

EXHIBIT 18

REQUESTS SEEKING INFORMATION ABOUT PLAINTIFF'S PUBLIC IMAGE

Please note, highlighting reflects Gawker's proposed revisions to the requests.

WWE

- **Request No. 4:** All documents reflecting, referring, or relating to your consideration of whether to renew your relationship with Terry Bollea or Hulk Hogan from January 1, 2012 to the present. Please note that this request does not seek any documents reflecting Terry Bollea's or Hulk Hogan's finances or contracts with him, other than to the extent they involve the value of, or sales or licensing of, his appearance or the use of his likeness in connection with Hulk Hogan Videos as requested in Requests No. 13, 14, 15, 16, 17, and 18.
- **Request No. 6:** All market research referring or relating to Terry Bollea or Hulk Hogan from January 1, 2012 to the present, including, but not limited to, any analysis, assessment, or evaluation of the Hulk Hogan brand.
- **Request No. 7:** Documents sufficient to show what characteristics, traits, or other aspects of Terry Bollea or Hulk Hogan you have sought to market or promote from January 1, 2012 to the present.
- **Request No. 8:** Documents sufficient to show how Terry Bollea or Hulk Hogan has been used in WWE's television, print, and video advertising from 2013 to the present.
- **Request No. 9:** All documents for the period from March 1, 2012 to the present reflecting, referring, or relating to communications with Terry Bollea or Hulk Hogan, as well as any agents, representatives, or attorneys representing Terry Bollea, regarding the public image of Terry Bollea or Hulk Hogan. Please note that this request does not seek any documents reflecting Terry Bollea's or Hulk Hogan's finances or contracts with him, other than to the extent they involve the value of, or sales or licensing of, his appearance or the use of his likeness in connection with Hulk Hogan Videos as requested in Requests No. 13, 14, 15, 16, 17, and 18.
- **Request No. 10:** All documents for the period from March 1, 2012 to the present reflecting, referring, or relating to communications with Terry Bollea or Hulk Hogan, as well as any agents, representatives, or attorneys representing Terry Bollea, regarding the public's perception of Terry Bollea or Hulk Hogan. Please note that this request does not seek any documents reflecting Terry Bollea's or Hulk Hogan's finances or contracts with him, other than to the extent they involve the value of, or sales or licensing of, his appearance or the use of his likeness in connection with Hulk Hogan Videos as requested in Requests No. 13, 14, 15, 16, 17, and 18.
- **Request No. 11:** All documents for the period from March 1, 2012 to the present reflecting, referring, or relating to communications with Terry Bollea or Hulk Hogan,

as well as any agents, representatives, or attorneys representing Terry Bollea, regarding what characteristics, traits, or other aspects of Terry Bollea or Hulk Hogan that WWE has sought to promote.

- **Request No. 12:** All documents reflecting, referring, or relating to your decision to use Terry Bollea or Hulk Hogan as a featured personality for WWE from January 1, 2012 to the present. Please note that this request does not seek any documents reflecting Terry Bollea's or Hulk Hogan's finances or contracts with him, other than to the extent they involve the value of, or sales or licensing of, his appearance or the use of his likeness in connection with Hulk Hogan Videos as requested in Requests No. 13, 14, 15, 16, 17, and 18.

