documents" to the extent that Propounding Party seeks documents not in Responding Party's possession, custody or control.

8. Responding Party objects to the Subpoena to the extent it is not limited to the subject matter of this action and thus is irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

9. Responding Party objects to the Subpoena to the extent it is unduly burdensome, oppressive, unreasonably cumulative, duplicative and overbroad.

11. Responding Party objects to the Subpoena to the extent it seeks information to which Propounding Party has equal access.

RESPONSES TO REQUESTS FOR PRODUCTION

The Preliminary Statement and General Objections are incorporated into each response below, regardless of whether specifically mentioned. The specific objections set forth below are not a waiver, in whole or in part, of any of the foregoing General Objections. Subject to and without waiver of these objections, Responding Party responds below.

REQUEST 1:

Any and all documents, excluding communications exclusively between yourself and Plaintiff, referring or relating to Sexual Relations between Plaintiff and Heather Clem

RESPONSE TO REQUEST 1:

Responding Party objects to this Request to the extent it calls for production of documents protected by the lawyer-client privilege. Responding Party further objects on the grounds of overbreadth, privacy, and spousal communications privilege. Responding Party further objects on the ground of undue burden. Without waiver of the foregoing, Responding Party responds as follows: Responding Party has no responsive documents in her possession, custody, or control.

REQUEST 2:

Any and all documents, excluding communications exclusively between yourself and Plaintiff, referring or relating to a Sex Tape in which Plaintiff and Heather Clem appear.

RESPONSE TO REQUEST 2:

Responding Party objects to this Request to the extent it calls for production of documents protected by the lawyer-client privilege. Responding Party further objects on the grounds of overbreadth, privacy, and spousal communications privilege. Responding Party further objects on the ground of undue burden. Without waiver of the foregoing, Responding

Party responds as follows: Responding Party has no responsive documents in her possession, custody, or control.

REQUEST 3:

Any and all documents, excluding communications exclusively between yourself and Plaintiff, referring or relating to published reports about a Sex Tape in which Plaintiff appears, including, but not limited to, the Gawker Story.

RESPONSE TO REQUEST 3:

Responding Party objects to this Request to the extent it calls for production of documents protected by the lawyer-client privilege. Responding Party further objects on the grounds of overbreadth, privacy, and spousal communications privilege. Responding Party further objects on the ground of undue burden. Without waiver of the foregoing, Responding Party responds as follows: Responding Party has no responsive documents in her possession, custody, or control.

REQUEST 4:

Any and all documents, excluding communications exclusively between yourself and Plaintiff, referring or relation to any Sex Tape Litigation, including without limited this lawsuit.

RESPONSE TO REQUEST 4:

Responding Party objects to this Request to the extent it calls for production of documents protected by the lawyer-client privilege. Responding Party further objects on the grounds of overbreadth, privacy, and spousal communications privilege. Responding Party further objects on the ground of undue burden. Without waiver of the foregoing, Responding Party responds as follows: Responding Party has no responsive documents in her possession, custody, or control.

REQUEST 5:

Any and all documents from the year 2012 or 2013, excluding communications exclusively between yourself and Plaintiff, referring or relating to Bubba Clem

RESPONSE TO REQUEST 5:

Responding Party objects to this Request to the extent it calls for production of documents protected by the lawyer-client privilege. Responding Party further objects on the grounds of overbreadth, privacy, and spousal communications privilege. Responding Party further objects on the ground of undue burden. Without waiver of the foregoing, Responding Party responds as follows: Responding Party has no responsive documents in her possession, custody, or control.

REQUEST 6:

Any and all documents from the year 2012 or 2013, excluding communications exclusively between yourself and Plaintiff, referring or relating to Heather Clem.

RESPONSE TO REQUEST 6:

Responding Party objects to this Request to the extent it calls for production of documents protected by the lawyer-client privilege. Responding Party further objects on the grounds of overbreadth, privacy, and spousal communications privilege. Responding Party further objects on the ground of undue burden. Without waiver of the foregoing, Responding Party responds as follows: Responding Party has no responsive documents in her possession, custody, or control.

