

# EXHIBIT 2

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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.

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**DEFENDANT A.J. DAULERIO'S RESPONSES  
TO PLAINTIFF'S FIRST SUPPLEMENTAL REQUEST  
FOR PRODUCTION OF DOCUMENTS**

Pursuant to Florida Rule of Civil Procedure 1.350, Defendant A.J. Daulerio ("Daulerio") hereby provides this response to Plaintiff's First Supplemental Request for Production of Documents dated January 28, 2014.

**SUPPLEMENTAL DEMAND AND RESPONSE**

**SUPPLEMENTAL DEMAND:** For each request for production of documents previously propounded by Terry Bollea to A.J. Daulerio in this action, produce any responsive documents within A.J. Daulerio's possession, custody, and control which have not previously been produced.

**RESPONSE:** Having responded to 84 requests, and having produced all relevant non-privileged documents within his possession custody or control, Daulerio objects to plaintiff's Supplemental Demand, effectively seeking to renew each of those 84 requests, as unlikely to lead to the discovery of admissible evidence and, as a result, unduly burdensome. Daulerio further objects to plaintiff's Supplemental Demand to the extent it could be construed as requesting him to undertake the burden of conducting a renewed search of his email account and

other documents; such a search is unlikely to lead to the discovery of admissible evidence, particularly given that (a) Daulerio, who no longer works for Gawker Media, LLC, has no reason to believe that any non-privileged, relevant documents created since his previous document production would be revealed by such a search and (b) documents related to the time period during which the Gawker Story and Excerpts were posted have already been produced. Daulerio further objects to plaintiff's Supplemental Demand to the extent that it does not seek the production of documents related to the underlying events at issue, but instead seeks the production of documents gathered by his attorneys in preparation of his defense of this action; such documents are protected against discovery by privilege, including but not limited to the attorney client privilege and attorney work-product doctrine.<sup>1</sup> Daulerio further objects to plaintiff's Supplemental Demand on each of the grounds previously asserted in connection with each of plaintiff's prior requests for production, and incorporates such prior objections as if fully set forth herein in their entirety. Subject to and without waiving the foregoing objections, Daulerio will produce any non-privileged, responsive documents responsive to plaintiff's Supplemental Demand of which he is aware.

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<sup>1</sup> As noted in footnote 1 of Daulerio's original document responses, Daulerio does not possess any documents protected by the attorney-client privilege and/or work product doctrine that were created prior to the commencement of the Lawsuit, as that term is defined in Plaintiff's Document Requests. Consistent with the prior practice of the parties, documents protected by attorney-client privilege and/or the work product doctrine created after the filing of the Lawsuit have not been logged. In addition, Daulerio will not produce pleadings and other papers filed in the Lawsuit, and communications among all counsel after the filing of the Lawsuit, as all such documents are already in the possession of Plaintiff and his counsel.

Dated: March 4, 2014

Respectfully submitted,

THOMAS & LOCICERO PL

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 4th day of March 2014, I caused a true and correct copy of the foregoing to be served via the Florida Courts' E-Filing Portal upon the following counsel of record:

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