

# EXHIBIT 13

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.

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**OBJECTIONS OF TERRY BOLLEA TO NOTICES OF INTENT TO SERVE  
SUBPOENAS FOR PRODUCTION OF DOCUMENTS WITHOUT DEPOSITION  
AND PROPOSED NON-PARTY SUBPOENAS**

Plaintiff, Terry Gene Bollea (“Mr. Bollea”), by counsel, pursuant to Rule 1.351(b) of the Florida Rules of Civil Procedure, files this Objection to Gawker Media, LLC’s (“Gawker”) July 7, 2014 Notices of Intent to Serve Subpoenas for Production of Documents without Deposition and the corresponding proposed Subpoenas Duces Tecum without Deposition listed herein and directed towards: (1) Bay Harbor Hotel and Convention Center LLC; (2) Ben Mallah; (3) Cox Media Group; (4) Wortman Works Media & Marketing, Inc.; (5) Jules Wortman Pomeroy; (6) Tech Assets; (7) Marc Hardgrove; (8) Peter Young, Sovereign Talent Group; and (9) TNA Entertainment, LLC. Plaintiff states in support as follows:

1. With respect to the subpoena directed to **Bay Harbor Hotel and Convention Center LLC**, Mr. Bollea objects to the subpoena on the grounds that it is overbroad, oppressive, and harassing; it is not reasonably calculated to lead to the discovery of admissible evidence; and it invades upon Plaintiff's constitutional privacy rights. Further, Mr. Bollea objects to the subpoena to the extent it seeks documents in violation of Judge Campbell's February 26, 2014 protective order, which states that "inquiry into the . . . financial records . . . of Terry Bollea . . . is hereby prohibited."

2. With respect to the subpoena directed to **Ben Mallah**, Mr. Bollea objects to the subpoena on the grounds that it is overbroad, oppressive, and harassing; it is not reasonably calculated to lead to the discovery of admissible evidence; and it invades upon Plaintiff's constitutional privacy rights. Further, Mr. Bollea objects to the subpoena to the extent it seeks documents in violation of Judge Campbell's February 26, 2014 protective order, which states that "inquiry into the . . . financial records . . . of Terry Bollea . . . is hereby prohibited."

3. With respect to the subpoena directed to **Cox Media Group**, Mr. Bollea objects to the subpoena on the grounds that it is overbroad, oppressive, and harassing; and it is not reasonably calculated to lead to the discovery of admissible evidence.

4. With respect to the subpoena directed to **Wortman Works Media & Marketing, Inc.**, Mr. Bollea objects to the subpoena on the grounds that it is overbroad, oppressive, and harassing; it is not reasonably calculated to lead to the discovery of admissible evidence; and it invades upon Plaintiff's constitutional privacy rights. Further, Mr. Bollea objects to the subpoena to the extent it seeks documents in violation

of Judge Campbell's February 26, 2014 protective order, which states that "inquiry into the . . . financial records . . . of Terry Bollea . . . is hereby prohibited."

5. With respect to the subpoena directed to **Jules Wortman Pomeroy**, Mr. Bollea objects to the subpoena on the grounds that it is overbroad, oppressive, and harassing; it is not reasonably calculated to lead to the discovery of admissible evidence; and it invades upon Plaintiff's constitutional privacy rights. Further, Mr. Bollea objects to the subpoena to the extent it seeks documents in violation of Judge Campbell's February 26, 2014 protective order, which states that "inquiry into the . . . financial records . . . of Terry Bollea . . . is hereby prohibited."

6. With respect to the subpoena directed to **Tech Assets**, Mr. Bollea objects to the subpoena on the grounds that it is overbroad, oppressive, and harassing; it is not reasonably calculated to lead to the discovery of admissible evidence; and it invades upon Plaintiff's constitutional privacy rights. Further, Mr. Bollea objects to the subpoena to the extent it seeks documents in violation of Judge Campbell's February 26, 2014 protective order, which states that "inquiry into the . . . financial records . . . of Terry Bollea . . . is hereby prohibited."

7. With respect to the subpoena directed to **Marc Hardgrove**, Mr. Bollea objects to the subpoena on the grounds that it is overbroad, oppressive, and harassing; it is not reasonably calculated to lead to the discovery of admissible evidence; and it invades upon Plaintiff's constitutional privacy rights. Further, Mr. Bollea objects to the subpoena to the extent it seeks documents in violation of Judge Campbell's February 26, 2014 protective order, which states that "inquiry into the . . . financial records . . . of Terry Bollea . . . is hereby prohibited."

