

EXHIBIT 8

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

TERRY GENE BOLLEA professionally
known as HULK HOGAN,

Plaintiff,

Case No.: 12012447-CI-011

vs.

HEATHER CLEM; GAWKER MEDIA,
LLC aka GAWKER MEDIA; et al.,

Defendants.

**DEFENDANT GAWKER MEDIA, LLC'S RESPONSES
TO PLAINTIFF'S SECOND SET OF INTERROGATORIES**

Pursuant to Florida Rule of Civil Procedure 1.340, Defendant Gawker Media, LLC
("Gawker") hereby provides these responses to Plaintiff's Second Set of Interrogatories dated
June 27, 2013.

DEFINITIONS

1. The "Video" means the video and audio footage depicting Plaintiff Terry Gene Bollea that he claims was made without his consent in or about 2006 at issue in this lawsuit.
2. The "Gawker Story" means the story entitled "Even For a Minute, Watching Hulk Hogan Have Sex on a Canopy Bed is Not Safe For Work, But Watch It Anyway" published on www.gawker.com on or about October 4, 2012.
3. The "Excerpts" means the video file that was posted in connection with the Gawker Story, consisting of 101 seconds of footage excerpted from the Video.

RESPONSES

INTERROGATORY NO. 11: State all facts regarding Blogwire Hungary's role in the creation, editing, and/or posting of content on Gawker.com.

INTERROGATORY NO. 13: Identify each entity and/or individual which directly or indirectly receives money or other compensation that is generated by or originated by Gawker.com or any content thereon.

RESPONSE: Gawker objects to this interrogatory on the grounds that Plaintiff has exceeded the limit of interrogatories he may propound. *See* Fla. Rule 1.340(a) (“interrogatories shall not exceed 30, including all subparts”). Gawker further objects to this Request on the grounds that it is extraordinarily overbroad, unduly burdensome, and requests information that is neither relevant nor likely to lead to the discovery of admissible evidence, in that it necessarily encompasses hundreds of individuals and entities, including Gawker’s employees, contractors, freelancers, vendors, and others. Subject to and without waiving the foregoing objections, and with the caveat that Gawker can speak only for itself and not on behalf of other entities, Gawker responds to this interrogatory by incorporating by reference Gawker’s Response to Plaintiff’s Interrogatory No. 12, which describes (a) the ownership of Gawker Media, LLC (the publisher of Gawker.com) and Kinja, KFT, as well as distributions (if any) to their parent company, Gawker Media Group, Inc., and, (b) in connection with the period through December 2012, the ownership of the Former Subsidiaries and distributions to their parent company, Gawker Media, LLC.

INTERROGATORY NO. 14: Identify any vendor engaged to connect, assist in, or otherwise participate in any electronic discovery, computer searches, or database management with respect to documents that are relevant to this action.

RESPONSE: Gawker objects to this interrogatory on the grounds that Plaintiff has exceeded the limit of interrogatories he may propound. *See* Fla. Rule 1.340(a) (“interrogatories shall not exceed 30, including all subparts”). Gawker further objects to this interrogatory to the

extent that it suggests that plaintiff might attempt to take discovery from Gawker's litigation support vendor(s), which would be improper given that Gawker's and its counsel's communications with such vendor(s) are protected from discovery by privilege, including without limitation the attorney client privilege and attorney work product doctrine. Gawker intends to preserve such privileges and expressly objects to any effort by any other party or its counsel to contact such vendor(s) directly. Subject to and without waiving the foregoing objections, and without conceding that any of the documents requested by Plaintiff and produced by Gawker are necessarily "relevant to this action," Gawker states that it has engaged the following company to assist it with the gathering and production of electronic documents in this action:

Integreon
622 3rd Avenue
New York, NY 10017
(212) 476-7960

Dated: August 12, 2013

THOMAS & LOCICERO PL

By: /s/ Gregg D. Thomas
Gregg D. Thomas
Florida Bar No.: 223913
Rachel E. Fugate
Florida Bar No.: 0144029
601 South Boulevard
P.O. Box 2602 (33601)
Tampa, FL 33606
Telephone: (813) 984-3060
Facsimile: (813) 984-3070
gthomas@tlolawfirm.com
rfugate@tlolawfirm.com

and

Seth D. Berlin
Pro Hac Vice Number: 103440
Alia L. Smith
Pro Hac Vice Application Pending
Paul J. Safier
Pro Hac Vice Number: 103437
LEVINE SULLIVAN KOCH & SCHULZ, LLP
1899 L Street, NW, Suite 200
Washington, DC 20036
Telephone: (202) 508-1122
Facsimile: (202) 861-9888
sberlin@lskslaw.com
psafier@lskslaw.com

Counsel for Defendant Gawker Media, LLC

VERIFICATION

I, Scott Kidder, am the Vice President of Operations at Gawker Media, LLC (“Gawker”).

I am authorized to submit this verification on Gawker’s behalf in connection with Defendant Gawker Media, LLC’s Responses to Plaintiff’s Second Set of Interrogatories. I have read the foregoing responses and objections and verify that the facts set forth therein are true and correct to the best of my knowledge, information, and belief.




Scott Kidder

STATE OF NEW YORK

COUNTY OF NEW YORK

The foregoing Verification of Scott Kidder was SWORN TO AND SUBSCRIBED before me this 12 day of August 2013.



Notary Public, State of New York

Jesse Ma
Notary Public State of New York
New York County
Reg. No.: 02MA6225340
My Comm. Exp. 7-19-14

(Print, type, or stamp Commissioned name of Notary Public)