

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 GAWKER MEDIA, LLC'S SIXTH
REQUEST FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF**

Pursuant to Rule 1.350 of the Florida Rules of Civil Procedure, defendant Gawker Media, LLC, ("Gawker") by its undersigned counsel, hereby requests that plaintiff Terry Gene Bollea produce for inspection and copying the following documents and things within thirty (30) days after service of this request.

Instructions and Definitions

1. "You" and "your" mean the plaintiff Terry Gene Bollea, and any agents, attorneys, or other persons or entities acting for or on behalf of him or in concert with him, including without limitation any personal services corporations that make available or license services of plaintiff. The request seeks all information in the possession, custody or control of all such persons and/or entities.
2. "Terry Bollea" means Terry Gene Bollea (professionally known as "Hulk Hogan").
3. "Hulk Hogan" means the character played by Terry Bollea.

4. “Media” includes television, radio, newspapers, magazines, websites, mobile apps, and any other form of mass communication.

5. The “Lawsuit” means any legal proceeding instituted against Gawker Media, LLC, Bubba Clem, or Heather Clem by Terry Bollea relating to the Gawker Story.

6. The words “and” and “or” also have the meaning “and/or.”

7. The terms “all” and “any” shall be considered to include “each” and “every.” Use of any of these terms incorporates them all.

8. The term “person” means all individuals and entities.

9. The term “document(s)” means all writings and recordings, including the originals and all non-identical copies, whether different from the original by reason of any notation made on such copies or otherwise (including but without limitation to, email and attachments, “instant” messages or “IM” messages, “wall” postings on Facebook, Myspace postings, Twitter postings or “tweets,” correspondence, memoranda, notes, diaries, minutes, statistics, letters, telegrams, contracts, reports, studies, checks, statements, tags, labels, invoices, brochures, periodicals, telegrams, receipts, returns, summaries, pamphlets, books, interoffice and intraoffice communications, offers, notations of any sort of conversations, working papers, applications, permits, file wrappers, indices, telephone calls, meetings or printouts, teletypes, telefax, invoices, worksheets, and all drafts, alterations, modifications, changes and amendments of any of the foregoing), graphic or aural representations of any kind (including without limitation, photographs, charts, microfiche, microfilm, videotape, recordings, motion pictures, plans, drawings, surveys), and electronic, mechanical, magnetic, optical or electric records or representations of any kind (including without limitation, computer files and programs, tapes, cassettes, discs, recordings), including metadata.

10. Throughout this request, the singular shall include the plural and the plural shall include the singular.

11. The following terms should be read as if they were synonymous, and each should be taken to include the meaning of all of the others: relating to, related in any manner to, concerning, referring to, alluding to, responding to, connected with, with respect to, commenting on, about, regarding, announcing, explaining, discussing, showing, describing, studying, reflecting, analyzing or constituting.

12. If you contend that it would be unreasonably burdensome to produce all the documents called for in response to any request, you should:

- (a) produce all documents that are available without unreasonable burden; and
- (b) describe with particularity the reasons why production of the remaining documents would be unreasonably burdensome.

13. In the event that any responsive document cannot be produced in its entirety, you are requested to produce the document to the fullest extent possible, specifying the reasons for your inability to produce the remainder and describing to the fullest extent possible the contents of the unproduced portion.

14. With respect to your responses to the following request for production, if any document or any portion of any document is withheld because of a claim of privilege, please state the basis for your claim of privilege with respect to such document or portion of any document and the specific ground(s) on which the claim of privilege rests, and including, with respect to documents: the date appearing on the document, or if no date appears, the date on which the document was prepared; the name of the person(s) to whom the document was addressed; the name of each person, other than addressee(s), to whom the document, or a copy

thereof, was sent or with whom the document was discussed; the name of the person(s) who signed the document, or if not signed, the name of the person(s) who prepared it; the name of each person making any contribution to the authorship of the document; and the general nature or description of the document and the number of pages of which it consists.

15. In the event that any documents or things that would have been responsive to this request have been destroyed, discarded or lost, please identify each such document or thing, including: the nature of the document or thing; the author(s) and addressee(s) of any document; any indicated or blind copies of any document; the document's subject matter, number of pages and attachments or appendices; all persons to whom the document was distributed or persons who have seen the thing; the date of destruction, discard or loss; and, if destroyed or discarded, the reasons therefore and the identity of the person(s) authorizing or carrying out any such destruction or discard.

Requests for Production

Request No. 74: For each request for production of documents previously propounded to you by Gawker or any of the other defendants in this action, produce any responsive documents within your possession, custody, and control that have not previously been produced.

Request No. 75: To the extent not produced previously in this litigation, all documents reflecting, referring, or relating to statements concerning this action or its subject matter made by you, any party to this action, or any witness identified in any of the parties' initial witness lists filed on March 2, 2015.

Request No. 76: To the extent not produced previously in this litigation, all documents you intend to introduce at the trial of this case.

Request No. 77: All documents and communications referring or relating to the video previously posted at https://www.youtube.com/watch?v=RslL8bLD6yw&desktop_uri=%2Fwatch%3Fv%3DRslL8bLD6yw&app=desktop and the copyright claim referenced on that website as reflected in the document attached as Exhibit A, including, but not limited to, the video and the copyright claim you sent.

Request No. 78: All documents referring to, relating to, or reflecting communications between you and any reporter, journalist, producer, photographer, television or radio booker, or any other person employed by or working on behalf of any media referring or relating to the lawsuit or the subject matter of the lawsuit.

Request No. 79: All press releases, media alerts, and statements to the media referring or relating to the lawsuit or the subject matter of the lawsuit sent or distributed by you,

as well as documents sufficient to show all people or entities who received the press release, media alert, or statement to the media.

Request No. 80: To the extent not produced previously, all documents that reflect, refer, relate, pertain, support or refute your claimed damages in this lawsuit.

Respectfully submitted,
THOMAS & LOCICERO PL

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 5th day of March, 2015, I caused a true and correct copy of the foregoing to be served electronically upon the following counsel of record at their respective email addresses via the Florida Courts E-Filing Portal:

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