

# EXHIBIT 12

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 RESPONSES TO  
GAWKER MEDIA, LLC'S INTERROGATORIES**

**PROPOUNDING PARTY: Defendant GAWKER MEDIA, LLC**

**RESPONDING PARTY: Plaintiff TERRY GENE BOLLEA**

**SET NO.: ONE**

Plaintiff TERRY GENE BOLLEA (herein "Responding Party") hereby responds to Interrogatories (Set One) propounded by defendant GAWKER MEDIA, LLC (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.

exist.

**INTERROGATORY 4:**

Identify any and all videotapes or other recordings of any type you have made of yourself engaged in Sexual Relations during the Relevant Time Period.

**RESPONSE TO INTERROGATORY 4:**

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 the Interrogatory is overbroad and burdensome to the extent that it seeks discovery of whether recordings were made or existed for private purposes, which have nothing to do with the public dissemination of a sex tape by Responding Party. Responding Party objects to this Interrogatory on the ground that it is so broad on its face that it requires production of irrelevant information. Responding Party further objects to this Interrogatory to the extent that it seeks information that is not relevant to the claims, defenses, or subject matter of the instant action, nor reasonably calculated to lead to the discovery of admissible evidence. Responding Party objects to this Interrogatory to the extent that it seeks to invade Responding Party's privacy and the privacy of third parties. Without waiver of the foregoing, Responding Party responds as follows: Responding Party has never made a recording of his sexual activity for the purpose of public dissemination, and has never consented to the making or dissemination of such a recording.

**INTERROGATORY 5:**

Identify any and all videotapes or other recordings of any type made of you having Sexual Relations during the Relevant Time Period.

**RESPONSE TO INTERROGATORY 5:**

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 the Interrogatory is overbroad and burdensome to the extent that it seeks discovery of whether recordings were made or existed for private purposes, which have nothing to do with the public dissemination of a sex tape by Responding Party. Responding Party objects to this Interrogatory on the ground that it is so broad on its face that it requires production of irrelevant information. Responding Party further objects to this Interrogatory to the extent that it seeks information that is not relevant to the claims, defenses, or subject matter of the instant action, nor reasonably calculated to lead to the discovery of admissible evidence. Responding Party objects to this Interrogatory to the extent that it seeks to invade Responding Party's privacy and the privacy of third parties.

Without waiver of the foregoing, Responding Party responds as follows: Responding Party has never made a recording of his sexual activity for the purpose of public dissemination, and has never consented to the making or dissemination of such a recording. Responding Party does not know if any other clandestine recordings exist other than the video depicting Responding Party having relations with Heather Clem (which was excerpted and posted by Gawker Media on its website).

**INTERROGATORY 6:**

Identify any and all writings authored by you during the Relevant Time Period regarding any Sexual Relations in which you engaged.

**RESPONSE TO INTERROGATORY 6:**

Responding Party objects to this Interrogatory to the extent that it seeks information

occurrence.

**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 the Interrogatory is overbroad and burdensome to the extent that it requires Responding Party to determine whether sex acts occurred which have nothing to do with the claims in this case. Responding Party objects to this Interrogatory on the ground that it is so broad on its face that it requires production of irrelevant information. Responding Party further objects to this Interrogatory to the extent that it seeks information that is not relevant to the claims, defenses, or subject matter of the instant action, nor reasonably calculated to lead to the discovery of admissible evidence. Responding Party objects to this Interrogatory to the extent that it is also repetitive and covered by other discovery requests. Responding Party objects to this Interrogatory to the extent that it seeks to invade Responding Party's privacy and the privacy of Heather Clem.

**INTERROGATORY 10:**

Identify any and all times you discussed having Sexual Relations with Heather Clem with her husband, Todd Alan Clem, during the Relevant Time Period, stating for each time the date, approximate time, location and substance of the discussion.

