

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
SECOND REQUEST FOR ADMISSION TO PLAINTIFF

Pursuant to Rule 1.370 of the Florida Rules of Civil Procedure, defendant Gawker Media, LLC ("Gawker"), by its undersigned counsel, hereby requests that plaintiff Terry Gene Bollea admit the matters set forth below within thirty (30) days after service of this request.

Definitions

1. "You" and "your" mean the plaintiff Terry Gene Bollea.
2. "Terry Bollea" means Terry Gene Bollea (professionally known as "Hulk Hogan").
3. "Asterisked File" means an audio and/or video file listed in the attached Exhibit A that has an asterisk (*) next to the file name.

Requests for Production

Request No. 22: Admit that each of the documents identified in the attached Exhibit A is authentic. Please note that this request for admission excludes those documents that have been stricken through (*i.e.*, Documents Nos. 19 and 59 under the heading “ARTICLES,” No. 3 under the heading “VIDEO FILES ON FLASH DRIVE BATES-LABELED GAWKER 23420,” and Nos. 10 and 15 under the heading “AUDIO FILES ON FLASH DRIVE BATES-LABELED GAWKER 23417”).

Request No. 23: Admit that each of the documents identified in the attached Exhibit B is authentic.

Request No. 24: Admit that for each Asterisked File, the person or voice identified in the audio and/or video file as being “Hulk Hogan” or “Terry Bollea” is you or your voice.

Request No. 25: Admit that BOLLEA002016 through BOLLEA002639 are business records under Fla. Stat. § 90.803(b).

Respectfully submitted,
THOMAS & LOCICERO PL

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Counsel for Gawker Media, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 11th day of March, 2015, I caused a true and correct copy of the foregoing to be served by email and facsimile upon the following counsel of record:

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