

EXHIBIT 7

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 THIRD SET OF INTERROGATORIES**

Pursuant to Florida Rule of Civil Procedure 1.340, Defendant Gawker Media, LLC
("Gawker") hereby provides these responses to Plaintiff's Third Set of Interrogatories dated
May 23, 2014.

INTERROGATORIES AND RESPONSES

INTERROGATORY NO. 15: IDENTIFY all software programs used and/or licensed
by YOU, and which are referred to at line 7000 of Gawker Media LLC's Income Statement
(GAWKER 18323_C), for the period January 1, 2010 to the present.

RESPONSE: Gawker objects to this Interrogatory on the grounds that, counting all
plaintiff's interrogatories and sub-parts, he has now exceeded the number of interrogatories he
may propound. *See* Fla. Rule 1.340(a) ("interrogatories shall not exceed 30, including all
subparts").

Gawker also objects to this Interrogatory to the extent that it purports to incorporate the
definition of "YOU," "YOUR," and "GAWKER" set forth in the introductory section of

Plaintiff's Third Set of Interrogatories. Gawker responds to this Interrogatory only on behalf of itself as the responding party.

Gawker further objects on the grounds that (a) the Interrogatory seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, (b) a request to identify every source of Gawker's advertising revenue over a four-year period (which, in the aggregate, totals millions of dollars collected from a large number of advertisers) is overbroad, unduly burdensome and unreasonable and (c) this information has already been requested from, and provided by, Gawker in response to Plaintiff's Request for Production of Documents No. 93 and the Court's February 26, 2014 order adjudicating plaintiff's motion to compel, in response to which Gawker produced more than 15,000 pages of documents disclosing this information for the period from 2009 through mid-March 2014.

Subject to and without waiving these objections, pursuant to Florida Rule 1.340(c), Gawker refers plaintiff to documents labeled GAWKER 001608_C to GAWKER 16708_C, which reflect the sources of Gawker's advertising revenue.

INTERROGATORY NO. 18: IDENTIFY every source of GAWKER'S "Other Revenue," as referred to at line 200 of Gawker Media LLC's Income Statement (GAWKER 18323 C), for the period January 1, 2010 to the present.

RESPONSE: Gawker objects to this Interrogatory on the grounds that, counting all plaintiff's interrogatories and sub-parts, he has now exceeded the number of interrogatories he may propound. *See* Fla. Rule 1.340(a) ("interrogatories shall not exceed 30, including all subparts").

Gawker also objects to this Interrogatory to the extent that it purports to incorporate the definition of "YOU," "YOUR," and "GAWKER" set forth in the introductory section of

Plaintiff's Third Set of Interrogatories. Gawker responds to this Interrogatory only on behalf of itself as the responding party.

Gawker further objects to this Interrogatory on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, and that, by seeking information about each individual source of "other" revenue over a four year period when Gawker has already produced more than 15,000 pages concerning its advertising revenue and detailed financial statements, the Interrogatory is overbroad and unduly burdensome. Gawker is unable to see how identifying the particular sources of non-advertising revenue it received over a four year period is in any way even arguably relevant to any issue in this action.

INTERROGATORY NO. 19: STATE ALL FACTS RELATING TO GAWKER'S payment of any "IP Royalty Expense," including that which is referred to at line 8300 of Gawker Media LLC's Income Statement (GAWKER 18323_C), for the period January 1, 2010 to the present, including the amount, to whom the payment is made, and for what products and/or services.

RESPONSE: Gawker objects to this Interrogatory on the grounds that, counting all plaintiff's interrogatories and sub-parts, he has now exceeded the number of interrogatories he may propound. *See* Fla. Rule 1.340(a) ("interrogatories shall not exceed 30, including all subparts").

Gawker also objects to this Interrogatory to the extent that it purports to incorporate the definition of "YOU," "YOUR," and "GAWKER" set forth in the introductory section of Plaintiff's Third Set of Interrogatories. Gawker responds to this Interrogatory only on behalf of itself as the responding party.

Gawker further objects to this Interrogatory on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, and that, by seeking information about each individual intellectual property payment over a four year period (including individual payments to photo agencies for the use of images), the Interrogatory is overbroad and unduly burdensome. Gawker is unable to see how stating all facts related to these individual expenses is in any way even arguably relevant to any issue in this action.

INTERROGATORY NO. 20: If it is YOUR contention that it was hypocritical of PLAINTIFF to have had consensual sex with HEATHER CLEM, STATE ALL FACTS supporting YOUR contention.

RESPONSE: Gawker objects to this Interrogatory on the grounds that, counting all plaintiff's interrogatories and sub-parts, he has now exceeded the number of interrogatories he may propound. *See* Fla. Rule 1.340(a) ("interrogatories shall not exceed 30, including all subparts").

Gawker also objects to this Interrogatory to the extent that it purports to incorporate the definition of "YOU," "YOUR," and "GAWKER" set forth in the introductory section of Plaintiff's Third Set of Interrogatories. Gawker responds to this Interrogatory only on behalf of itself as the responding party.

Gawker further objects on the grounds that the relevant legal inquiry in this case is not whether plaintiff's actions were hypocritical, but rather whether they related to a matter of public concern, as the Second District Court of Appeal has already decided. *See Gawker Media, LLC v. Bollea*, 129 So. 3d 1196 (Fla. 2d DCA 2014). Additionally, a request to "state *all facts*" about this broad topic is unduly burdensome and premature.

Dated: July 11, 2014

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

Seth D. Berlin

Pro Hac Vice Number: 103440

Michael Berry

Pro Hac Vice Number: 108191

Alia L. Smith

Pro Hac Vice Number: 104249

Paul J. Safier

Pro Hac Vice Number: 103437

Julie B. Ehrlich

Pro Hac Vice Number: 108190

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

mberry@lskslaw.com

asmith@lskslaw.com

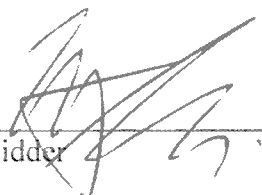
psafier@lskslaw.com

jehrich@lskslaw.com

Counsel for Defendant Gawker Media, LLC

VERIFICATION

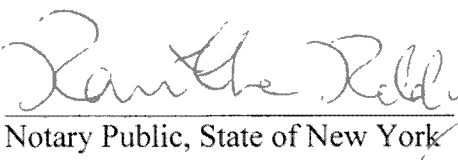
I, Scott Kidder, am the Vice President of Operations at Gawker Media, LLC (“Gawker”). I am authorized to submit this verification on Gawker’s behalf in connection with Defendant Gawker Media, LLC’s Responses to Plaintiff’s Third Set of Interrogatories. I have read the foregoing responses and objections and verify that the facts set forth therein are true and correct to the best of my knowledge, information, and belief.



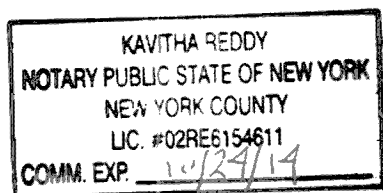
Scott Kidder

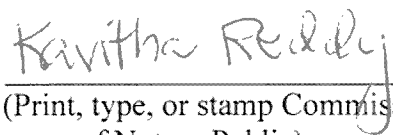
STATE OF NEW YORK
COUNTY OF NEW YORK

The foregoing Verification of Scott Kidder was SWORN TO AND SUBSCRIBED before me this 10 day of July 2014.



Notary Public, State of New York





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