

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.

**OBJECTIONS OF TERRY BOLLEA TO NOTICES OF INTENT TO SERVE
SUBPOENAS FOR PRODUCTION OF DOCUMENTS WITHOUT DEPOSITION
AND PROPOSED NON-PARTY SUBPOENAS**

Plaintiff, Terry Gene Bollea (“Mr. Bollea”), by counsel, pursuant to Rule 1.351(b) of the Florida Rules of Civil Procedure, files this Objection to Gawker Media, LLC’s (“Gawker”) July 7, 2014 Notices of Intent to Serve Subpoenas for Production of Documents without Deposition and the corresponding proposed Subpoenas Duces Tecum without Deposition listed herein and directed towards: (1) Bay Harbor Hotel and Convention Center LLC; (2) Ben Mallah; (3) Cox Media Group; (4) Wortman Works Media & Marketing, Inc.; (5) Jules Wortman Pomeroy; (6) Tech Assets; (7) Marc Hardgrove; (8) Peter Young, Sovereign Talent Group; and (9) TNA Entertainment, LLC. Plaintiff states in support as follows:

{BC00052332:1}

1. With respect to the subpoena directed to **Bay Harbor Hotel and Convention Center LLC**, Mr. Bollea objects to the subpoena on the grounds that it is overbroad, oppressive, and harassing; it is not reasonably calculated to lead to the discovery of admissible evidence; and it invades upon Plaintiff's constitutional privacy rights. Further, Mr. Bollea objects to the subpoena to the extent it seeks documents in violation of Judge Campbell's February 26, 2014 protective order, which states that "inquiry into the . . . financial records . . . of Terry Bollea . . . is hereby prohibited."

2. With respect to the subpoena directed to **Ben Mallah**, Mr. Bollea objects to the subpoena on the grounds that it is overbroad, oppressive, and harassing; it is not reasonably calculated to lead to the discovery of admissible evidence; and it invades upon Plaintiff's constitutional privacy rights. Further, Mr. Bollea objects to the subpoena to the extent it seeks documents in violation of Judge Campbell's February 26, 2014 protective order, which states that "inquiry into the . . . financial records . . . of Terry Bollea . . . is hereby prohibited."

3. With respect to the subpoena directed to **Cox Media Group**, Mr. Bollea objects to the subpoena on the grounds that it is overbroad, oppressive, and harassing; and it is not reasonably calculated to lead to the discovery of admissible evidence.

4. With respect to the subpoena directed to **Wortman Works Media & Marketing, Inc.**, Mr. Bollea objects to the subpoena on the grounds that it is overbroad, oppressive, and harassing; it is not reasonably calculated to lead to the discovery of admissible evidence; and it invades upon Plaintiff's constitutional privacy rights. Further, Mr. Bollea objects to the subpoena to the extent it seeks documents in violation

of Judge Campbell's February 26, 2014 protective order, which states that "inquiry into the . . . financial records . . . of Terry Bollea . . . is hereby prohibited."

5. With respect to the subpoena directed to **Jules Wortman Pomeroy**, Mr. Bollea objects to the subpoena on the grounds that it is overbroad, oppressive, and harassing; it is not reasonably calculated to lead to the discovery of admissible evidence; and it invades upon Plaintiff's constitutional privacy rights. Further, Mr. Bollea objects to the subpoena to the extent it seeks documents in violation of Judge Campbell's February 26, 2014 protective order, which states that "inquiry into the . . . financial records . . . of Terry Bollea . . . is hereby prohibited."

6. With respect to the subpoena directed to **Tech Assets**, Mr. Bollea objects to the subpoena on the grounds that it is overbroad, oppressive, and harassing; it is not reasonably calculated to lead to the discovery of admissible evidence; and it invades upon Plaintiff's constitutional privacy rights. Further, Mr. Bollea objects to the subpoena to the extent it seeks documents in violation of Judge Campbell's February 26, 2014 protective order, which states that "inquiry into the . . . financial records . . . of Terry Bollea . . . is hereby prohibited."

7. With respect to the subpoena directed to **Marc Hardgrove**, Mr. Bollea objects to the subpoena on the grounds that it is overbroad, oppressive, and harassing; it is not reasonably calculated to lead to the discovery of admissible evidence; and it invades upon Plaintiff's constitutional privacy rights. Further, Mr. Bollea objects to the subpoena to the extent it seeks documents in violation of Judge Campbell's February 26, 2014 protective order, which states that "inquiry into the . . . financial records . . . of Terry Bollea . . . is hereby prohibited."

