

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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**PLAINTIFF'S THIRD REQUESTS FOR ADMISSION  
TO DEFENDANT GAWKER MEDIA, LLC**

Plaintiff Terry Gene Bollea, professionally known as Hulk Hogan ("PLAINTIFF"), by counsel and pursuant to Florida Rule of Civil Procedure 1.370, requests Defendant Gawker Media ("GAWKER") to admit the truth of the following matters of fact within 30 days from the certificate of service.

**I. INSTRUCTIONS and DEFINITIONS**

A. In answering these requests for admission, you are to respond truthfully and in good faith on the basis of all information that is presently available to you, regardless of whether such information was obtained directly by you, by your attorneys, their agents, employees or investigators.

B. If good faith requires that you deny only a portion of any matter as to which an admission is requested, or that you qualify your response to any given request for admission, specify and admit so much of the request as is true and deny or qualify only that portion of the request as to which good faith requires a denial or qualification.

C. Each request shall be answered fully unless it is in good faith objected to, in which event the reasons for your objection shall be stated in detail. If an objection pertains to only a portion of a request, or a word, phrase, or clause contained within it, you are required to state your objection to that portion only and to respond to the remainder of the request, using your best efforts to do so. Your response hereto is to be signed and verified by the person making it, and the objections signed by the attorney making them.

D. You may not give lack of information or knowledge as a reason for failure to admit or deny unless you state in writing that you have made reasonable inquiry and that the information known or readily obtainable by you is insufficient to enable you to admit or deny.

E. Should you discover that any response to the requests for admission propounded herein was incorrect when made, you shall upon such discovery or determination amend such response.

F. “YOU” or “YOUR” or “GAWKER” means Defendant Gawker Media, LLC and its members, shareholders, managers, executives, officers, board members, employees, agents, representatives, attorneys, and all other PERSONS acting on any of their respective behalves.

G. “COMMUNICATION(S)” means any correspondence, contact, discussion, or exchange between any two or more PERSONS. Without limiting the foregoing, “COMMUNICATION(S)” includes all DOCUMENTS, telephone conversations or face to face conversations, meetings and conferences.

H. “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,” blog postings, 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.

I. “ENTITY” means any firm, partnership, association, proprietorship, joint venture, corporation, governmental agency, or other organization or legal or business entity, as well as any agents, attorneys and consultants therefor, and all other PERSONS acting or purporting to act on its behalf.

J. “LAWSUIT” means the above titled action.

K. “PERSON” means any individual, firm, partnership, association, proprietorship, joint venture, corporation, governmental agency, or other organization or legal or business entity,

as well as any agents, attorneys and consultants therefor, and all other PERSONS acting or purporting to act on its behalf.

L. "POSTED SEX VIDEO" means the one minute forty-one second long video that was initially made available at <http://gawker.com/5948770/even-for-a-minute-watching-hulk-hogan-have-sex-in-a-canopy-bed-is-not-safe-for-work-but-watch-it-anyway>.

M. A separate answer shall be furnished for each request.

## II. REQUESTS FOR ADMISSION

25. Admit that every DOCUMENT YOU produced in the LAWSUIT is authentic.

26. Admit that every DOCUMENT bearing a GAWKER Bates-label produced in the LAWSUIT is authentic.

27. Admit that the POSTED SEX VIDEO, or some portion of it, was available at each webpage URL listed in the attached Exhibit 1 at any time from October 4, 2012 to present.

28. Admit that each DOCUMENT listed in the attached Exhibit 2 is a business record under Fla. Stat. §90.803(b).

29. Admit that each DOCUMENT listed in the attached Exhibit 2 is authentic.

DATED: March 11, 2015

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-and-

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Counsel for Plaintiff

**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 and by facsimile this 11th day of March, 2015 to the following:

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*/s/ Kenneth G. Turkel*  
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