Bay Harbor and Mallah

- **Request No. 6:** All documents referring or relating to marketing and advertising the Restaurant using Terry Bollea's or Hulk Hogan's name and likeness from January 1, 2012 to the present. Please note that this request does not seek any documents reflecting Terry Bollea's or Hulk Hogan's finances or contracts with him, other than to the extent they involve the amount Bollea and/or Hogan has been paid for licensing his name, likeness, and/or any trademarks in connection with the Restaurant, as requested by Request No. 7.
- **Request No. 7:** All documents referring or relating to licensing Terry Bollea's or Hulk Hogan's name, likeness, and/or any of his trademarks in connection with the Restaurant, including without limitation all documents referring or relating to any request or proposal by anyone affiliated with the Restaurant, or by Terry Bollea or Hulk Hogan (or any person acting on behalf of Terry Bollea or Hulk Hogan) in connection therewith.
- **Request No. 8:** All documents referring or relating to the image the Restaurant sought to convey through advertising and marketing using Terry Bollea's or Hulk Hogan's name and likeness.
- **Request No. 9:** Copies of all video advertisements for the Restaurant featuring Terry Bollea, Hulk Hogan, or Terry Bollea's or Hulk Hogan's likeness.
- **Request No. 10:** All market research referring or relating to Terry Bollea or Hulk Hogan from January 1, 2012 to the present, including any analysis, assessment, or evaluation of the value of Terry Bollea's or Hulk Hogan's name or likeness.
- **Request No. 11:** Documents sufficient to show what characteristics, traits, or other aspects of Terry Bollea or Hulk Hogan that you sought to market or promote by using his name, likeness and any of his trademarks.
- **Request No. 12:** All documents reflecting, referring, or relating to communications with Terry Bollea or Hulk Hogan (or any person representing Terry Bollea or Hulk

Hogan) concerning marketing the Restaurant, advertising for the Restaurant, or the image the Restaurant seeks to convey to the public.

Tech Assets and Hardgrove

- **Request No. 6:** All documents referring or relating to licensing Terry Bollea's or Hulk Hogan's name, likeness, and any of his trademarks in connection with Hostamania, including without limitation all documents referring or relating to any request or proposal by you, or by Terry Bollea or Hulk Hogan (or any person acting on behalf of Terry Bollea or Hulk Hogan) in connection therewith.
- **Request No. 7:** All documents referring or relating to the decision by you, Tech Assets, Inc., and/or Hostamania to feature Terry Bollea or Hulk Hogan in marketing and advertising for Hostamania.
- **Request No. 8:** All documents referring or relating to the creation and development of the idea for the advertisement featuring Terry Bollea or Hulk Hogan on a wrecking ball. A copy of the advertisement is available at <https://www.youtube.com/watch?v=AgKsJ9uXfpc>.
- **Request No. 10:** All documents referring or relating to the image you or Hostamania sought to convey through the advertisement referenced in Request No. 8.
- **Request No. 11:** All press releases that you, Tech Assets, Inc., or Hostamania issued about the advertisement referenced in Request No. 8.
- **Request No. 12:** Documents sufficient to show what characteristics, traits, or other aspects of Terry Bollea or Hulk Hogan that Hostamania sought to market or promote by using his name, likeness and any of his trademarks.
- **Request No. 13:** All market research referring or relating to Terry Bollea or Hulk Hogan from January 1, 2012 to the present, including any analysis, assessment, or evaluation of the value of Terry Bollea's or Hulk Hogan's name or likeness.

Peter Young, Darren Prince, and Prince Marketing Group

- **Request No. 6:** All documents reflecting, referring, or relating to offers or invitations for Terry Bollea or Hulk Hogan to appear at events or in any Media from January 1, 2011 to the present.
- **Request No. 7:** All documents reflecting, referring, or relating to pitches or proposals by you for Terry Bollea or Hulk Hogan to appear at events or in any Media from January 1, 2011 to the present.
- **Request No. 8:** All documents reflecting, referring, or relating to offers or invitations for Terry Bollea or Hulk Hogan to appear in, or for his name or likeness to be used in, advertisements from January 1, 2011 to the present.

- **Request No. 9:** All documents reflecting, referring, or relating to pitches or proposals by you for Terry Bollea or Hulk Hogan to appear in, or for his name or likeness to be used in, advertisements from January 1, 2011 to the present.
- **Request No. 10:** All documents reflecting, referring, or relating to offers or invitations to license Terry Bollea's or Hulk Hogan's name or likeness for products or commercial enterprises from January 1, 2011 to the present.
- **Request No. 11:** All documents reflecting, referring, or relating to pitches or proposals by you for a person or entity to license Terry Bollea's or Hulk Hogan's name or likeness for products or commercial enterprises from January 1, 2011 to the present.
- **Request No. 12:** All documents reflecting, referring, or relating to Terry Bollea's and Hulk Hogan's appearances in any Media, including without limitation interviews, advertisements, and publicity, from January 1, 2011 to the present.