

EXHIBIT 4

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 OPPOSITION TO EXPEDITED MOTION TO
COMPEL COMPLIANCE WITH OCTOBER 29, 2013 DISCOVERY RULINGS**

I. INTRODUCTION

Gawker's motion to compel is unwarranted. First, Gawker has moved to compel compliance with a purported court order that (1) has not been entered, and (2) did not compel a further response from Mr. Bollea, and instead imposed a **limitation** on Gawker's discovery. Further, Mr. Bollea has provided all of the information that Gawker has asked for, including all of the documents within his possession, custody, and control that fall within Gawker's document demands, and all of the information requested in Gawker's interrogatories. Promptly following the meet and confer conference regarding the instant motion, Mr. Bollea provided three sentences of additional information in a supplemental response to Interrogatory No. 9, and also

objections of Mr. Bollea: Interrogatory No. 12. Tr. (10/29/13) at 92:19:93:2. Mr. Bollea timely served a supplemental response to Interrogatory No. 12, as ordered, and that Interrogatory is **not at issue in any of the pending discovery motions** filed by Gawker, including the two discovery motions filed in this action on February 12 and 13, 2014, or the New York State Court petition filed by Gawker against Mr. Bollea's publicist, filed on February 13, 2014.

To reiterate: at no point during the October 29, 2013 hearing did Judge Campbell state that Mr. Bollea was being compelled to serve a further response to **any** discovery, other than Interrogatory No. 12. Rather, Judge Campbell granted a protective order and sustained numerous objections asserted by Mr. Bollea, and overruled Mr. Bollea's objections to one interrogatory (No. 12) which Mr. Bollea had already fully answered and is not the subject of any pending discovery motion. Thus, Mr. Bollea is not in violation of any court order.

Notwithstanding the foregoing, Mr. Bollea has served a supplemental response to Interrogatory Nos. 9 and 10.

IV. MR. BOLLEA HAS PROVIDED ALL DOCUMENTS AND INFORMATION RESPONSIVE TO GAWKER'S REQUESTS AS NARROWED BY JUDGE CAMPBELL; THERE IS NO BASIS TO COMPEL A FURTHER RESPONSE.

Mr. Bollea has fully responded to the discovery at issue:

Interrogatory No. 9: Mr. Bollea previously objected to this interrogatory, and Judge Campbell sustained the objection. However, consistent with Judge Campbell's decision to permit Gawker to take discovery of Mr. Bollea's sexual relationship with Heather Clem, Mr. Bollea has served a supplemental response which states what Mr. Bollea remembers regarding the occasions when the two had sexual relations—nearly seven years ago. Mr. Bollea has no further recollection responsive to Interrogatory No. 9; however, Gawker can ask him questions