

EXHIBIT I

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA

TERRY GENE BOLLEA professionally
known as HULK HOGAN,

Plaintiff,

SUBPOENA DUCES TECUM

vs.

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,

Case No. 12012447CI-011

Defendants.

SUBPOENA DUCES TECUM WITHOUT DEPOSITION

THE STATE OF FLORIDA:

TO: **Google Inc.**
Attn: Custodian of Records
1600 Amphitheatre Parkway
Mountain View, California 94043

YOU ARE COMMANDED by Plaintiff Terry Gene Bollea to produce the documents described in **Schedule A** to Charles J. Harder, Esq., Harder Mirell & Abrams LLP, 1925 Century Park East, Suite 800, Los Angeles, California 90067 at 10:00 a.m. twenty (20) days after this subpoena duces tecum is served upon you. If you fail to comply, you may be in contempt of court.

You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney, you shall respond to this subpoena as directed. You have a right to object to the subpoena under Florida Rule of Civil Procedure 1.410. You have the right to designate as Confidential any applicable document or testimony as specified under the Agreed Protective Order Governing Confidentiality, signed and ordered by the Court on July 25, 2013, a copy of which is attached hereto as Schedule B. A copy of the First Amended Complaint in this action is attached hereto for your reference as Schedule C.

DATED on _____.

Charles J. Harder
For the Court

Charles J. Harder
PHV No. 102333
Douglas E. Mirell
PHV No. 109885
Attorney for Terry Gene Bollea
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SCHEDULE A

Definitions and Instructions

As used in this Request for Production of Documents:

1. “YOU” or “YOUR” or “GOOGLE” means Google, Inc., its parent company, subsidiaries, affiliated companies, and all of their members, shareholders, managers, executives, officers, board members, employees, agents, representatives, attorneys, and all other PERSONS acting on behalf of any and all such PERSONS.
2. “COMMUNICATION(S)” means any correspondence, contact, discussion, or exchange between any two or more PERSONS. Without limiting the foregoing, “COMMUNICATION(S)” includes all DOCUMENTS (as defined below), telephone conversations or face to face conversations, meetings and conferences.
3. “DOCUMENT(S)” means all writings and recordings, including the originals and all non-identical copies, whether different from the original by reason of any notation made on such copies or otherwise (including but without limitation to, email and attachments, “instant” messages or “IM” messages, “wall” postings on Facebook, Myspace postings, Twitter postings or “tweets,” correspondence, memoranda, notes, diaries, minutes, statistics, letters, telegrams, contracts, reports, studies, checks, statements, tags, labels, invoices, brochures, periodicals, telegrams, receipts, returns, summaries, pamphlets, books, interoffice and intraoffice COMMUNICATIONS, offers, notations of any sort of conversations, working papers, applications, permits, file wrappers, indices, telephone calls, meetings or printouts, teletypes, telefax, invoices, worksheets, and all drafts, alterations, modifications, changes and amendments of any of the foregoing), graphic or aural representations of any kind (including without limitation, photographs, charts, microfiche, microfilm, videotape, recordings, motion pictures,

plans, drawings, surveys), and electronic, mechanical, magnetic, optical or electric records or representations of any kind (including without limitation, computer files and programs, tapes, cassettes, discs, recordings), including metadata.

4. “DAULERIO” means Defendant A.J. Daulerio, as well as any agents, attorneys and consultants therefor, and all other PERSONS acting or purporting to act on his behalf.

5. “DENTON” means Defendant Nick Denton, as well as any agents, attorneys and consultants therefor, and all other PERSONS acting or purporting to act on his behalf.

6. “EXIT TRAFFIC” means all traffic generated by USERS who were redirected to a webpage not belonging to the Gawker.com domain, as well as any other traffic defined as “exit traffic” by GOOGLE, GAWKER or KINJA / BLOGWIRE HUNGARY.

