

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

Plaintiff Terry Gene Bollea, by counsel, pursuant to Rule 1.351(b) of the Florida Rules of Civil Procedure, files these Objections to Gawker Media, LLC's November 12, 2014 Notice of Intent to Serve Subpoena for Production of Documents without Deposition and the corresponding proposed Subpoena Duces Tecum without Deposition directed towards Ron Howard.

1. With respect to the subpoena directed to **Ron Howard**, 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

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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." Furthermore, Mr. Bollea objects to the subpoena to the extent that it seeks documents in violation of Judge Case's November 11, 2014 Report and Recommendation Re: Defendant Gawker Media LLC's Motion to Overrule Objections to Third-Party Subpoenas and Plaintiff's Motion for Protective Orders.

2. 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 subpoena, "the documents or things shall not be produced pending the resolution of the objection . . . ."

DATED: November 26, 2014

/s/ Kenneth G. Turkel

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## 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 26<sup>th</sup> day of November, 2014 to the following:

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