

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 RESPONSES TO
PLAINTIFF'S THIRD REQUEST FOR ADMISSIONS**

Pursuant to Florida Rule of Civil Procedure 1.370, Defendant Gawker Media, LLC
("Gawker") hereby provides this response to Plaintiff's Third Request for Admissions, dated
March 11, 2015.

REQUESTS AND RESPONSES

REQUEST NO. 25: Admit that every DOCUMENT YOU produced in the LAWSUIT
is authentic.

RESPONSE: The parties have agreed that, at the close of fact discovery, they will work
to stipulate as to the authenticity of certain documents, audio, and video files, based on affidavits
provided by the relevant persons involved in obtaining and/or preserving such documents. As
that process is ongoing, and not all affidavits have been exchanged, Gawker lacks sufficient
information to admit or deny this Request. In giving this Response, Gawker does not waive, and
expressly preserves, any objections it may later assert to the admissibility of evidence.

REQUEST NO. 26: Admit that every DOCUMENT bearing a Gawker Bates-label
produced in the LAWSUIT is authentic.

RESPONSE: The parties have agreed that, at the close of fact discovery, they will work to stipulate as to the authenticity of certain documents, audio, and video files, based on affidavits provided by the relevant persons involved in obtaining and/or preserving such documents. As that process is ongoing, and not all affidavits have been exchanged, Gawker lacks sufficient information to admit or deny this Request. In giving this Response, Gawker does not waive, and expressly preserves, any objections it may later assert to the admissibility of evidence.

REQUEST NO. 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.

RESPONSE: Gawker objects to the extent that the phrases “available at each webpage URL” and “at any time from October 4, 2012 to present” in Request No. 27 are vague and ambiguous. Subject to that objection, Gawker responds by referring to, and incorporating by reference, the Joint Stipulation Regarding The Ability To View The Gawker-edited Video At Third-Party Websites, filed on March 25, 2015, and further states that it lacks sufficient information to admit or deny the remainder of the Request. In giving this Response, Gawker does not waive, and expressly preserves, any objections it may later assert to the admissibility of any evidence.

REQUEST NO. 28: Admit that each DOCUMENT listed in the attached Exhibit 2 is a business record under Fla. Stat. § 90.803(b).

RESPONSE: The parties have agreed that, at the close of fact discovery, they will work to stipulate concerning whether certain documents, audio, and video files constitute business records. As that process is ongoing, Gawker lacks sufficient information to admit or deny this Request, and, based on information and belief, denies that each document listed Exhibit 2 is a

business record under Fla. Stat. § 90.803(b). In giving this Response, Gawker does not waive, and expressly preserves, any objections it may later assert to the admissibility of evidence.

REQUEST NO. 29: Admit that each DOCUMENT listed in the attached Exhibit 2 is authentic.

RESPONSE: The parties have agreed that, at the close of fact discovery, they will work to stipulate as to the authenticity of certain documents, audio, and video files, based on affidavits provided by the relevant persons involved in obtaining and/or preserving such documents. As that process is ongoing, and not all affidavits have been exchanged, Gawker lacks sufficient information to admit or deny this Request. In giving this Response, Gawker does not waive, and expressly preserves, any objections it may later assert to the admissibility of evidence.

Dated: April 10, 2015

THOMAS & LOCICERO PL

By: /s/ Gregg D. Thomas

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of April 2015, I caused a true and correct copy of the foregoing to be served via the Florida Courts' E-Filing Portal upon the following counsel of record:

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