8. With respect to the subpoena directed to **Peter Young, Sovereign Talent Group**, Mr. Bollea objects to the subpoena on the grounds that it is overbroad, oppressive, and harassing; it is not reasonably calculated to lead to the discovery of admissible evidence; and it invades upon Plaintiff's constitutional privacy rights. Further, Mr. Bollea objects to the subpoena to the extent it seeks documents in violation of Judge Campbell's February 26, 2014 protective order, which states that "inquiry into the . . . financial records . . . of Terry Bollea . . . is hereby prohibited."

9. With respect to the subpoena directed to **TNA Entertainment, LLC**, Mr. Bollea objects to the subpoena on the grounds that it is overbroad, oppressive, and harassing; it is not reasonably calculated to lead to the discovery of admissible evidence; and it invades upon Plaintiff's constitutional privacy rights. Further, Mr. Bollea objects to the subpoena to the extent it seeks documents in violation of Judge Campbell's February 26, 2014 protective order, which states that "inquiry into the . . . financial records . . . of Terry Bollea . . . is hereby prohibited."

10. Pursuant to Rule 1.351(b) of the Florida Rules of Civil Procedure, because Mr. Bollea served this objection to the production sought in the subpoenas, "the documents or things shall not be produced pending the resolution of the objection...."

DATED: July 17, 2014

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DAULERIO; KATE BENNERT, and  
BLOGWIRE HUNGARY SZELLEMI  
ALKOTAST HASZNOSITO KFT aka  
GAWKER MEDIA,

Defendants.

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**OBJECTIONS OF TERRY BOLLEA TO MOTION FOR COMMISSION  
FOR OUT-OF-STATE SUBPOENA TO DARREN PRINCE  
AND MOTION FOR PROTECTIVE ORDER**

Plaintiff, Terry Gene Bollea (“Mr. Bollea”), by counsel, pursuant to Rules 1.350, 1.351, 1.410 and 1.280(c) of the Florida Rules of Civil Procedure, files this Objection to Gawker Media, LLC’s (“Gawker”) July 8, 2014 Motion for Commission for Out-of-State Subpeona for the issuance of a subpoena for documents with deposition to non-party **Darren Prince**, and moves for the entry of a protective order precluding or limiting the taking of the deposition and the production of documents identified in the subpoena. Plaintiff states in support as follows:

1. Mr. Bollea objects to the issuance of the subpoena and commission because it exceeds the scope of permissible discovery in this action. Based on the broad



categories of documents Gawker seeks, the subpoena is overbroad, oppressive, and harassing; it is not reasonably calculated to lead to the discovery of admissible evidence; and it invades upon Plaintiff's constitutional privacy rights. Further, Mr. Bollea objects to the subpoena to the extent it seeks documents in violation of Judge Campbell's February 26, 2014 protective order, which states that "inquiry into the . . . financial records . . . of Terry Bollea . . . is hereby prohibited."

2. Mr. Bollea also objects to the taking of the deposition sought through the subpoena because the anticipated scope of the deposition (based on Gawker's other contemporaneous filings and the areas of testimony referenced in Gawker's motion) is overbroad, oppressive, and harassing; it is not reasonably calculated to lead to the discovery of admissible evidence; and may invade upon Plaintiff's constitutional privacy rights. Further, Mr. Bollea objects to the deposition to the extent it will seek information in violation of Judge Campbell's February 26, 2014 protective order, which states that "inquiry into the . . . financial records . . . of Terry Bollea . . . is hereby prohibited."

3. Mr. Bollea also moves for a protective order precluding or limiting the scope of the deposition and subpoena pursuant to Rule 1.280(c) of the Florida Rules of Civil Procedure on these same grounds. A court may make any order to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense that justice requires regarding discovery matters. Fla. R. Civ. P. 1.280(c). "In deciding whether a protective order is appropriate in a particular case, the court must balance the competing interest that would be served by granting discovery or by denying it." *Rasmussen v. Fla. Blood Serv., Inc.*, 500 So.2d 533, 535 (Fla. 1987).

4. Pursuant to Rule 1.351(b) of the Florida Rules of Civil Procedure, because Mr. Bollea served this objection to the production sought in the subpoena, “the documents or things shall not be produced pending the resolution of the objection....”

DATED: July 17, 2014

*/s/ Kenneth G. Turkel*

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ALKOTAST HASZNOSITO KFT aka  
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Defendants.

