

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 A.J. DAULERIO'S RESPONSES TO
PLAINTIFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS**

Pursuant to Florida Rule of Civil Procedure 1.350, Defendant A.J. Daulerio ("Daulerio") hereby provides this response to Plaintiff's Second Requests for Production of Documents dated May 23, 2014.

REQUEST AND RESPONSE

REQUEST NO. 85: All DOCUMENTS, including COMMUNICATIONS, that REFER OR RELATE TO the posting on DEADSPIN.COM entitled "Bathroom Sex Pandemic Reaches The Damp Floor Of Indiana Sports Bar," and which was later changed to "Bathroom Sex Pandemic Reaches The Damp Floor Of Indiana Sports Bar (UPDATE)."

RESPONSE: Daulerio objects to this Request to the extent it calls for information protected by privilege, including without limitation the attorney-client privilege and/or the work-product doctrine.¹ Daulerio further objects to this Request on the grounds that it seeks

¹ In connection with Daulerio's Responses to Plaintiff's Second Request for the Production of Documents, he will provide a log of documents, if any, that (a) have been either withheld or redacted as privileged under the attorney client privilege and/or protected by the work product doctrine which were created prior to the commencement of the Lawsuit, as that term is defined in Plaintiff's First Request for Production of Documents to Gawker and (b) would be responsive to Requests that are not otherwise objectionable.

information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving these objections, Daulerio states that he will produce non-privileged documents responsive to this Request in his possession, custody or control.

Dated: July 11, 2014

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By: /s/ Gregg D. Thomas

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 11th day of July 2014, I caused a true and correct copy of the foregoing to be served via the Florida Courts' E-Filing Portal upon the following counsel of record:

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