

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 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 January 7, 2015 Notice of Intent to Serve Subpoena for Production of Documents without Deposition and the corresponding proposed Subpoena Duces Tecum without Deposition directed towards Bubba Clem.

1. With respect to Requests 2 and 3, Mr. Bollea objects to the Requests on the grounds that they are overbroad, oppressive, and harassing; are not reasonably calculated to lead to the discovery of admissible evidence; and invade upon Plaintiff's constitutional privacy rights. Mr. Bollea further objects to the Requests to the extent that

the Requests are duplicative of discovery previously served on and responded to by Mr. Bollea.

2. With respect to Request No. 4, Mr. Bollea objects to the Request to the extent that it seeks the production of documents protected from disclosure by the attorney-client privilege and/or attorney work product doctrine. Mr. Bollea further objects to the Request to the extent that it seeks the production of documents protected from disclosure by the settlement privilege.

3. 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: January 22, 2015

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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 22nd day of January, 2015 to the following:

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