

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.

\_\_\_\_\_ /

**OBJECTIONS OF DEFENDANT GAWKER MEDIA GROUP, INC.,  
SPECIALLY APPEARING, TO PLAINTIFF’S FIRST REQUEST  
FOR PRODUCTION OF DOCUMENTS**

Pursuant to Florida Rule of Civil Procedure 1.350, Defendant Gawker Media Group, Inc. (“GMGI”) specially appears, and without intending to waive its challenge to this Court’s exercise of jurisdiction over it, hereby provides these objections to Plaintiff’s First Request for Production of Documents dated November 7, 2013.

**OBJECTIONS**

**REQUEST NO. 1:** All DOCUMENTS that RELATE TO the formation of each of the GAWKER companies.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request as overly broad and unduly burdensome because it seeks “all documents that relate to” the subject matter of the

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Request with respect to at least three separate companies, and GMGI does not necessarily possess documents relating to other companies. GMGI further objects to this Request to the extent that it seeks the production of documents protected from discovery by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine.

**REQUEST NO. 2:** All DOCUMENTS that RELATE TO the identity of the owners of each of the GAWKER companies.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request as overly broad and unduly burdensome because it seeks “all documents that relate to” the subject matter of the Request for an unlimited period of time with respect to at least three separate companies, and GMGI does not necessarily possess documents relating to other companies. GMGI further objects to this Request to the extent that it seeks the production of documents protected from discovery by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine. Finally, GMGI objects to this Request on the grounds that it is substantially similar to Request No. 30 directed to Gawker Media, LLC, which the Court found to be improper at the hearing on November 25, 2013.

**REQUEST NO. 3:** DOCUMENTS sufficient to establish the state of incorporation and principal place of business of each of the GAWKER companies.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly

burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request as overly broad and unduly burdensome because it seeks documents that relate to the subject matter of the Request with respect to at least three separate companies, and GMGI does not necessarily possess documents relating to other companies. GMGI further objects to this Request to the extent that it seeks the production of documents protected from discovery by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine. GMGI further objects to this Request on the grounds that information concerning the places of incorporation of the Gawker companies has already been produced by Gawker Media, LLC.

**REQUEST NO. 4:** All DOCUMENTS that contain or constitute organization charts for GAWKER.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request as overly broad and unduly burdensome because it seeks documents with respect to at least three separate companies, and GMGI does not necessarily possess documents relating to other companies. GMGI further objects to this Request to the extent that it seeks the production of documents protected from discovery by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine. GMGI further objects to this Request on the grounds that information

concerning the organizational structure of the Gawker companies has already been produced by Gawker Media, LLC.

**REQUEST NO. 5:** All DOCUMENTS that RELATE TO business and/or financial transactions of any kind between YOU and any other GAWKER entity, manager, officer, director, executive, or shareholder.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013 including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request as overly broad and unduly burdensome because it seeks “all documents” that relate to the subject matter of the Request (including those related to business or financial transactions “*of any kind*” for an unlimited period of time) (emphasis added). GMGI further objects to this Request to the extent that it seeks the production of documents protected from discovery by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine. Finally, GMGI objects to this Request on the grounds that it is substantially similar to Request Nos. 91-92 directed to Gawker Media, LLC, which the Court found to be improper at the hearing on November 25, 2013.

**REQUEST NO. 6:** DOCUMENTS sufficient to show the line of business and/or types of business activities engaged in by YOU.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the

discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request on the grounds that information concerning its operations (or lack thereof) has already been provided to plaintiff.

**REQUEST NO. 7:** All DOCUMENTS that RELATE TO COMMUNICATIONS between YOU and any other GAWKER entity, manager, officer, director, executive, or shareholder.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request as overly broad and unduly burdensome because it seeks “all documents that relate to” the subject matter of the Request for an unlimited period of time. GMGI further objects to this Request to the extent that it seeks the production of documents protected from discovery by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine.

**REQUEST NO. 8:** All DOCUMENTS that RELATE TO shareholder distributions made by YOU.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request as overly broad and unduly burdensome because it seeks “all documents that relate to” the subject matter of the

Request for an unlimited period of time. GMGI further objects to this Request to the extent that it seeks the production of documents protected from discovery by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine.

**REQUEST NO. 9:** DOCUMENTS sufficient to IDENTIFY YOUR shareholders, and the percentage share of GMGI owned by each shareholder.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request on the grounds that it is substantially similar to Request No. 30 directed to Gawker Media, LLC, which the Court found to be improper at the hearing on November 25, 2013.

**REQUEST NO. 10:** DOCUMENTS sufficient to IDENTIFY the shareholders or owners of Gawker Media, LLC, and the percentage share of Gawker Media, LLC owned by each shareholder or owner.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request on the grounds that it is duplicative of numerous prior discovery requests and deposition questions, in which Gawker Media, LLC confirmed that Gawker Media, LLC is a wholly-owned subsidiary of GMGI.

