

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
IN AND FOR PINELLAS COUNTY, FLORIDA  
CASE NUMBER: 12012447-CI-011

TERRY GENE BOLLEA, professionally  
known as HULK HOGAN

Plaintiff,

vs.

HEATHER CLEM; GAWKER MEDIA,  
LLC, a/k/a GAWKER MEDIA; et al.,

Defendants.

\_\_\_\_\_/

**OBJECTIONS AND RESPONSES TO GAWKER MEDIA, LLC's**  
**SUBPOENA DUCES TECUM WITHOUT DEPOSITION**  
**DIRECTED TO THOMAS J. BEAN**

1. Objection; overbroad, vague, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. Further, said request invades the calls for privileged information and documents protected by the work-product privilege, the attorney-client privilege, and seeks to impermissibly violate the protection and confidentiality afforded settlement negotiations under Florida Law. Without waiving any of the foregoing objections, protections, or claims to privilege and confidentiality, Mr. Bean does not possess any responsive documents beyond a copy of the confidential settlement agreement previously listed on Mr. Clem's Privilege Log.
2. Objection; overbroad, vague, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. Further, said request invades the calls for privileged information and documents protected by the work-product privilege, the attorney-client privilege, and seeks to impermissibly violate the protection and confidentiality afforded settlement negotiations under Florida Law. Without waiving any of the foregoing

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objections, protections, or claims to privilege and confidentiality, Mr. Bean does not possess any responsive documents beyond a copy of the confidential settlement agreement previously listed on Mr. Clem's Privilege Log.

3. Objection; overbroad, vague, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. Further, said request invades the calls for privileged information and documents protected by the work-product privilege, the attorney-client privilege, and seeks to impermissibly violate the protection and confidentiality afforded settlement negotiations under Florida Law. Without waiving any of the foregoing objections, protections, or claims to privilege and confidentiality, Mr. Bean does not possess any responsive documents.
4. Objection; overbroad, vague, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. Further, said request invades the calls for privileged information and documents protected by the work-product privilege, the attorney-client privilege, and seeks to impermissibly violate the protection and confidentiality afforded settlement negotiations under Florida Law. Without waiving any of the foregoing objections, protections, or claims to privilege and confidentiality, Mr. Bean does not possess any responsive documents.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 9th day of January, 2014, a true and correct copy of the foregoing was furnished by electronic mail to:

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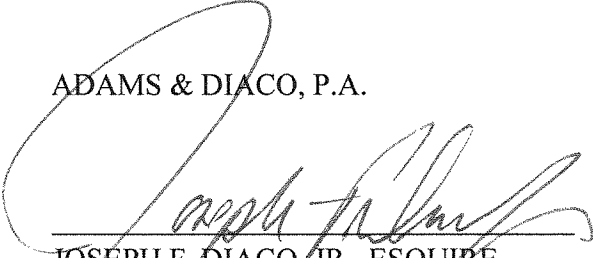
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