

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 DENNERT, and  
BLOGWIRE HUNGARY SZELLEMI  
ALKOTAST HASZNOSITO KFT aka  
GAWKER MEDIA,

Defendants.

\_\_\_\_\_ /

**PLAINTIFF'S SECOND SET OF INTERROGATORIES  
TO DEFENDANT GAWKER MEDIA, LLC**

Plaintiff Terry Gene Bollea, professionally known as Hulk Hogan, by counsel and pursuant to Florida Rule of Civil Procedure 1.340, requests that Defendant Gawker Media LLC answer the interrogatories set forth below, numbered 11 through 14, within 30 days from the certificate of service.

**DEFINITIONS AND INSTRUCTIONS**

As used in these interrogatories:

(a) "YOU" or "YOUR" or "GAWKER" means Defendant Gawker Media LLC and its parent company, subsidiaries, affiliated companies, including but not limited to Gawker Media Group, Inc., Gawker Entertainment, LLC, Gawker Technology, LLC, Gawker Sales, LLC, and/or Blogwire Hungary Szellemi Alkotast Hasznosito KFT, and all of their members,



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shareholders, managers, executives, officers, board members, employees, agents, representatives, attorneys, and all other PERSONS acting on any of their respective behalves.

(b) “PLAINTIFF” means Plaintiff Terry Gene Bollea (professionally known as Hulk Hogan), as well as any agents, attorneys and consultants therefor, and all other PERSONS acting or purporting to act on his behalf.

(c) “GAWKER.COM” means the website located at [www.gawker.com](http://www.gawker.com), as well as any agents, attorneys, and consultants therefor, and all other PERSONS acting or purporting to act on its behalf.

(d) “BLOGWIRE HUNGARY” means Defendant Blogwire Hungary Szellemi Alkotast Hasznosito KFT and its parent company, subsidiaries, affiliated companies, and all of their members, shareholders, managers, executives, officers, board members, employees, agents, representatives, attorneys, and all other PERSONS acting on any of their respective behalves.

(e) “COMMUNICATION” means any correspondence, contact, discussion, or exchange between any two or more PERSONS. Without limiting the foregoing, “COMMUNICATION” includes all DOCUMENTS, telephone conversations or face-to-face conversations, electronic messages, meetings and conferences.

(f) “DOCUMENT” means the original and any copy (except for identical copies) of any document or thing subject to production under the Florida Rules of Civil Procedure that is in YOUR actual or constructive possession, custody, or CONTROL, including any written, printed, recorded, typed, mechanical, electronic, computer stored or graphic matter of any kind however produced or reproduced and all drafts thereof. Any copy containing thereon or attached thereto any alterations, notes, comments, or other material not included in any original or other copy

shall not be deemed an identical copy but shall be deemed a separate document within the foregoing definition.

(g) "CONTROL" shall mean the right to secure, or a reasonable likelihood of securing, the DOCUMENT or a copy thereof from another PERSON having actual physical possession thereof. If any DOCUMENT requested was, but is no longer in YOUR possession or subject to YOUR CONTROL as defined herein, YOU are instructed to state what disposition was made of it and the date or dates, or approximate date or dates, on which such disposition was made.

(h) "IDENTIFY," when used in reference to an individual, means to state his or her full name, present address, if known, telephone number, e-mail address, and present employment position and business affiliation. When used in reference to an ENTITY, "IDENTIFY" means to state whether that ENTITY is a corporation, partnership, limited liability company, limited liability partnership, or other organization, and the name, present and last known address of its principal place of business. "IDENTIFY," when used in reference to a DOCUMENT, means to state the date, the author, the addressee, type of document, and any other means of identifying with sufficient particularity to meet the requirements for its inclusion in a request for production of documents pursuant to the Florida Rules of Civil Procedure.

(i) "RELATE TO" means concerning, respecting, summarizing, digesting, embodying, reflecting, establishing, tending to establish, delegating from, tending not to establish, evidencing, not evidencing, comprising, connected with, commenting on, responding to, disagreeing with, showing, describing, analyzing, representing, constituting or including, or having any connection with.

