## IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT IN AND FOR PINELLAS COUNTY, FLORIDA CASE NUMBER: 12012447CI-011

TERRY GENE BOLLEA professionally known as HULK HOGAN,

Plaintiff,

VS.

HEATHER CLEM, GAWKER MEDIA, LLC a/k/a GAWKER MEDIA; et al.,

Defendant.
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## RESPONSE TO SUBPOENA DUCES TECUM WITHOUT DEPOSITION SERVED ON BUBBA THE LOVE SPONGE CLEM

- 1. Mr. Clem is not in possession of any responsive documents.
- 2. Mr. Clem is not in possession of any responsive documents.
- 3. Mr. Clem is not in possession of any responsive documents.
- 4. Mr. Clem is not in possession of any responsive documents.
- 5. Mr. Clem is not in possession of any responsive documents, nor are there any private twitter messages relating to the subject matter contained within request #5. Subject to Judge Campbell's May 14, 2014 Order on discovery motions, Mr. Clem will "preserve until thirty (30) days after the termination of this action, including without limitation any appeals, any public tweets pertaining to the Bollea video so they are accessible to the parties."
- 6. Mr. Clem is not in possession of any responsive documents, nor are there any private twitter messages relating to the subject matter contained within request #6. Subject to Judge Campbell's May 14, 2014 Order on discovery motions, Mr. Clem will "preserve until thirty (30) days after the termination of this action, including without limitation any appeals, any public tweets pertaining to the Bollea video so they are accessible to the parties."
- 7. Mr. Clem is not in possession of any responsive documents, nor are there any private twitter messages relating to the subject matter contained within request #7. Subject to Judge Campbell's May 14, 2014 Order on discovery motions, Mr. Clem will "preserve until thirty (30) days after the termination of this action, including without limitation any appeals, any public tweets pertaining to the Bollea video so they are accessible to the parties."

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this day of January, 2015, I electronically filed the foregoing with the Clerk of Courts by using the ECF system which will send a notice of electronic filing to: gthomas@tlolawfirm.com; rfugate@tlolawfirm.com.

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