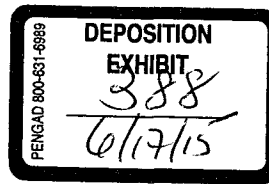


**EXHIBIT B**

**to Bollea's Renewed Motion for Sanctions and for  
Order to Show Cause Against Daulerio**



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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 A.J. DAULERIO'S RESPONSES TO  
FINANCIAL WORTH INTERROGATORIES**

Pursuant to the Court's oral ruling at the hearing on May 29, 2015, Defendant A.J.

Daulerio 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:** Mr. Daulerio's net worth is either zero or negative because his concrete liabilities exceed his concrete assets. In addition, as set forth below, Mr. Daulerio also owns shares in a privately-held start-up web publishing company RGFree, Inc. This company has not been subject to valuation through sale, offer to purchase or other means, and Mr. Daulerio is therefore unable to identify the amount of his financial worth; however, to date the company has generated zero revenue and is therefore not a material asset at this time.

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

**RESPONSE:** Mr. Daulerio's material assets are as follows:

1. A 44.7% ownership interest in RGFree, Inc. ("RGFree"). Because RGFree is a privately-held start-up company, and there is no regular market for its shares, the value of this ownership interest cannot be determined with any reasonable degree of certainty. No valuation has been performed on the company. Based on the fact that RGFree has not earned any revenue to date, it is not material to Mr. Daulerio's net worth at this time.

2. 5,900 shares in Gawker Media Group, Inc. ("GMGI"). Because GMGI is a privately-held company, and there is no regular market for its shares, the value of Mr. Daulerio's interest in those shares cannot be determined with any degree of certainty. Based on the valuation of GMGI by an independent third party, those shares are valued at \$3,107.46.

3. Checking and savings accounts holding \$2,020.

Mr. Daulerio's material liabilities are:

1. Debt in the amount of \$25,873.16.

2. Housing payments. For the period August 2014 – August 2015, Mr. Daulerio had the obligation to pay and has paid approximately \$52,000 in housing costs.

**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.

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Dated: June 4, 2015

THOMAS & LOCICERO PL

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*Counsel for Defendant A.J. Daulerio*

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**VERIFICATION TO COME**

**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:

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