

EXHIBIT C

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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,

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.

**PLAINTIFF TERRY GENE BOLLEA'S RESPONSES TO GAWKER MEDIA, LLC'S
REQUEST FOR PRODUCTION OF DOCUMENTS**

Plaintiff TERRY GENE BOLLEA (herein "Responding Party") hereby responds to
Request for Production of Documents (Set One) propounded by defendant GAWKER MEDIA,
LLC (herein "Propounding Party") as follows:

PRELIMINARY STATEMENT

Responding Party responds to the Requests for Production subject to, without waiver of,
and expressly preserving: (a) any objections as to the competency, relevance, materiality,
privilege or admissibility of any of the responses or any of the documents identified in any
response hereto; and (b) the right at any time to revise, correct, supplement or clarify any of the
responses herein.

These responses are based upon a diligent investigation undertaken by Responding Party
and his counsel since the service of these Requests. These responses reflect only Responding

RESPONSE TO REQUEST 32:

Responding Party objects to this Request to the extent that it seeks documents protected from disclosure by the attorney-client privilege and/or attorney work product doctrine.

Responding Party objects to this Request on the ground that the Request is overbroad and burdensome. Responding Party objects to this Request on the ground that it is so broad on its face that it requires production of irrelevant documents. Responding Party further objects to this Request to the extent that it seeks documents that are not relevant to the claims, defenses, or subject matter of the instant action, nor reasonably calculated to lead to the discovery of admissible evidence. Responding Party objects to this Request to the extent that it seeks to invade Responding Party's privacy and the privacy of third parties.

REQUEST 33:

Any and all documents concerning your purported acquisition of the copyright to the Video.

RESPONSE TO REQUEST 33:

Responding Party objects to this Request to the extent that it seeks documents protected from disclosure by the attorney-client privilege and/or attorney work product doctrine.

Responding Party objects to this Request on the ground that the Request is overbroad and burdensome. Responding Party objects to this Request to the extent it seeks confidential settlement communications.

Without waiver of the foregoing, Responding Party responds as follows: Responding Party will endeavor to collect and produce the documents through which Todd Clem transferred his copyright interest in the Video to Responding Party, within a reasonable period of time.

REQUEST 34:

Any and all documents concerning the settlement of your claims against Todd Alan Clem, including any documents containing communications between you or your agents or attorneys and the agents or attorneys of Todd Alan Clem.

RESPONSE TO REQUEST 34:

Responding Party objects to this Request to the extent that it seeks documents protected from disclosure by the attorney-client privilege and/or attorney work product doctrine.

Responding Party objects to this Request on the ground that the Request is overbroad and burdensome. Responding Party objects to this Request to the extent it seeks confidential settlement communications. Without waiver of the foregoing, Responding Party responds as follows: Responding Party will endeavor to collect and produce the documents which comprise the settlement agreement between Responding Party and Todd Clem.

REQUEST 35:

Any and all documents published about you in any newspaper, magazine, book, or other hard-copy or electronically published publication during the Relevant Time Period.

RESPONSE TO REQUEST 35:

Responding Party objects to this Request to the extent that it seeks documents protected from disclosure by the attorney-client privilege and/or attorney work product doctrine.

Responding Party objects to this Request on the ground that the requested documents are not identified with reasonable particularity. Responding Party objects to this Request on the ground that the Request is overbroad and burdensome. Responding Party objects to this Request on the ground that it is so broad on its face that it requires production of irrelevant documents and

that you intend to or may rely upon during trial of this action, either as evidence or for purposes of impeachment, or for refreshing the recollection of a witness.

RESPONSE TO REQUEST 50:

Responding Party objects to this Request to the extent that it seeks documents protected from disclosure by the attorney-client privilege and/or attorney work product doctrine.

Responding Party objects to this Request on the ground that the requested documents are not identified with reasonable particularity. Responding Party further objects to this Request on the ground that it requires Responding Party to produce documents that would not be created until trial.

DATED: August 21, 2013

Respectfully submitted,



Charles J. Harder, Esq.
PHV No. 102333
HARDER MIRELL & ABRAMS LLP
1801 Avenue of the Stars, Suite 1120
Los Angeles, CA 90067
Tel: (424) 203-1600
Fax: (424) 203-1601
Email: charder@hmafirm.com

-and-

Kenneth G. Turkel, Esq.
Florida Bar No. 867233
Christina K. Ramirez, Esq.
Florida Bar No. 954497
BAJO CUVA COHEN & TURKEL, P.A.
100 North Tampa Street, Suite 1900
Tampa, Florida 33602
Tel: (813) 443-2199

Fax: (813) 443-2193

Email: kturkel@bajocuva.com

Email: cramirez@bajocuva.com

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via U.S. First Class Mail this 21 day of August, 2013 to the following:

Barry A. Cohen, Esquire
Michael W. Gaines, Esquire
The Cohen Law Group
201 East Kennedy Blvd.
Suite 1000
Tampa, FL 33602
bcohen@tampalawfirm.com
mgaines@tampalawfirm.com
Counsel for Heather Clem

Gregg D. Thomas, Esquire
Rachel E. Fugate, Esquire
Thomas & LoCicero PL
601 S. Boulevard
Tampa, Florida 33606
gthomas@tlolawfirm.com
rfugate@tlolawfirm.com
Counsel for Defendant Gawker

Seth D. Berlin, Esquire
Paul J. Safier, Esquire
Levine Sullivan Koch & Schulz, LLP
1899 L. Street, NW
Suite 200
Washington, DC 20036
sberlin@lskslaw.com
psafier@lskslaw.com
Pro Hac Vice Counsel for
Defendant Gawker

David R. Houston, Esquire
Law Office of David R. Houston
432 Court Street
Reno, NV 89501



Attorney