**REQUEST NO. 11:** DOCUMENTS sufficient to IDENTIFY the shareholders or owners of Kinja KFT, and the percentage share of Kinja KFT owned by each shareholder or owner.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request on the grounds that it is duplicative of numerous prior discovery requests and deposition questions, in which Gawker Media, LLC confirmed that Kinja, KFT is a wholly-owned subsidiary of GMGI.

**REQUEST NO. 12:** All DOCUMENTS that RELATE TO COMMUNICATIONS between YOU and anyone in the United States.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request as overly broad and unduly burdensome, including because it seeks “all documents that relate to” the subject matter of the Request for an unlimited period of time for the entire United States. GMGI further objects to this Request to the extent that it seeks the production of documents protected from discovery by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine.

**REQUEST NO. 13:** All DOCUMENTS that RELATE TO any business transaction between YOU and anyone in the United States.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request as overly broad and unduly burdensome, including because it seeks “all documents that relate to” the subject matter of the Request for an unlimited period of time for the entire United States. GMGI further objects to this Request to the extent that it seeks the production of documents protected from discovery by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine.

**REQUEST NO. 14:** All DOCUMENTS that RELATE TO any movements of money between YOU and anyone in the United States.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request as overly broad and unduly burdensome, including because it seeks “all documents that relate to” the subject matter of the Request for an unlimited period of time for the entire United States. GMGI further objects to this Request to the extent that it seeks the production of documents protected from discovery by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine.

**REQUEST NO. 15:** All DOCUMENTS that show or identify a United States address and/or telephone number for YOU, including without limitation 210 Elizabeth Street, Fourth Floor, New York, NY 10012.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request as overly broad and unduly burdensome, including because it seeks “all documents” that relate to the subject matter of the Request for an unlimited period of time for the entire United States. GMGI further objects to this Request to the extent that it seeks the production of documents protected from discovery by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine.

**REQUEST NO. 16:** All DOCUMENTS constituting or containing YOUR official minutes of meetings, corporate resolutions, board of directors resolutions, and/or shareholder resolutions.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request as overly broad and unduly burdensome because it seeks “all documents that relate to” the subject matter of the Request for an unlimited period of time. GMGI further objects to this Request to the extent that

it seeks the production of documents protected from discovery by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine.

**REQUEST NO. 17:** All DOCUMENTS that RELATE TO the purpose of the formation of GMGI.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request as overly broad and unduly burdensome, including because it seeks “all documents that relate to” the subject matter of the Request for an unlimited period of time. GMGI further objects to this Request to the extent that it seeks the production of documents protected from discovery by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine.

**REQUEST NO. 18:** All DOCUMENTS that RELATE TO any contacts between GMGI and the United States.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request as overly broad and unduly burdensome, including because it seeks “all documents that relate to” the subject matter of the Request for an unlimited period of time for the entire United States. GMGI further objects to this Request to the extent that it seeks the production of documents protected from discovery

by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine.

**REQUEST NO. 19:** All DOCUMENTS that RELATE TO any contacts between GMGI and the State of Florida.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it (including for example that substantial prior discovery in this action confirms that GMGI has no operations, no employees and no contacts with Florida).

GMGI further objects to this Request as overly broad and unduly burdensome because it seeks “all documents that relate to” the subject matter of the Request for an unlimited period of time.

GMGI further objects to this Request to the extent that it seeks the production of documents protected from discovery by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine.

**REQUEST NO. 20:** All DOCUMENTS that mention GMGI and the LAWSUIT.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request to the extent that it seeks the production of documents protected from discovery by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine.

**REQUEST NO. 21:** All DOCUMENTS that mention GMGI and the SEX TAPE.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request to the extent that it seeks the production of documents protected from discovery by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine.

**REQUEST NO. 22:** DOCUMENTS sufficient to establish the location, bank, and balance of each bank account in YOUR name.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request on the grounds that it seeks the type of detailed financial information which the Court found to be improper and beyond the scope of permissible discovery at the hearing on November 25, 2013.

**REQUEST NO. 23:** DOCUMENTS sufficient to establish the location, financial institution, and balance of each account holding money or assets belonging to GMGI.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the

Court lacks jurisdiction over it. GMGI further objects to this Request on the grounds that it seeks the type of detailed financial information which the Court found to be improper and beyond the scope of permissible discovery at the hearing on November 25, 2013.

**REQUEST NO. 24:** All DOCUMENTS that contain or constitute statements of account for any bank account or account holding money or assets belonging to GMGI.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request as overly broad and unduly burdensome because it seeks “all documents” that relate to the subject matter of the Request for an unlimited period of time. GMGI further objects to this Request on the grounds that it seeks the type of detailed financial information which the Court found to be improper and beyond the scope of permissible discovery at the hearing on November 25, 2013.