**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 objects to this Interrogatory on the ground that the Interrogatory is overbroad and burdensome, in that whether or not this topic was discussed with any frequency or any

specifics of such discussions other than whether such an encounter would be recorded and/or disseminated are irrelevant to the case. Responding Party objects to this Interrogatory on the ground that it is so broad on its face that it requires production of irrelevant information. Responding Party further objects to this Interrogatory to the extent that it seeks information that is not relevant to the claims, defenses, or subject matter of the instant action, nor reasonably calculated to lead to the discovery of admissible evidence. Responding Party objects to this Interrogatory to the extent that it seeks to invade Responding Party's privacy and the privacy of Heather Clem.

Without waiver of the foregoing, Responding Party responds as follows: During a period of approximately two years before Responding Party had sexual relations with Heather Clem, Todd Clem urged Responding Party, on numerous occasions, to have sexual relations with Heather Clem. Responding Party turned him down repeatedly throughout that time, and told Mr. Clem to stop bringing up the subject. In or about 2008, after Responding Party had separated from his wife, Responding Party gave in to the urgings of Mr. Clem and Heather Clem, and discussed the issue with Mr. Clem at that time. In or about Spring 2012, Responding Party asked Mr. Clem to explain the media reports regarding allegations of a possible sex tape involving Responding Party. Mr. Clem denied having any knowledge of or involvement in a sex tape. At no time prior to or during the sexual encounter with Ms. Clem did either Mr. or Ms. Clem ever state or imply to Responding Party that the encounter would be recorded. If such a statement had been made, Responding Party would not have consented to the recording, and would not have engaged in a recorded sexual encounter. At no time did Responding Party know that he would or might be recorded, and at no time did he give consent to anyone to either record the encounter or to disseminate any portion of a recording of the encounter to anyone.

substantially diminished” by defendants’ actions, and identify all documents relating to such claim, and all persons having knowledge of the facts relating to such claim.

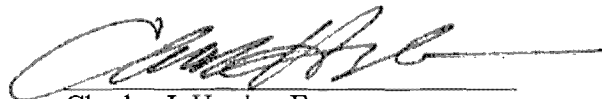
**RESPONSE TO INTERROGATORY 20:**

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 to the extent that it seeks to invade Responding Party’s privacy and the privacy of third parties.

Without waiver of the foregoing, Responding Party responds as follows: Discovery is continuing, and Gawker Media’s actions were by their very nature likely to harm the value of Responding Party’s name, image, identity, and/or persona. Additionally, Responding Party believes he may have lost the Rent-A-Center endorsement contract and work from World Wrestling Entertainment due to the publication of the Sex Tape. Former fans have also contacted Responding Party and indicated that they were no longer his fans due to the publication of the Sex Tape. However, Responding Party has not yet calculated the extent of such harm or the amount of any damages suffered.

DATED: August 21, 2013



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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 U.S. First Class Mail this 21 day of August, 2013 to the following:

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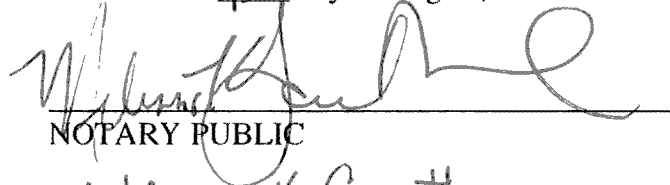
**VERIFICATION**

  
TERRY GENE BOLLEA

STATE OF FLORIDA  
COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared Terry Gene Bollea, known to me to be said person or who produced \_\_\_\_\_ as identification, who being first duly sworn, deposes and says that the above Responses to Gawker Media, LLC's Interrogatories herein are true and correct to the best of his/her knowledge and belief.

SWORN TO AND SUBSCRIBED before me this 22<sup>nd</sup> day of August, 2013.

  
NOTARY PUBLIC

Melissia K. Gauthreaux  
Printed Name of Notary Public

My Commission Expires:

5/12/17

