

# EXHIBIT 20

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  
REQUEST FOR PRODUCTION OF DOCUMENTS**

Plaintiff TERRY GENE BOLLEA (herein "Responding Party") hereby responds to Request for Production of Documents (Set One) propounded by defendant GAWKER MEDIA, LLC (herein "Propounding Party") as follows:

**PRELIMINARY STATEMENT**

Responding Party responds to the Requests for Production subject to, without waiver of, 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 his counsel since the service of these Requests. These responses reflect only Responding

First Set of Interrogatories to Plaintiff (the "Interrogatories") or consulted by you in connection with the preparation of your responses to the Interrogatories.

**RESPONSE TO REQUEST 1:**

Responding Party objects to this Request to the extent that it seeks documents protected from disclosure by the attorney-client privilege and/or attorney work product doctrine.

Responding Party objects to this Request on the ground that the requested documents are not identified with reasonable particularity. Responding Party objects to this Request on the ground that it is vague and ambiguous.

Without waiver of the foregoing, Responding Party responds as follows: To the extent non-privileged documents are identified in interrogatory responses and are not equally available to Gawker Media, Responding Party will endeavor to collect and produce them within a reasonable period of time.

**REQUEST 2:**

Any and all documents in any manner related to the Gawker Defendants, or any of them.

**RESPONSE TO REQUEST 2:**

Responding Party objects to this Request to the extent that it seeks documents protected from disclosure by the attorney-client privilege and/or attorney work product doctrine.

Responding Party objects to this Request on the ground that the requested documents are not identified with reasonable particularity. Responding Party objects to this Request on the ground that the Request is overbroad and burdensome in that it potentially sweeps within its scope documents of little relevance to the case. Responding Party objects to this Request on the ground that it is so broad on its face that it requires production of irrelevant documents and information. Responding Party further objects to this Request to the extent that it seeks

documents that are 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 Request on the ground that it is vague and ambiguous.

**REQUEST 3:**

Any and all documents in any manner related to the Video.

**RESPONSE TO REQUEST 3:**

Responding Party objects to this Request to the extent that it seeks documents protected from disclosure by the attorney-client privilege and/or attorney work product doctrine.

Responding Party objects to this Request on the ground that the requested documents are not identified with reasonable particularity.

Without waiver of the foregoing, Responding Party responds as follows: To the extent non-privileged documents exist and are not equally available to Gawker Media, Responding Party will endeavor to collect and produce them within a reasonable period of time.

**REQUEST 4:**

Any and all documents in any manner related to any communications you had about the Video.

**RESPONSE TO REQUEST 4:**

Responding Party objects to this Request to the extent that it seeks documents protected from disclosure by the attorney-client privilege and/or attorney work product doctrine.

Responding Party objects to this Request on the ground that the requested documents are not identified with reasonable particularity. Responding Party objects to this Request on the ground that the Request is overbroad and burdensome. Responding Party objects to this Request on the ground that it is so broad on its face that it requires production of irrelevant documents and

information. Responding Party further objects to this Request to the extent that it seeks documents that are 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 Request on the ground that it is vague and ambiguous.

Without waiver of the foregoing, Responding Party responds as follows: To the extent non-privileged documents exist which are relevant or reasonably likely to lead to the discovery of admissible evidence and are not equally available to Gawker Media, Responding Party will endeavor to collect and produce them within a reasonable period of time.

**REQUEST 5:**

Any and all documents in any manner related to the Gawker Story.

**RESPONSE TO REQUEST 5:**

Responding Party objects to this Request to the extent that it seeks documents protected from disclosure by the attorney-client privilege and/or attorney work product doctrine. Responding Party objects to this Request on the ground that the requested documents are not identified with reasonable particularity.

Without waiver of the foregoing, Responding Party responds as follows: To the extent non-privileged documents exist and are not equally available to Gawker Media, Responding Party will endeavor to collect and produce them within a reasonable period of time.

**REQUEST 6:**

Any and all documents concerning any employment by you during the Relevant Time Period.

**RESPONSE TO REQUEST 6:**

Responding Party objects to this Request to the extent that it seeks documents protected

nor reasonably calculated to lead to the discovery of admissible evidence. Responding Party objects to this Request to the extent that it seeks to invade Responding Party's privacy and the privacy of third parties.

**REQUEST 8:**

Any and all documents concerning any Sexual Relations you had with Heather Clem during the Relevant Time Period.

**RESPONSE TO REQUEST 8:**

Responding Party objects to this Request to the extent that it seeks documents protected from disclosure by the attorney-client privilege and/or attorney work product doctrine.

Responding Party objects to this Request on the ground that the requested documents are not identified with reasonable particularity. Responding Party objects to this Request on the ground that the Request is overbroad and burdensome. Responding Party objects to this Request on the ground that it is so broad on its face that it requires production of irrelevant documents and information. Responding Party further objects to this Request to the extent that it seeks documents that are 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 Request 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: To the extent non-privileged documents exist which are relevant or reasonably likely to lead to the discovery of admissible evidence and are not equally available to Gawker Media, Responding Party will endeavor to collect and produce them within a reasonable period of time.

responsive, non-privileged documents that relate to any sex tape that Responding Party made for the purpose of public dissemination.

**REQUEST 13:**

Any and all documents concerning any videotapes made of you engaged in Sexual Relations during the Relevant Time Period.

**RESPONSE TO REQUEST 13:**

Responding Party objects to this Request to the extent that it seeks documents protected from disclosure by the attorney-client privilege and/or attorney work product doctrine.

Responding Party objects to this Request on the ground that the Request is overbroad and burdensome. Responding Party objects to this Request on the ground that it is so broad on its face that it requires production of irrelevant documents and information. Responding Party further objects to this Request to the extent that it seeks documents that are 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 Request 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 is unaware of any recording of his sexual activity made for the purpose of public dissemination other than the video recording with Heather Clem made without his knowledge, and thus there are no responsive, non-privileged documents that relate to any recording of Responding Party having sex that were made for the purpose of public dissemination, other than documents relating to the Heather Clem sex tape. To the extent non-privileged documents exist relating to the Heather Clem sex tape, which are not equally available to Gawker Media, Responding Party will endeavor to collect and produce them within a reasonable period of time.

that you intend to or may rely upon during trial of this action, either as evidence or for purposes of impeachment, or for refreshing the recollection of a witness.

**RESPONSE TO REQUEST 50:**

Responding Party objects to this Request to the extent that it seeks documents protected from disclosure by the attorney-client privilege and/or attorney work product doctrine.

Responding Party objects to this Request on the ground that the requested documents are not identified with reasonable particularity. Responding Party further objects to this Request on the ground that it requires Responding Party to produce documents that would not be created until trial.

DATED: August 21, 2013

Respectfully submitted,



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