

**EXHIBIT E**  
**TO PLAINTIFF'S MOTION FOR PROCEEDINGS SUPPLEMENTARY**

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
IN AND FOR PINELLAS COUNTY, FLORIDA

TERRY GENE BOLLEA professionally  
known as HULK HOGAN,

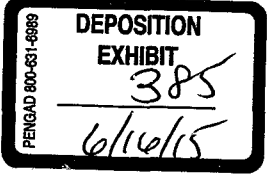
Plaintiff,

Case No.: 12012447-CI-011

vs.

HEATHER CLEM; GAWKER MEDIA,  
LLC aka GAWKER MEDIA; et al.,

Defendants.



**DEFENDANT NICK DENTON'S RESPONSES TO  
FINANCIAL WORTH INTERROGATORIES**

Pursuant to the Court's oral ruling at the hearing on May 29, 2015, Defendant Nick Denton hereby provides these responses to financial worth interrogatories.

**INTERROGATORIES AND RESPONSES**

**FINANCIAL WORTH INTERROGATORY NO. 1:** State whether the documents you are providing concerning your financial worth are authentic.

**RESPONSE:** Yes.

**FINANCIAL WORTH INTERROGATORY NO. 2:** Identify the amount of your financial worth.

**RESPONSE:** As explained below, because Mr. Denton's wealth is largely tied up in illiquid assets – specifically, in stock in a privately held company whose value has not been tested on the open market – it is very difficult to estimate his net worth. His best estimate is that his net worth is approximately \$26.3 million.

**FINANCIAL WORTH INTERROGATORY NO. 3:** Identify your material assets and liabilities.

**RESPONSE:** Mr. Denton responds that his material assets are as follows:

1. Condominium at 76 Crosby Street #2B, New York, NY 10012. An appraisal performed in October 2013 valued this property at \$4.1 million. The property carries a \$1.9 million mortgage, leaving a net worth of \$2.2 million.
2. A 38.51% ownership interest in Gawker Media Group, Inc. ("GMGI"). Because GMGI is privately held, and there is no regular market for shares of GMGI, the value of this ownership interest cannot be determined with any reasonable degree of certainty. In 2014, the Brenner Group performed a valuation of the company pursuant to Section 409A of the Internal Revenue Code. It concluded the market value of equity was \$61,571,941, making Denton's share theoretically worth \$23,711,354. However, these shares are highly illiquid, and there is no market-tested valuation that confirms whether the company, or Denton's share of the company, would be worth that much if sold, particularly in the absence of Denton's leadership.
3. 5,000 shares of Vox Media, Inc. ("Vox"). Because Vox is privately held, Denton does not have information on the total shares outstanding or other relevant information. Thus, the value of these shares, which were purchased more than a decade ago in a predecessor company, cannot be determined with any reasonable degree of certainty.
4. Checking and savings accounts holding approximately \$326,000.
5. Retirement account holding approximately \$108,000.
6. Miscellaneous personal items, including the furnishings of Denton's home, which Denton estimates are worth approximately \$20,000.

Denton's only material liability is the \$1.9 million mortgage on his condominium in New York City.

**FINANCIAL WORTH INTERROGATORY NO. 4:** State whether you (a) maintain the right to bring any action against another person or entity to recover a debt and the amount thereof, and/or (b) are currently involved in such an action.

