

# **EXHIBIT 7**

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.

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**DEFENDANT GAWKER MEDIA, LLC'S RESPONSES TO  
PLAINTIFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS**

Pursuant to Florida Rule of Civil Procedure 1.350, Defendant Gawker Media, LLC ("Gawker") hereby provides this response to Plaintiff's Second Request for Production of Documents dated June 27, 2013.

**DEFINITIONS**

1. The "Video" means the video and audio footage depicting Plaintiff Terry Gene Bollea that he claims was made without his consent in or about 2006 at issue in this lawsuit.
2. The "Gawker Story" means the story entitled "Even For a Minute, Watching Hulk Hogan Have Sex on a Canopy Bed is Not Safe For Work, But Watch It Anyway" published on www.gawker.com on or about October 4, 2012.
3. The "Excerpts" means the video file that was posted in connection with the Gawker Story, consisting of 101 seconds of footage excerpted from the Video.

**REQUESTS AND RESPONSES**

**REQUEST NO. 89:** All Documents that describe the role, function and/or line of business of Gawker Media, LLC, Gawker Media Group, Inc., Gawker Entertainment LLC,

Gawker Technology, LLC, Gawker Sales, LLC, Blogwire Hungary Szellemi Alkotast Hasznosito KFT, and/or their affiliates.

**RESPONSE:** Gawker objects to this Request on the grounds that it (a) is overly broad and unduly burdensome in that it seeks the production of “all documents” describing six separate companies “and/or their affiliates,” and (b) seeks the production of documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, as confirmed by Gawker’s Responses to Plaintiff’s Interrogatory Nos. 11 and 12 (explaining under oath the role and function of Gawker Media, LLC; that Gawker Media, LLC is the publisher of the Gawker Story; and that no other entity participated in any way in writing, editing or publishing the Gawker Story, or in receiving or editing the Video from which the Excerpts accompanying the Gawker Story were derived). Gawker further objects to this Request to the extent that it seeks the production of documents protected from discovery by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine. Subject to and without waiving these objections, Gawker directs Plaintiff to Gawker’s Responses to Interrogatory Nos. 11 and 12, as well as publicly available documents describing Gawker Media, LLC, such as <http://advertising.gawker.com/about/>.

**REQUEST NO. 90:** All Documents that describe the role or function of Gawker Media, LLC, Gawker Media Group, Inc., Gawker Entertainment LLC, Gawker Technology, LLC, Gawker Sales, LLC, Blogwire Hungary Szellemi Alkotast Hasznosito KFT, and/or their affiliates, with respect to the publication of material on Gawker.com.

**RESPONSE:** Gawker objects to this Request on the grounds that it (a) is overly broad and unduly burdensome in that it seeks the production of “all documents” describing information with respect to six separate companies “and/or their affiliates,” and (b) seeks the production of

documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, as confirmed by Gawker's Responses to Plaintiff's Interrogatory Nos. 11 and 12 (explaining under oath the role and function of Gawker Media, LLC; that Gawker Media, LLC is the publisher of the Gawker Story; and that no other entity participated in any way in writing, editing or publishing the Gawker Story, or in receiving or editing the Video from which the Excerpts accompanying the Gawker Story were derived). Gawker further objects to this Request to the extent that it seeks the production of documents protected from discovery by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine. Subject to and without waiving these objections, Gawker directs Plaintiff to Gawker's Responses to Interrogatory Nos. 11 and 12, as well as publicly available documents describing Gawker Media, LLC, the publisher of Gawker.com, such as <http://advertising.gawker.com/about/>.

**REQUEST NO. 91:** All financial statements, including but not limited to balance sheets, income statements, and statements of changes in financial position, for Gawker Media, LLC, Gawker Media Group, Inc., Gawker Entertainment LLC, Gawker Technology, LLC, Gawker Sales, LLC, Blogwire Hungary Szellemi Alkotast Hasznosito KFT, and/or their affiliates, including any combined financial statements, covering all periods from January 1, 2010 through the present.