**REQUEST NO. 25:** DOCUMENTS establishing the capitalization and equity of each direct or indirect subsidiary of GMGI.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request as overly broad and unduly burdensome because it seeks documents that relate to the subject matter of the Request for an unlimited period of time with respect to at least three separate companies, and GMGI does

not necessarily possess documents relating to other companies. GMGI further objects to this Request on the grounds that it is duplicative of numerous prior discovery requests and deposition questions concerning the capitalization and financial condition of Gawker Media, LLC, for which three-and-a-half years' worth of detailed financial information was previously produced.

**REQUEST NO. 26:** All DOCUMENTS that contain or constitute reports made to any government agency regarding the financial performance or condition of any GAWKER entity.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request on the grounds that the term "reports made to any government agency regarding the financial performance or condition" is vague and ambiguous. GMGI further objects to this Request as overly broad and unduly burdensome because it seeks "all documents" that relate to the subject matter of the Request for an unlimited period of time with respect to at least three separate companies, and GMGI does not necessarily possess documents relating to other companies. GMGI further objects to this Request on the grounds that it is duplicative of numerous prior discovery requests and deposition questions concerning the financial condition of Gawker Media, LLC, for which three-and-a-half years' worth of detailed financial information as previously produced.

**REQUEST NO. 27:** All DOCUMENTS that contain or constitute reports made to any government agency regarding any financial transaction between GAWKER entities.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly

burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request on the grounds that the term “reports made to any government agency regarding any financial transaction” is vague and ambiguous. GMGI further objects to this Request as overly broad and unduly burdensome because it seeks “all documents” that relate to the subject matter of the Request for an unlimited period of time with respect to at least three separate companies, and GMGI does not necessarily possess documents relating to other companies. GMGI further objects to this Request on the grounds that it is duplicative of numerous prior discovery requests and deposition questions concerning (a) the financial condition of Gawker Media, LLC, for which three-and-a-half years’ worth of detailed financial information as previously produced, and (b) transactions between Gawker Media, LLC, GMGI, and Kinja, KFT, which confirmed, *inter alia*, that Gawker Media, LLC has made no distributions to GMGI.

**REQUEST NO. 28:** All DOCUMENTS that contain or constitute financial statements for any GAWKER entity.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request as overly broad and unduly burdensome because it seeks “all documents” concerning the subject matter of the Request for an unlimited period of time with respect to at least three separate companies, and GMGI does not necessarily possess documents relating to other companies. Finally, GMGI

objects to this Request on the grounds that it is substantially similar to Request Nos. 92-93 and 101-104 directed to Gawker Media, LLC, which the Court found to be improper at the hearing on November 25, 2013.

**REQUEST NO. 29:** DOCUMENTS sufficient to IDENTIFY every employee or independent contractor of GMGI.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request as overly broad and unduly burdensome because it seeks documents for an unlimited period of time. GMGI further objects to this Request on the grounds that it is duplicative of numerous prior discovery requests and deposition questions concerning this subject.

**REQUEST NO. 30:** All DOCUMENTS that RELATE TO any lawsuit (other than the LAWSUIT) filed against YOU in any court within the United States.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request as overly broad and unduly burdensome, including because it seeks documents that are not relevant in any way to this action. GMGI further objects to this Request to the extent that it seeks the production of

documents protected from discovery by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine.

**REQUEST NO. 31:** All DOCUMENTS that RELATE TO any lawsuit filed by YOU in any court within the United States.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request as overly broad and unduly burdensome, including because it seeks documents that are not relevant in any way to this action. GMGI further objects to this Request to the extent that it seeks the production of documents protected from discovery by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine.

**REQUEST NO. 32:** All DOCUMENTS that RELATE TO any COMMUNICATIONS between GMGI and any government agency within the United States.

**OBJECTIONS:** GMGI objects to this Request for the reasons stated in its motion for protective order filed December 12, 2013, including without limitation that the Request is unduly burdensome and seeks sensitive information that is neither relevant nor likely to lead to the discovery of admissible evidence, given that GMGI is not a proper party to this lawsuit and the Court lacks jurisdiction over it. GMGI further objects to this Request as overly broad and unduly burdensome, including because it seeks documents that are not relevant in any way to this action. GMGI further objects to this Request to the extent that it seeks the production of

documents protected from discovery by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine.

Dated: December 12, 2013

THOMAS & LOCICERO PL

By: /s/ Gregg D. Thomas

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*Counsel for specially appearing  
Defendant Gawker Media Group, Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 12th day of December, 2013, I caused a true and correct copy of the foregoing to be served electronically upon the following counsel of record at their respective email addresses via the Florida Courts E-Filing Portal:

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