

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.

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**PLAINTIFF TERRY GENE BOLLEA'S RESPONSE TO SECOND SET OF  
INTERROGATORIES PROPOUNDED BY AJ DAULERIO**

**PROPOUNDING PARTY: Defendant AJ DAULERIO**

**RESPONDING PARTY: Plaintiff TERRY GENE BOLLEA**

**SET NO.: TWO**

Plaintiff TERRY GENE BOLLEA (herein "Responding Party") hereby serves his  
responses to the second set of interrogatories propounded by defendant AJ DAULERIO (herein  
"Propounding Party") as follows:

**PRELIMINARY STATEMENT**

Responding Party responds to the Interrogatories subject to, without intending to waive,  
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 its counsel since the service of these Interrogatories. These responses reflect only Responding Party's current understanding, belief and knowledge regarding the matters about which inquiry was made. Responding Party has not yet had sufficient opportunity to depose or interview all persons who may have knowledge of relevant facts, or to discover or otherwise obtain and review all documents which may have some bearing on this case.

Consequently, there may exist further information, documents and persons with knowledge relevant to these Interrogatories of which Responding Party is not currently aware. As this action proceeds, Responding Party anticipates that further facts, witnesses and documents may be discovered or identified. Without in any way obligating it to do so, Responding Party reserves the right to offer further or different evidence or information at trial or at any pretrial proceeding. These responses are not in any way to be deemed an admission or representation that there are no further facts, documents or witnesses having knowledge relevant to the subject matter of these Interrogatories.

### **GENERAL OBJECTIONS**

1. The following Responses, and each of them, are based upon information and writings presently available to, and located by, Responding Party and its attorneys. Responding Party has not completed an investigation of the facts or discovery proceedings in this case and has not completed its preparation for trial. The following Responses, and each of them, are made without prejudice to Responding Party's right to produce evidence based on subsequently discovered facts or documents, and to offer such facts or documents in evidence at the time of trial. The fact that Responding Party has responded to an Interrogatory should not be taken as an admission that Responding Party accepts or admits the existence of any facts set forth or

assumed by such Interrogatory, or that such Response constitutes admissible evidence. The following Responses, and each of them, are made without prejudice to the rights of Responding Party to introduce evidence of any subsequently discovered facts or documents which Responding Party may later obtain, discover or recall.

2. The documents and information which could or would form the basis of responses to the instant Interrogatories, in whole or in part, are still in the process of being identified by Responding Party, and all such relevant documents and information have not yet been identified, examined or produced. In addition, the significance of documents and information which may now be in the possession of Responding Party may only become apparent upon further discovery and review of those documents and information in the context of other documents which have not yet been identified or obtained in the context of later testimony or discovery which may establish their relevance.

3. These Responses are made, and any and all documents are being produced, solely for the purposes of this litigation. Any documents supplied in response to the Requests are being supplied by Responding Party subject to all objections as to competence, relevance, materiality, propriety and admissibility, and to any and all other objections on any ground that would require the exclusion of any document or portion thereof, if such document were offered in evidence in Court, all of which objections and ground are expressly reserved and may be interposed at the time of trial.

4. Responding Party, accordingly, reserves the right to alter or modify any and all Responses set forth herein as additional facts may be ascertained, documents discovered, analyses made, witnesses identified, additional parties identified, legal research completed, and contentions made or expanded.

5. Responding Party objects generally to each and every Interrogatory to the extent it calls for information that is protected by the attorney-client privilege and/or the attorney work product doctrine.

6. Responding Party objects generally to each and every Interrogatory to the extent it requests any information concerning the content of conversations of any other party to this action or documents in the possession of any other party to this action, other than the Responding Party, in that such information is equally accessible to all parties.

7. Responding Party objects to producing any private and/or confidential business or proprietary information or trade secrets.

8. Responding Party objects to these Interrogatories, and each of them, to the extent they are not limited to the subject matter of this action and thus are irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

9. Responding Party objects to these Interrogatories, and each of them, to the extent they are unduly burdensome, oppressive, unreasonably cumulative, duplicative and overbroad.

10. Responding Party objects to these Interrogatories, and each of them, to the extent they seek information to which Propounding Party has equal access.

### **RESPONSES**

The Preliminary Statement and General Objections are incorporated into each response below, regardless of whether specifically mentioned. The specific objections set forth below are not a waiver, in whole or in part, of any of the foregoing General Objections. Subject to and without waiver of these objections, Responding Party responds below.

### **INTERROGATORY 9:**

Describe in detail every communication you or someone acting on your behalf had with any law

enforcement agency, or any employee thereof, concerning any recording of you having sexual relations with Heather Clem, including without limitation the date of the communication, the participants to the communication (or if a written communication the sender(s) and all recipients), the substance of the communication, and any response to the communication.

**RESPONSE TO INTERROGATORY 9:**

Responding Party objects to this Interrogatory to the extent that it seeks information protected from disclosure by the attorney-client privilege and/or attorney work product doctrine. Responding Party objects to this Interrogatory on the ground that it seeks information protected by the law enforcement investigatory privilege. Responding Party further objects to this Interrogatory on the grounds that it is not reasonably likely to lead to the discovery of admissible evidence. Responding Party objects to this Interrogatory as invasive of Responding Party's privacy and the privacy of Heather Clem. Responding Party further objects to this Interrogatory on the grounds of overbreadth.

**INTERROGATORY 10:**

For any cellular phone account (including without limitation any texting service) you had at any time during 2012 or any telephone landline you had at any time during 2012, identify the account, including without limitation the service provider, the phone number, the account number, and the person in whose name the account was held.

**RESPONSE TO INTERROGATORY 10:**

Responding Party objects to this Interrogatory to the extent that it seeks information protected from disclosure by the attorney-client privilege and/or attorney work product doctrine. Responding Party further objects to this Interrogatory on the grounds that it is not reasonably likely to lead to the discovery of admissible evidence. Responding Party objects to this

Interrogatory as invasive of Responding Party's privacy. Responding Party further objects to this Interrogatory on the grounds of overbreadth.

DATED: January 21, 2014

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Counsel for Plaintiff

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via E-Service mail this 21st day of January, 2014 to the following:

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