**RESPONSE:** Gawker objects to this Request on the grounds that it is overly broad and unduly burdensome in that it seeks the production of "all financial statements" of six separate companies "and/or their affiliates" for a three-and-a-half year period. Moreover, to the extent that this Request seeks the production of documents related to companies other than Gawker Media, LLC, Gawker objects on the grounds that such documents are neither relevant nor

reasonably calculated to lead to the discovery of admissible evidence, as confirmed by Gawker's Responses to Plaintiff's Interrogatory Nos. 11 and 12 (explaining under oath the role and function of Gawker Media, LLC; that Gawker Media, LLC is the publisher of the Gawker Story; and that no other entity participated in any way in writing, editing or publishing the Gawker Story, or in receiving or editing the Video from which the Excerpts accompanying the Gawker Story were derived). Subject to and without waiving these objections, Gawker will produce an income statement and balance sheet for Gawker Media, LLC from January 2010 through June 2013.

**REQUEST NO. 92:** All documents that relate to any and all financial transactions between or among Gawker Media, LLC, Gawker Media Group, Inc., Gawker Entertainment LLC, Gawker Technology, LLC, Gawker Sales, LLC, Blogwire Hungary Szellemi Alkotast Hasznosito KFT, and/or their affiliates, between January 1, 2010 through the present.

**RESPONSE:** Gawker objects to this Request on the grounds that it (a) is overly broad and unduly burdensome in that it seeks the production of "all documents that relate to any and all financial transactions" among six separate companies "and/or their affiliates" for a three-and-a-half year period, and (b) seeks the production of documents are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, as confirmed by Gawker's Responses to Plaintiff's Interrogatory Nos. 11 and 12 (explaining under oath the role and function of Gawker Media, LLC; that Gawker Media, LLC is the publisher of the Gawker Story; that no other entity participated in any way in writing, editing or publishing the Gawker Story, or in receiving or editing the Video from which the Excerpts accompanying the Gawker Story were derived; and the distribution of revenue and/or profits among various affiliated entities). Gawker further objects to this Request to the extent that it seeks the production of documents protected

from discovery by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine. Subject to and without waiving these objections, Gawker refers Plaintiff to the income statement and balance sheet for Gawker Media, LLC from January 2010 through June 2013, produced in response to Plaintiff's Document Request No. 91.

**REQUEST NO. 93:** All Documents that relate to the direct or indirect receipt of advertising revenue in connection with Gawker.com by Gawker Media, LLC, Gawker Media Group, Inc., Gawker Entertainment, LLC, Gawker Technology, LLC, Gawker Sales, LLC, Blogwire Hungary Szellemi Alkotast Hasznosito KFT, and/or their affiliates.

**RESPONSE:** Gawker objects to this Request on the grounds that it (a) is overly broad and unduly burdensome in that it seeks the production of "all documents" relating to "the direct or indirect receipt of advertising revenue" for an unlimited period of time; and (b) seeks the production of documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, as confirmed by Gawker's Responses to Plaintiff's Interrogatory Nos. 11 and 12 (explaining under oath the role and function of Gawker Media, LLC; that Gawker Media, LLC is the publisher of the Gawker Story; that no other entity participated in any way in writing, editing or publishing the Gawker Story, or in receiving or editing the Video from which the Excerpts accompanying the Gawker Story were derived; and the distribution of revenue and/or profits among various affiliated entities). Gawker further objects to this Request to the extent that it seeks the production of documents protected from discovery by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine. Gawker further objects to this Request as duplicative of Plaintiff's Request No. 38, which sought the production of "all documents that relate to all revenue generated by Gawker.com." Subject to and without waiving these objections, Gawker refers

Plaintiff to (a) the income statement for Gawker Media, LLC from January 2010 through June 2013, produced in response to Plaintiff's Document Request No. 91; (b) the documents Gawker produced in response to Plaintiff's Document Request No. 38, including without limitation the document Bates numbered Gawker 01147\_C (produced on July 25, 2013), which shows gawker.com's monthly revenues for 2012; and (c) Gawker's Responses to Plaintiff's Interrogatory No. 4 and Plaintiff's Document Request No. 36 concerning the advertising revenue (or lack thereof) received in connection with the publication of the Gawker Story and the Excerpts.

**REQUEST NO. 94:** All Documents that relate to any and all action by Blogwire Hungary with respect to Gawker.com and/or its content.