7. “GAWKER” means Defendant Gawker Media, LLC and its parent company, subsidiaries, affiliated companies, and all of their members, shareholders, managers, executives, officers, board members, employees, agents, representatives, attorneys, and all other PERSONS acting on behalf of any and all such PERSONS.

8. “GAWKER WEBSITES” means all websites owned or controlled by GAWKER, and/or within the GAWKER network, including all affiliate websites, including without limitation GAWKER.COM, DEADSPIN.COM, GIZMODO.COM, IO9.COM, JALOPNIK.COM, JEZEBEL.COM, KOTAKU.COM, LIFEHACKER.COM, and any of their respective sub-sites and/or webpages therein.

a. “GAWKER.COM” means any and all websites located at the gawker.com domain, including but not limited to www.gawker.com, valleywag.gawker.com, defamer.gawker.com, dog.gawker.com, morningafter.gawker.com and thevane.gawker.com.

b. “DEADSPIN.COM” means any and all websites located at the deadspin.com domain, including but not limited to www.deadspin.com, foodspin.deadspin.com, theconcourse.deadspin.com, fittish.deadspin.com, rabbithole.deadspin.com, regressing.deadspin.com, screamer.deadspin.com, screengrabber.deadspin.com and thestacks.deadspin.com.

c. “GIZMODO.COM” means any and all websites located at the gizmodo.com domain, including but not limited to www.gizmodo.com, whitenoise.gizmodo.com, fieldguide.gizmodo.com, indefinitelywild.gizmodo.com, leggodt.gizmodo.com, paleofuture.gizmodo.com, reframe.gizmodo.com and sploid.gizmodo.com.

d. “IO9.COM” means any and all websites located at the io9.com domain, including but not limited to www.io9.com, observationdeck.io9.com, animals.io9.com, animation.io9.com and space.io9.com.

e. “JALOPNIK.COM” means any and all websites located at the jalopnik.com domain, including but not limited to www.jalopnik.com, oppositelock.jalopnik.com, carbuying.jalopnik.com, code3.jalopnik.com, detroit.jalopnik.com, flightclub.jalopnik.com, foxtrotalpha.jalopnik.com, films.jalopnik.com, truckyeah.jalopnik.com and lanesplitter.jalopnik.com.

f. “JEZEBEL.COM” means any and all websites located at the jezebel.com domain, including but not limited to www.jezebel.com, powderroom.jezebel.com, kitchenette.jezebel.com, roygbiv.jezebel.com and thatswhatsheaid.jezebel.com.

g. “KOTAKU.COM” means any and all websites located at the kotaku.com domain, including but not limited to www.kotaku.com, tay.kotaku.com, cosplay.kotaku.com,

pocketmonster.kotaku.com, screenburn.kotaku.com, selects.kotaku.com, tmi.kotaku.com and watchlist.kotaku.com.

h. “LIFEHACKER.COM” means any and all websites located at the lifehacker.com domain, including but not limited to www.lifehacker.com, hackerspace.lifehacker.com, afterhours.lifehacker.com, twocents.lifehacker.com, wayfarer.lifehacker.com and workshop.lifehacker.com.

9. “GOOGLE TRENDS” means any and all websites located at the google.com/trends domain.

10. “GOOGLE TRENDS DATA” means all data underlying the information presented at GOOGLE TRENDS for a specified query or search term.

11. “KINJA / BLOGWIRE HUNGARY” means Defendant Kinja KFT, formally known as Blogwire Hungary Szellemi Alkotast Hasznosito KFT, and its parent company, subsidiaries, affiliated companies, and all of their members, shareholders, managers, executives, officers, board members, employees, agents, representatives, attorneys, and all other PERSONS acting on behalf of any and all such PERSONS.

12. “LAWSUIT” means the action currently pending before the Circuit Court of the Sixth Judicial Circuit, in and for Pinellas County, Florida, Case Number 12012447CI-011.

13. “PLAINTIFF” means Plaintiff Terry Gene Bollea, as well as any agents, attorneys and consultants therefor, and all other PERSONS acting or purporting to act on his behalf.