(j) "STATE ALL FACTS" means: Please set out every aspect of every fact,

circumstance, omission, or course of conduct known to YOU relating in any way to the matter inquired about, including without limitation, the date(s), time(s), and place(s), and/or the geographical location(s) thereof; the identity(ies) of each PERSON thereat, connected therewith, or who has knowledge thereof, and the identity of all DOCUMENTS relating thereto; if anything was said by any PERSON, the identity of each such PERSON and each such oral statement; and if the oral statement, in whole or in part, was contained, reported, summarized, or referred to in any DOCUMENTS, the identity of each such DOCUMENT.

(k) "PERSON" means any individual, firm, partnership, association, proprietorship, joint venture, corporation, governmental agency, or other organization or legal or business entity, as well as any agents, attorneys and consultants therefor, and all other PERSONS acting or purporting to act on its behalf.

(l) "ENTITY" means any firm, partnership, association, proprietorship, joint venture, corporation, governmental agency, or other organization or legal or business entity, as well as any agents, attorneys and consultants therefor, and all other PERSONS acting or purporting to act on its behalf.

(m) "All" includes the word "any" and "any" includes the word "all."

(n) "Each" includes the word "every" and "every" includes the word "each."

(o) To the extent an interrogatory calls for information which cannot be now precisely and completely furnished, such information as can be furnished should be included in the answer, together with a statement that further information cannot be furnished, and a statement as to the reasons therefor. If the information which cannot now be furnished is believed to be available to another PERSON, IDENTIFY such other PERSON and the reason for believing such PERSON has the described information.

(p) In the event any interrogatory herein calls for information or for the identification of a DOCUMENT which you deem to be privileged, in whole or in part, the information should be given or the DOCUMENT identified to the fullest extent possible consistent with such claim of privilege, and you should state the nature of the privilege claimed and specify the grounds relied upon for the claim of privilege.

(q) A separate answer shall be furnished for each interrogatory.

### **INTERROGATORIES**

(If answering for another PERSON or ENTITY, answer with respect to that PERSON or ENTITY, unless otherwise stated.)

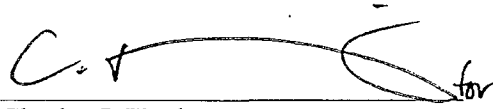
11. STATE ALL FACTS regarding BLOGWIRE HUNGARY's role in the creation, editing, and/or posting of content on GAWKER.COM.

12. Describe the role and line of business of GAWKER and each company affiliated in any way with GAWKER throughout the period between January 1, 2010 and the present.

13. IDENTIFY each entity and/or individual which directly or indirectly receives money or other compensation that is generated by or originated by GAWKER.COM or any content thereon.

14. IDENTIFY any vendor engaged to conduct, assist in, or otherwise participate in any electronic discovery, computer searches, or database management with respect to DOCUMENTS that are relevant to this action.

DATED: June 27, 2013

A handwritten signature in black ink, appearing to read 'C. J. Harder', with a horizontal line drawn underneath it.

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Counsel for Plaintiff

**VERIFICATION**

STATE OF FLORIDA  
COUNTY OF \_\_\_\_\_

BEFORE ME, the undersigned authority, personally appeared \_\_\_\_\_,  
known to me to be said person or who produced \_\_\_\_\_ as  
identification, who being first duly sworn, deposes and says that the above Answers to  
Interrogatories herein are true and correct to the best of his/her knowledge and belief.

SWORN TO AND SUBSCRIBED before me this \_\_\_\_ day of \_\_\_\_\_, 2013.

\_\_\_\_\_  
NOTARY PUBLIC

\_\_\_\_\_  
Printed Name of Notary Public

My Commission Expires:  
\_\_\_\_\_

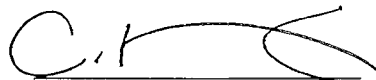
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via e-mail this 27<sup>th</sup> day of June, 2013 to the following:

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