**RESPONSE:** Gawker objects to this Request on the grounds that it seeks the production of documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, as confirmed by Gawker's Responses to Plaintiff's Interrogatory Nos. 11 and 12 (explaining under oath the role and function of Gawker Media, LLC; that Gawker Media, LLC is the publisher of the Gawker Story; that no other entity participated in any way in writing, editing or publishing the Gawker Story, or in receiving or editing the Video from which the Excerpts accompanying the Gawker Story were derived; and the distribution of revenue and/or profits among various affiliated entities), and as such searching for and producing such documents presents an undue burden. Gawker further objects to this Request to the extent that it seeks the production of documents protected from discovery by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine.

**REQUEST NO. 95:** All Documents that relate to any and all action by Gawker Media Group, Inc. with respect to Gawker.com and/or its content.

**RESPONSE:** Gawker objects to this Request on the grounds that it seeks the production of documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, as confirmed by Gawker's Responses to Plaintiff's Interrogatory Nos. 11 and 12 (explaining under oath the role and function of Gawker Media, LLC; that Gawker Media, LLC is the publisher of the Gawker Story; that no other entity participated in any way in writing, editing or publishing the Gawker Story, or in receiving or editing the Video from which the Excerpts accompanying the Gawker Story were derived; and the distribution of revenue and/or profits among various affiliated entities), and as such searching for and producing such documents presents an undue burden. Gawker further objects to this Request to the extent that it seeks the production of documents protected from discovery by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine.

**REQUEST NO. 96:** All Documents that relate to any and all action by Gawker Entertainment, LLC with respect to Gawker.com and/or its content.

**RESPONSE:** Gawker objects to this Request on the grounds that it seeks the production of documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, as confirmed by Gawker's Responses to Plaintiff's Interrogatory Nos. 11 and 12 (explaining under oath the role and function of Gawker Media, LLC; that Gawker Media, LLC is the publisher of the Gawker Story; that no other entity participated in any way in writing, editing or publishing the Gawker Story, or in receiving or editing the Video from which the Excerpts accompanying the Gawker Story were derived; and the distribution of revenue and/or profits among various affiliated entities), and as such searching for and producing such



documents presents an undue burden. Gawker objects to this Request to the extent that it seeks the production of documents protected from discovery by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine.

**REQUEST NO. 97:** All Documents that relate to any and all action by Gawker Technology, LLC with respect to Gawker.com and/or its content.

**RESPONSE:** Gawker objects to this Request on the grounds that it seeks the production of documents are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, as confirmed by Gawker's Responses to Plaintiff's Interrogatory Nos. 11 and 12 (explaining under oath the role and function of Gawker Media, LLC; that Gawker Media, LLC is the publisher of the Gawker Story; that no other entity participated in any way in writing, editing or publishing the Gawker Story, or in receiving or editing the Video from which the Excerpts accompanying the Gawker Story were derived; and the distribution of revenue and/or profits among various affiliated entities), and as such searching for and producing such documents presents an undue burden. Gawker further objects to this Request to the extent that it seeks the production of documents protected from discovery by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine.

**REQUEST NO. 98:** All Documents that relate to any and all action by Gawker Sales, LLC with respect to Gawker.com and/or its content.

**RESPONSE:** Gawker objects to this Request on the grounds that it seeks the production of documents are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, as confirmed by Gawker's Responses to Plaintiff's Interrogatory Nos. 11 and 12 (explaining under oath the role and function of Gawker Media, LLC; that Gawker Media, LLC is the publisher of the Gawker Story; that no other entity participated in any way in writing,

editing or publishing the Gawker Story, or in receiving or editing the Video from which the Excerpts accompanying the Gawker Story were derived; and the distribution of revenue and/or profits among various affiliated entities), and as such searching for and producing such documents presents an undue burden. Gawker objects to this Request to the extent that it seeks the production of documents protected from discovery by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine.

**REQUEST NO. 99:** Documents sufficient to show all revenues received by Gawker Media, LLC, since January 1, 2012, and/or the basis for its receipt of such revenues.

**RESPONSE:** Gawker objects to this Request to the extent that it seeks the production of documents concerning the “basis” for Gawker’s receipt of “all revenues” on the grounds that the Request is overly broad, unduly burdensome, and requests information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

To the extent that this Request seeks the production of documents sufficient to show revenues generated by to gawker.com, Gawker objects on the grounds that it duplicative of Plaintiff’s Document Request No. 38. Subject to and without waiving these objections, Gawker refers Plaintiff to, and incorporates by reference, its Response to Plaintiff’s Document Request No. 38, including without limitation the document Bates numbered, Gawker 01147\_C (produced on July 25, 2013), which shows gawker.com’s monthly revenues for 2012.