**RESPONSE:** No.

Dated: June 4, 2015

THOMAS & LOCICERO PL

By: /s/ Gregg D. Thomas

Gregg D. Thomas

Florida Bar No.: 223913

Rachel E. Fugate

Florida Bar No.: 0144029

601 South Boulevard

P.O. Box 2602 (33601)

Tampa, FL 33606

Telephone: (813) 984-3060

Facsimile: (813) 984-3070

[gthomas@tlolawfirm.com](mailto:gthomas@tlolawfirm.com)

[rfugate@tlolawfirm.com](mailto:rfugate@tlolawfirm.com)

Seth D. Berlin

Pro Hac Vice Number: 103440

Michael Sullivan

Pro Hac Vice Number: 53347

Michael Berry

Pro Hac Vice Number: 108191

Alia L. Smith

Pro Hac Vice Number: 104249

Paul J. Safier

Pro Hac Vice Number: 103437

LEVINE SULLIVAN KOCH & SCHULZ, LLP

1899 L Street, NW, Suite 200

Washington, DC 20036

Telephone: (202) 508-1122

Facsimile: (202) 861-9888

[sberlin@lskslaw.com](mailto:sberlin@lskslaw.com)

[mberry@lskslaw.com](mailto:mberry@lskslaw.com)

[msullivan@lskslaw.com](mailto:msullivan@lskslaw.com)


[asmith@lskslaw.com](mailto:asmith@lskslaw.com)

[psafier@lskslaw.com](mailto:psafier@lskslaw.com)

*Counsel for Defendant Nick Denton*

VERIFICATION


I, Nick Denton, have read the foregoing and verify that the information set forth therein is true and correct to the best of my knowledge, information, and belief.


  
\_\_\_\_\_  
Nick Denton

STATE OF NEW YORK

COUNTY OF NEW YORK

The foregoing Verification of Nick Denton was SWORN TO AND SUBSCRIBED before me this 3<sup>rd</sup> day of June 2015.

  
\_\_\_\_\_  
Notary Public, State of New York

  
\_\_\_\_\_  
(Print, type, or stamp Commissioned name of Notary Public)

KAVITHA REDDY  
NOTARY PUBLIC STATE OF NEW YORK  
NEW YORK COUNTY  
LIC. #02REB1546  
COMM. EXP. \_\_\_\_\_

KAVITHA REDDY  
NOTARY PUBLIC STATE OF NEW YORK  
NEW YORK COUNTY  
LIC. #02REB154611  
COMM. EXP. 10/23/18

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 4th day of June 2014, I caused a true and correct copy of the foregoing to be served by email upon the following counsel of record:

Kenneth G. Turkel, Esq.  
[kturkel@BajoCuva.com](mailto:kturkel@BajoCuva.com)  
Shane B. Vogt, Esq.  
[shane.vogt@BajoCuva.com](mailto:shane.vogt@BajoCuva.com)  
Bajo Cuva Cohen & Turkel, P.A.  
100 N. Tampa Street, Suite 1900  
Tampa, FL 33602  
Tel: (813) 443-2199  
Fax: (813) 443-2193

David Houston, Esq.  
Law Office of David Houston  
[dhouston@houstonatlaw.com](mailto:dhouston@houstonatlaw.com)  
432 Court Street  
Reno, NV 89501  
Tel: (775) 786-4188

Charles J. Harder, Esq.  
[charder@HMAfirm.com](mailto:charder@HMAfirm.com)  
Douglas E. Mirell, Esq.  
[dmirell@HMAfirm.com](mailto:dmirell@HMAfirm.com)  
Sarah Luppen, Esq.  
[sluppen@HMAfirm.com](mailto:sluppen@HMAfirm.com)  
Harder Mirell & Abrams LLP  
1925 Century Park East, Suite 800  
Los Angeles, CA 90067  
Tel: (424) 203-1600  
Fax: (424) 203-1601

*Attorneys for Plaintiff*

Barry A. Cohen, Esq.  
[bcohen@tampalawfirm.com](mailto:bcohen@tampalawfirm.com)  
Michael W. Gaines  
[mgaines@tampalawfirm.com](mailto:mgaines@tampalawfirm.com)  
Barry A. Cohen Law Group  
201 East Kennedy Boulevard, Suite 1950  
Tampa, FL 33602  
Tel: (813) 225-1655  
Fax: (813) 225-1921

*Attorneys for Defendant Heather Clem*

/s/ Gregg D. Thomas  
Attorney