14. “PERSON” means any natural person, firm, partnership, association, proprietorship, joint venture, corporation, governmental agency, or other organization or legal or business entity, as well as any agents, attorneys and consultants therefor, and all other PERSONS acting or purporting to act on its behalf.

15. “POSTED NARRATIVE” means the story written by A.J. DAULERIO accompanying the “POSTED SEX VIDEO” available at <http://gawker.com/5948770/even-for-a-minute-watching-hulk-hogan-have-sex-in-a-canopy-bed-is-not-safe-for-work-but-watch-it-anyway>.

16. “POSTED SEX VIDEO” means the one minute forty-one second long video available at <http://gawker.com/5948770/even-for-a-minute-watching-hulk-hogan-have-sex-in-a-canopy-bed-is-not-safe-for-work-but-watch-it-anyway>.

17. “QUERY DATA” means all data collected or gathered by GOOGLE RELATING TO a query or search term.

18. “REFER TO” or “RELATE TO” means concerning, respecting, referring to, summarizing, digesting, embodying, reflecting, establishing, tending to establish, delegating from, tending not to establish, evidencing, not evidencing, comprising, connected with, commenting on, responding to, disagreeing with, showing, describing, analyzing, representing, constituting or including.

19. “USER” shall mean any PERSON or thing fitting within any definition of USER, as that term is used by GOOGLE, including without limitation the definitions located at <https://support.google.com/analytics/answer/2992042?hl=en>.

20. “WEBPAGE” shall mean the webpage located at <http://gawker.com/5948770/even-for-a-minute-watching-hulk-hogan-have-sex-in-a-canopy-bed-is-not-safe-for-work-but-watch-it-anyway>, which contains the “POSTED SEX VIDEO” and “POSTED NARRATIVE” defined above.

21. In the event any request herein calls for information or for the identification of a DOCUMENT which you deem to be privileged, in whole or in part, the information should be

given or the DOCUMENT identified to the fullest extent possible consistent with such claim of privilege, and you should state the nature of the privilege claimed and specify the grounds relied upon for the claim of privilege.

22. A separate answer shall be furnished for each request.

Requests

1. All DOCUMENTS that constitute, REFER or RELATE TO any contract or agreement between GAWKER and GOOGLE RELATING TO the provision of internet traffic analytics services.
2. All DOCUMENTS that constitute, REFER or RELATE TO any agreement between KINJA / BLOGWIRE HUNGARY and GOOGLE RELATING TO the provision of internet traffic analytics services.
3. All DOCUMENTS that constitute, REFER or RELATE TO any agreement between DENTON and GOOGLE RELATING TO the provision of internet traffic analytics services.
4. All DOCUMENTS that constitute any analytics, measurement, or service that GAWKER has paid or requested GOOGLE to provide GAWKER or any of the GAWKER WEBSITES during the period of January 1, 2011 to the present.
5. All DOCUMENTS that REFER, RELATE TO or describe any analytics, measurement, or service that GAWKER has paid or requested GOOGLE to provide GAWKER or any of the GAWKER WEBSITES during the period of January 1, 2011 to the present.
6. All DOCUMENTS that REFER or RELATE TO internet traffic to, including page views of, the webpage located at the URL <http://gawker.com/a-judge-told-us-to-take-down-our-hulk-hogan-sex-tape-po-481328088>.
7. All DOCUMENTS, including but not limited to COMMUNICATIONS, that constitute, REFER or RELATE TO any EXIT TRAFFIC statistics for the time period October 4, 2012 through April 25, 2013, for the webpage located at each of the following URLs, including without limitation information reflecting, REFERING or RELATING TO the number of USERS

who clicked on any links found on the webpage located at each of the following URLs, and which then directed the USER(S) to any of the GAWKER WEBSITES:

- a) <http://gawker.com/5948770/even-for-a-minute-watching-hulk-hogan-have-sex-in-a-canopy-bed-is-not-safe-for-work-but-watch-it-anyway>
- b) <http://gawker.com/5948770/even-for-a-minute-watching-hulk-hogan-have-sex-in-a-canopy-bed-is-not-safe-for-work-but-watch-it-anyway?popular=true>
- c) <http://gawker.com/5948770/even-for-a-minute-watching-hulk-hogan-have-sex-in-a-canopy-bed-is-not-safe-for-work-but-watch-it-anyway?tag=nsfw>
- d) <http://gawker.com/5948770/even-for-a-minute-watching-hulk-hogan-have-sex-in-a-canopy-bed-is-not-safe-for-work-but-watch-it-anyway/index.php>
- e) <http://gawker.com/5948770/even-for-a-minute-watching-hulk-hogan-have-sex-in-a-canopy-bed-is-not-safe-for-work-but-watch-it-anyway?tag=hulk-hogan-sex-tape>
- f) <http://gawker.com/5948770/even-for-a-minute-watching-hulk-hogan-have-sex-in-a-canopy-bed-is-not-safe-for-work-but-watch-it-anyway?post=53236920>
- g) <http://gawker.com/5948770/even-for-a-minute-watching-hulk-hogan-have-sex-in-a-canopy-bed-is-not-safe-for-work-but-watch-it-anyway?autoplay=1>
- h) www.gawker.com/5948770
- i) <http://gawker.com/5948770/even-for-a-minute-watching-hulk-hogan-have-sex-in-a-canopy-bed-is-not-safe-for-work-but-watch-it-anyway?tag=Hulk-hogan-sex-tape>
- j) <http://gawker.com/5948770/even-for-a-minute-watching-hulk-hogan-have-sex-in-a-canopy-bed-is-not-safe-for-work-but-watch-it-anyway?tag=heather-clem>

8. All DOCUMENTS, including but not limited to COMMUNICATIONS, that constitute, REFER or RELATE TO any EXIT TRAFFIC statistics for the time period October 4, 2012

through April 25, 2013, for any iteration or version of the WEBPAGE not covered by Request 7, including without limitation information reflecting, REFERING or RELATING TO the number of USERS who clicked on any links found on the WEBPAGE, and which directed the USER(S) to any of the GAWKER WEBSITES.

9. All DOCUMENTS, including but not limited to COMMUNICATIONS, that constitute, REFER or RELATE TO any EXIT TRAFFIC statistics for the time period January 1, 2011, through the present, for GAWKER.COM, including any sub-sites or webpages therein, including without limitation information reflecting, REFERING or RELATING TO the number of USERS who clicked on any link which directed the USER(S) to any of the GAWKER WEBSITES.

10. For the time period January 1, 2011 through the present, all QUERY DATA for the following terms:

- a. "Hulk Hogan"
- b. "Hulk"
- c. "Hogan"
- d. "Terry Gene Bollea"
- e. "Terry Bollea"
- f. "Bollea"
- g. "Heather Clem"
- h. "Clem"
- i. "Bubba Clem"
- j. "Bubba the Love Sponge"
- k. "Gawker"
- l. "Nick Denton"

- m. "Denton"
- n. "AJ Daulerio"
- o. "Daulerio"
- p. "Sex Tape"
- q. "Hulk Hogan Sex Tape"
- r. "Gawker Sex Tape"

11. For the time period January 1, 2011 through the present, all GOOGLE TRENDS DATA for the following terms:

- a. "Hulk Hogan"
- b. "Hulk"
- c. "Hogan"
- d. "Terry Gene Bollea"
- e. "Terry Bollea"
- f. "Bollea"
- g. "Heather Clem"
- h. "Clem"
- i. "Bubba Clem"
- j. "Bubba the Love Sponge"
- k. "Gawker"
- l. "Nick Denton"
- m. "Denton"
- n. "AJ Daulerio"
- o. "Daulerio"

- p. “Sex Tape”
- q. “Hulk Hogan Sex Tape”
- r. “Gawker Sex Tape”