To the extent that this Request seeks the production of documents relating to revenue generated by other websites, which are at not at issue in this lawsuit, Gawker objects on the grounds that (a) this Request is duplicative of Plaintiff’s Document Request No. 40, and (b) such documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

**REQUEST NO. 100:** Documents sufficient to show all revenues, compensation, funding and/or assets received by Gawker Media Group, Inc. since January 1, 2012, and/or the basis for its receipt of revenues, compensation, funding and/or assets.

**RESPONSE:** Gawker objects to this Request on the grounds that it calls for Gawker Media, LLC to produce documents in the possession of a separate corporate entity, which is not a served defendant in this lawsuit and which had nothing to do with the publication of the Gawker Story or the Excerpts at issue. Further, Gawker objects to this Request on the grounds that it seeks the production of documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, as confirmed by Gawker's Responses to Plaintiff's Interrogatory Nos. 11 and 12 (explaining under oath the role and function of Gawker Media, LLC; that Gawker Media, LLC is the publisher of the Gawker Story; that no other entity participated in any way in writing, editing or publishing the Gawker Story, or in receiving or editing the Video from which the Excerpts accompanying the Gawker Story were derived; and the distribution of revenue and/or profits among various affiliated entities). Gawker further objects on the grounds that the Request is overly broad and unduly burdensome in that it seeks the production of documents related to "all revenues, compensation, funding and/or assets" and the "basis" for such "revenues, compensation, funding and/or assets."

**REQUEST NO. 101:** Documents sufficient to show all revenues, compensation, funding and/or assets received by Gawker Entertainment, LLC since January 1, 2012, and/or the basis for its receipt of revenues, compensation, funding and/or assets.

**RESPONSE:** Gawker objects to this Request on the grounds that it calls for Gawker Media, LLC to produce documents in the possession of a separate corporate entity, which is now dissolved, which is not a served defendant in this lawsuit and which had nothing to do with the

publication of the post at issue. Further, Gawker objects to this Request on the grounds that it seeks the production of documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, as confirmed by Gawker's Responses to Plaintiff's Interrogatory Nos. 11 and 12 (explaining under oath the role and function of Gawker Media, LLC; that Gawker Media, LLC is the publisher of the Gawker Story; that no other entity participated in any way in writing, editing or publishing the Gawker Story, or in receiving or editing the Video from which the Excerpts accompanying the Gawker Story were derived; and the distribution of revenue and/or profits among various affiliated entities). Gawker further objects on the grounds that the Request is overly broad and unduly burdensome in that it seeks the production of documents related to "all revenues, compensation, funding and/or assets" and the "basis" for such "revenues, compensation, funding and/or assets."

**REQUEST NO. 102:** Documents sufficient to show all revenues, compensation, funding and/or assets received by Gawker Technology, LLC since January 1, 2012, and/or the basis for its receipt of revenues, compensation, funding and/or assets.

**RESPONSE:** Gawker objects to this Request on the grounds that it calls for Gawker Media, LLC to produce documents in the possession of a separate corporate entity, which is now dissolved, which is not a served defendant in this lawsuit and which had nothing to do with the publication of the post at issue. Further, Gawker objects to this Request on the grounds that it seeks the production of documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, as confirmed by Gawker's Responses to Plaintiff's Interrogatory Nos. 11 and 12 (explaining under oath the role and function of Gawker Media, LLC; that Gawker Media, LLC is the publisher of the Gawker Story; that no other entity participated in any way in writing, editing or publishing the Gawker Story, or in receiving or

editing the Video from which the Excerpts accompanying the Gawker Story were derived; and the distribution of revenue and/or profits among various affiliated entities). Gawker further objects on the grounds that the Request is overly broad and unduly burdensome in that it seeks the production of documents related to “all revenues, compensation, funding and/or assets” and the “basis” for such “revenues, compensation, funding and/or assets.”