8. With respect to the subpoena directed to **Peter Young, Sovereign Talent Group**, Mr. Bollea objects to the subpoena on the grounds that it is overbroad, oppressive, and harassing; it is not reasonably calculated to lead to the discovery of admissible evidence; and it invades upon Plaintiff's constitutional privacy rights. Further, Mr. Bollea objects to the subpoena to the extent it seeks documents in violation of Judge Campbell's February 26, 2014 protective order, which states that "inquiry into the . . . financial records . . . of Terry Bollea . . . is hereby prohibited."

9. With respect to the subpoena directed to **TNA Entertainment, LLC**, Mr. Bollea objects to the subpoena on the grounds that it is overbroad, oppressive, and harassing; it is not reasonably calculated to lead to the discovery of admissible evidence; and it invades upon Plaintiff's constitutional privacy rights. Further, Mr. Bollea objects to the subpoena to the extent it seeks documents in violation of Judge Campbell's February 26, 2014 protective order, which states that "inquiry into the . . . financial records . . . of Terry Bollea . . . is hereby prohibited."

10. Pursuant to Rule 1.351(b) of the Florida Rules of Civil Procedure, because Mr. Bollea served this objection to the production sought in the subpoenas, "the documents or things shall not be produced pending the resolution of the objection...."

DATED: July 17, 2014

/s/ Kenneth G. Turkel
Kenneth G. Turkel, Esq.
Florida Bar No. 867233
Christina K. Ramirez, Esq.
Florida Bar No. 954497
BAJO | CUVA | COHEN | TURKEL
100 North Tampa Street, Suite 1900
Tampa, Florida 33602
Tel: (813) 443-2199
Fax: (813) 443-2193

Email: kturkel@bajocuva.com
Email: cramirez@bajocuva.com

-and-

Charles J. Harder, Esq.
PHV No. 102333
Douglas Mirell, Esq.
PHV No. 109885
Harder Mirell & Abrams LLP
1925 Century Park East, Suite 800
Los Angeles, CA 90067
Tel: (424) 203-1600
Fax: (424) 203-1601
charder@hmafirm.com
Counsel for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by E-Mail via the e-portal system this 17th day of July, 2014 to the following:

Barry A. Cohen, Esquire
Michael W. Gaines, Esquire
Barry Cohen, Esquire
Michael W. Gaines, Esquire
The Cohen Law Group
201 E. Kennedy Blvd., Suite 1000
Tampa, Florida 33602
bcohen@tampalawfirm.com
mgaines@tampalawfirm.com
nferdig@tampalawfirm.com
Counsel for Heather Clem

David R. Houston, Esquire
Law Office of David R. Houston
432 Court Street
Reno, NV 89501
dhouston@houstonatlaw.com

Gregg D. Thomas, Esquire
Rachel E. Fugate, Esquire
Thomas & LoCicero PL
601 S. Boulevard
Tampa, Florida 33606
gthomas@tlolawfirm.com
rfugate@tlolawfirm.com
kbrown@tlolawfirm.com
Counsel for Gawker Defendants

Seth D. Berlin, Esquire
Paul J. Safier, Esquire
Alia L. Smith, Esquire
Levine Sullivan Koch & Schulz, LLP
1899 L. Street, NW, Suite 200
Washington, DC 20036
sberlin@lskslaw.com
psafier@lskslaw.com
asmith@lskslaw.com
*Pro Hac Vice Counsel for
Gawker Defendants*

Julie B. Ehrlich, Esquire
Levine Sullivan Koch & Schultz, LLP
321 West 44th Street, Suite 1000
New York, NY 10036
jehlich@lskslaw.com
*Pro Hac Vice Counsel for
Gawker Defendants*

Michael Berry, Esquire
Levine Sullivan Koch & Schultz, LLP
1760 Market Street, Suite 1001
Philadelphia, PA 19103
mberry@lskslaw.com
*Pro Hac Vice Counsel for
Gawker Defendants*

Michael D. Sullivan
Levine Sullivan Koch & Schultz, LLP
1899 L Street, NW, Suite 200
Washington, DC 20036
msullivan@lskslaw.com
*Pro Hac Vice Counsel for
Gawker Defendants*

/s/ Kenneth G. Turkel
Attorney