REQUEST 7:

Any and all documents from the year 2012 or 2013, excluding communications exclusively between yourself and Plaintiff, referring or relating to Gawker.

RESPONSE TO REQUEST 7:

Responding Party objects to this Request to the extent it calls for production of documents protected by the lawyer-client privilege. Responding Party further objects on the grounds of overbreadth, privacy, and spousal communications privilege. Responding Party further objects on the ground of undue burden. Without waiver of the foregoing, Responding Party responds as follows: Responding Party has no responsive documents in her possession, custody, or control.

REQUEST 8:

Any and all communications between yourself and Plaintiff referring or relating to Sexual Relations between Plaintiff and Heather Clem.

RESPONSE TO REQUEST 8:

Responding Party objects to this Request on the ground of the spousal communications privilege. Responding Party objects to this Request to the extent it calls for production of documents protected by the lawyer-client privilege. Responding Party further objects on the grounds of overbreadth and privacy. Responding Party further objects on the ground of undue burden.

REQUEST 9:

Any and all communications between yourself and Plaintiff referring or relating to a Sex Tape in which Plaintiff and Heather Clem appear.

RESPONSE TO REQUEST 9:

Responding Party objects to this Request on the ground of the spousal communications privilege. Responding Party objects to this Request to the extent it calls for production of documents protected by the lawyer-client privilege. Responding Party further objects on the

grounds of overbreadth and privacy. Responding Party further objects on the ground of undue burden.

REQUEST 10:

Any and all communications between yourself and Plaintiff referring or relating to published reports about a Sex Tape in which Plaintiff appears, including but not limited to, the Gawker Story.

RESPONSE TO REQUEST 10:

Responding Party objects to this Request on the ground of the spousal communications privilege. Responding Party objects to this Request to the extent it calls for production of documents protected by the lawyer-client privilege. Responding Party further objects on the grounds of overbreadth and privacy. Responding Party further objects on the ground of undue burden.

REQUEST 11:

Any and all communications between yourself and Plaintiff referring or relating to any Sex Tape Litigation, including without limitation this lawsuit.

RESPONSE TO REQUEST 11:

Responding Party objects to this Request on the ground of the spousal communications privilege. Responding Party objects to this Request to the extent it calls for production of documents protected by the lawyer-client privilege. Responding Party further objects on the grounds of overbreadth and privacy. Responding Party further objects on the ground of undue burden.

REQUEST 12:

Any and all communications from the year 2012 or 2013 between yourself and Plaintiff

referring or relating to Bubba Clem.

RESPONSE TO REQUEST 12:

Responding Party objects to this Request on the ground of the spousal communications privilege. Responding Party objects to this Request to the extent it calls for production of documents protected by the lawyer-client privilege. Responding Party further objects on the grounds of overbreadth and privacy. Responding Party further objects on the ground of undue burden.

REQUEST 13:

Any and all communications from the year 2012 or 2013 between yourself and Plaintiff referring or relating to Heather Clem.

RESPONSE TO REQUEST 13:

Responding Party objects to this Request on the ground of the spousal communications privilege. Responding Party objects to this Request to the extent it calls for production of documents protected by the lawyer-client privilege. Responding Party further objects on the grounds of overbreadth and privacy. Responding Party further objects on the ground of undue burden.

REQUEST 14:

Any and all communications from the year 2012 or 2013 between yourself and Plaintiff referring or relating to Gawker.

RESPONSE TO REQUEST 14:

Responding Party objects to this Request on the ground of the spousal communications privilege. Responding Party objects to this Request to the extent it calls for production of documents protected by the lawyer-client privilege. Responding Party further objects on the

grounds of overbreadth and privacy. Responding Party further objects on the ground of undue burden.

DATED: February 19, 2014

Respectfully submitted,

/s/ Kenneth G. Turkel, Esq

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via E-Service through the e-portal system this 19th day of February, 2014 to the following:

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