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**OBJECTIONS OF TERRY BOLLEA TO MOTION FOR COMMISSION  
FOR OUT-OF-STATE SUBPOENA TO PRINCE MARKETING GROUP  
AND MOTION FOR PROTECTIVE ORDER**

Plaintiff, Terry Gene Bollea (“Mr. Bollea”), by counsel, pursuant to Rules 1.350, 1.351, 1.410 and 1.280(c) of the Florida Rules of Civil Procedure, files this Objection to Gawker Media, LLC’s (“Gawker”) July 8, 2014 Motion for Commission for Out-of-State Subpeona for the issuance of a subpoena for documents with deposition to non-party **Prince Marketing Group**, and moves for the entry of a protective order precluding or limiting the taking of the deposition and the production of documents identified in the subpoena. Plaintiff states in support as follows:

1. Mr. Bollea objects to the issuance of the subpoena and commission because it exceeds the scope of permissible discovery in this action. Based on the broad

categories of documents Gawker seeks, the subpoena is overbroad, oppressive, and harassing; it is not reasonably calculated to lead to the discovery of admissible evidence; and it invades upon Plaintiff's constitutional privacy rights. Further, Mr. Bollea objects to the subpoena to the extent it seeks documents in violation of Judge Campbell's February 26, 2014 protective order, which states that "inquiry into the . . . financial records . . . of Terry Bollea . . . is hereby prohibited."

2. Mr. Bollea objects to the deposition sought through the subpoena because the Topics for Deposition listed in Schedule B are overbroad, oppressive, and harassing; they are not reasonably calculated to lead to the discovery of admissible evidence; and they invade upon Plaintiff's constitutional privacy rights. Further, Mr. Bollea objects to the Topics to the extent they seek information in violation of Judge Campbell's February 26, 2014 protective order, which states that "inquiry into the . . . financial records . . . of Terry Bollea . . . is hereby prohibited."

3. Mr. Bollea also moves for a protective order precluding or limiting the scope of the deposition and subpoena pursuant to Rule 1.280(c) of the Florida Rules of Civil Procedure on these same grounds. A court may make any order to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense that justice requires regarding discovery matters. Fla. R. Civ. P. 1.280(c). "In deciding whether a protective order is appropriate in a particular case, the court must balance the competing interest that would be served by granting discovery or by denying it." *Rasmussen v. Fla. Blood Serv., Inc.*, 500 So.2d 533, 535 (Fla. 1987).

4. Pursuant to Rule 1.351(b) of the Florida Rules of Civil Procedure, because Mr. Bollea served this objection to the production sought in the subpoena, “the documents or things shall not be produced pending the resolution of the objection....”

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Defendants.

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**OBJECTIONS OF TERRY BOLLEA TO MOTION FOR LETTER  
ROGATORY AND COMMISSION FOR OUT-OF-STATE SUBPOENA TO  
WORLD WRESTLING ENTERTAINMENT, INC. AND  
MOTION FOR PROTECTIVE ORDER**

Plaintiff, Terry Gene Bollea (“Mr. Bollea”), by counsel, pursuant to Rules 1.350, 1.351, 1.410 and 1.280(c) of the Florida Rules of Civil Procedure, files this Objection to Gawker Media, LLC’s (“Gawker”) July 8, 2014 Motion for Letter Rogatory and Commission for Out-of-State Subpeona for the issuance of a subpoena for documents with deposition to non-party **World Wrestling Entertainment, Inc.**, and moves for the entry of a protective order precluding or limiting the taking of the deposition and the production of documents identified in the subpoena. Plaintiff states in support as follows:



1. Mr. Bollea objects to the issuance of the subpoena and commission because it exceeds the scope of permissible discovery in this action. Based on the broad categories of documents Gawker seeks, the subpoena is overbroad, oppressive, and harassing; it is not reasonably calculated to lead to the discovery of admissible evidence; and it invades upon Plaintiff's constitutional privacy rights. Further, Mr. Bollea objects to the subpoena to the extent it seeks documents in violation of Judge Campbell's February 26, 2014 protective order, which states that "inquiry into the . . . financial records . . . of Terry Bollea . . . is hereby prohibited."

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3. Mr. Bollea also moves for a protective order precluding or limiting the scope of the deposition and subpoena pursuant to Rule 1.280(c) of the Florida Rules of Civil Procedure on these same grounds. A court may make any order to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense that justice requires regarding discovery matters. Fla. R. Civ. P. 1.280(c). "In deciding whether a protective order is appropriate in a particular case, the court must balance the competing interest that would be served by granting discovery or by denying it." *Rasmussen v. Fla. Blood Serv., Inc.*, 500 So.2d 533, 535 (Fla. 1987).

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