**REQUEST NO. 103:** Documents sufficient to show all revenues, compensation, funding and/or assets received by Gawker Sales, LLC since January 1, 2012, and/or the basis for its receipt of revenues, compensation, funding and/or assets.

**RESPONSE:** Gawker objects to this Request on the grounds that it calls for Gawker Media, LLC to produce documents in the possession of a separate corporate entity, which is now dissolved, which is not a served defendant in this lawsuit and which had nothing to do with the publication of the post at issue. Further, Gawker objects to this Request on the grounds it seeks the production of documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, as confirmed by Gawker’s Responses to Plaintiff’s Interrogatory Nos. 11 and 12 (explaining under oath the role and function of Gawker Media, LLC; that Gawker Media, LLC is the publisher of the Gawker Story; that no other entity participated in any way in writing, editing or publishing the Gawker Story, or in receiving or editing the Video from which the Excerpts accompanying the Gawker Story were derived; and the distribution of revenue and/or profits among various affiliated entities). Gawker further objects on the grounds that the Request is overly broad and unduly burdensome in that it seeks the production documents related to “all revenues, compensation, funding and/or assets” and the “basis” for such “revenues, compensation, funding and/or assets.”

**REQUEST NO. 104:** Documents sufficient to show all revenues, compensation, funding and/or assets received by Blogwire Hungary since January 1, 2012, and/or the basis for its receipt of revenues, compensation, funding and/or assets.

**RESPONSE:** Gawker objects to this Request on the grounds that it calls for Gawker Media, LLC to produce documents in the possession of a separate corporate entity, which is not a served defendant in this lawsuit and which had nothing to do with the publication of the post at issue. Further, Gawker objects to this Request on the grounds that it seeks the production of documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, as confirmed by Gawker's Responses to Plaintiff's Interrogatory Nos. 11 and 12 (explaining under oath the role and function of Gawker Media, LLC; that Gawker Media, LLC is the publisher of the Gawker Story; that no other entity participated in any way in writing, editing or publishing the Gawker Story, or in receiving or editing the Video from which the Excerpts accompanying the Gawker Story were derived; and the distribution of revenue and/or profits among various affiliated entities). Gawker further objects on the grounds that the Request is overly broad and unduly burdensome in that it seeks the production of documents related to "all revenues, compensation, funding and/or assets" and the "basis" for such "revenues, compensation, funding and/or assets."

**REQUEST NO. 105:** All Documents that Relate to Communications between Gawker, on the one hand, and any vendor engaged to conduct, assist in, or otherwise participate in any electronic discovery, computer searches, or database management with respect to Documents that are relevant to this Action.

**RESPONSE:** Gawker objects to this Request on the grounds that it seeks the production of documents protected from disclosure by privilege, including but not limited to the attorney-

client privilege and the attorney work product doctrine. Gawker further objects on the grounds that a Request for “*all* documents that relate to communications between Gawker” and its vendors is overly broad, unduly burdensome, and requests information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, and without conceding that any of the documents requested by Plaintiff and produced by Gawker are necessarily “relevant to this Action,” Gawker will produce (1) a list of the individuals whose computers and emails were searched by its vendor in connection with Gawker’s Responses to Plaintiff’s First Request for Production of Documents, and (2) a list of the search terms used by the vendor in connection therewith

**REQUEST NO. 106:** All Documents that Relate to any protocols, instructions, or search criteria relating to any electronic discovery, computer searches, or database management conducted or assisted by any vendor with respect to documents that are relevant to this Action.

**RESPONSE:** Gawker objects to this Request on the grounds that it seeks the production of documents protected from disclosure by privilege, including but not limited to the attorney-client privilege and the attorney work product doctrine. Gawker further objects on the grounds that a Request for “*all* documents” related to its electronic discovery efforts is overly broad, unduly burdensome, and requests information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, and without conceding that any of the documents requested by Plaintiff and produced by Gawker are necessarily “relevant to this Action,” Gawker will produce (1) a list of the individuals whose computers and emails were searched by its vendor in connection with Gawker’s Responses to Plaintiff’s First Request for Production of Documents, and (2) a list of the search terms used by the vendor in connection therewith.

Dated: August 12, 2013

THOMAS & LOCICERO PL

By: /s/ Gregg D. Thomas

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 12th day of August 2013, I caused a true and correct copy of the foregoing to be served by email upon the following counsel of record:

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