

# EXHIBIT 17

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 CONFIDENTIAL SUPPLEMENTAL  
RESPONSES TO INTERROGATORY NOS. 9 AND 10 PROPOUNDED BY  
GAWKER MEDIA, LLC**

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

**RESPONDING PARTY: Plaintiff TERRY GENE BOLLEA**

**SET NO.: ONE**

**THESE SUPPLEMENTAL RESPONSES ARE DESIGNATED "CONFIDENTIAL"  
PURSUANT TO THE PARTIES' PROTECTIVE ORDER. DISSEMINATION IS  
PROHIBITED EXCEPT AS PROVIDED IN THAT ORDER.**

Plaintiff TERRY GENE BOLLEA (herein "Responding Party") hereby supplements his  
response to Interrogatory Nos. 9 and 10 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.

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.

#### **SUPPLEMENTAL 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:**

Identify any and all times you had Sexual Relations with Heather Clem during the Relevant Time Period, stating for each time the date, approximate time, and location of the 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.

**CONFIDENTIAL SUPPLEMENTAL RESPONSE TO INTERROGATORY 9:**

Subject to and without waiver of the foregoing objections, Responding Party does not remember the exact number of sexual encounters with Heather Clem. To the best of Responding Party's recollection, there were at least two, and possibly three, sexual encounters with Heather Clem in her private bedroom at the Clems' residence, and one brief sexual encounter with Heather Clem at the radio station of Todd Clem's radio program. To the best of Responding Party's recollection, these encounters all occurred in approximately late spring/early summer of 2007, after Responding Party had separated from his wife.

**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.

**CONFIDENTIAL SUPPLEMENTAL RESPONSE TO INTERROGATORY 10:b**

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 approximately late spring/early summer of 2007, 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.

DATED: February 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-mail this 21st day of February, 2014 to the following:

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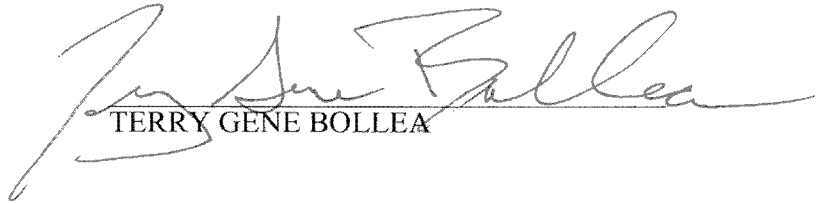
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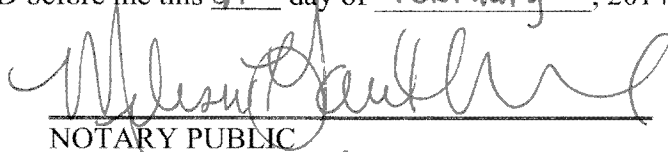
**VERIFICATION**

  
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 Confidential Supplemental Responses to Interrogatory Nos. 9 and 10 Propounded by Gawker Media, LLC herein are true and correct to the best of his/her knowledge and belief.

SWORN TO AND SUBSCRIBED before me this 21<sup>st</sup> day of February, 2014.

  
NOTARY PUBLIC

**MELISSIA K. GAUTHREAU**  
Notary Public, State of Florida  
My Comm. Expires May 12, 2017  
No. FF 16921

Melissia K. Gauthreaux  
Printed Name of Notary Public

My Commission Expires:

5-12-17