

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.

**OBJECTIONS OF TERRY BOLLEA TO NOTICE OF INTENT TO SERVE
SUBPOENA FOR PRODUCTION OF DOCUMENTS WITHOUT DEPOSITION
IN ANOTHER STATE AND PROPOSED NON-PARTY SUBPOENA**

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”) September 18, 2014 Notice of Intent to Serve Subpoena for Production of Documents without Deposition in Another State and the corresponding proposed Subpoena Duces Tecum without Deposition directed towards David Houston (a Nevada resident) submitted therewith. In support of Plaintiff’s objections, Plaintiff states as follows:

1. The requests are directed to Plaintiff’s litigation counsel and seek documents directly relating to this litigation and other potential lawsuits. As such, the

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requests impermissibly seek documents protected by the attorney-client privilege, the work product doctrine, the common interest doctrine and/or the settlement privilege. (For example, the requests seek all communications between Mr. Houston and Bubba Clem's attorneys, and all communications between Mr. Houston and Heather Clem's attorneys, regarding the lawsuit.)

2. Plaintiff objects to the subpoena on the grounds that it is overbroad in scope and time, does not identify the documents requested with sufficient particularity, unduly burdensome, 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. (For example, the requests seek all documents that relate to Mr. Bollea and his public relations consultants, all documents that relate to Mr. Bollea and TNA, and all communications with any media outlet regarding Mr. Bollea.)

3. 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...." A privilege log is not required until such time as Plaintiff's broader, preliminary objections have been addressed. *Gosman v. Luzinski*, 937 So.2d 293 (Fla. 4th DCA 2006).

DATED: October 3, 2014

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by E-Mail via the e-portal system this 3rd day of October, 2014 to the following:

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