

EXHIBIT 2

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.

**PLAINTIFF TERRY GENE BOLLEA'S RESPONSES TO
GAWKER MEDIA, LLC'S INTERROGATORIES**

PROPOUNDING PARTY: Defendant GAWKER MEDIA, LLC

RESPONDING PARTY: Plaintiff TERRY GENE BOLLEA

SET NO.: ONE

Plaintiff TERRY GENE BOLLEA (herein "Responding Party") hereby responds to Interrogatories (Set One) propounded by defendant GAWKER MEDIA, LLC (herein "Propounding Party") as follows:

PRELIMINARY STATEMENT

Responding Party responds to the Interrogatories subject to, without intending to waive, and expressly preserving: (a) any objections as to the competency, relevance, materiality, privilege or admissibility of any of the responses or any of the documents identified in any response hereto; and (b) the right at any time to revise, correct, supplement or clarify any of the responses herein.

INTERROGATORY 11:

Identify the “market value” of the use of your publicity rights as alleged in paragraph 82 of the Complaint, explaining with particularity the basis for your calculation of such purported “market value.”

RESPONSE TO INTERROGATORY 11:

Responding Party objects to this Interrogatory to the extent that it seeks information protected from disclosure by the attorney-client privilege and/or attorney work product doctrine. Responding Party objects to this Interrogatory to the extent that it prematurely calls for expert opinion and analysis.

Without waiver of the foregoing, Responding Party responds as follows: Discovery is continuing regarding the market value of the use of Responding Party’s publicity rights.

INTERROGATORY 12:

Identify any and all damages purportedly suffered by you as a result of alleged actions by the Gawker Defendants or any of them, explaining with particularity the basis for your calculation of such alleged damages.

RESPONSE TO INTERROGATORY 12:

Responding Party objects to this Interrogatory to the extent that it seeks information protected from disclosure by the attorney-client privilege and/or attorney work product doctrine. Responding Party objects to this Interrogatory to the extent that it prematurely calls for expert opinion and analysis.

Without waiver of the foregoing, Responding Party responds as follows: Discovery is continuing, and Responding Party is still assessing and calculating his damages.

substantially diminished” by defendants’ actions, and identify all documents relating to such claim, and all persons having knowledge of the facts relating to such claim.

RESPONSE TO INTERROGATORY 20:

Responding Party objects to this Interrogatory to the extent that it seeks information protected from disclosure by the attorney-client privilege and/or attorney work product doctrine.

Responding Party objects to this Interrogatory to the extent that it seeks to invade Responding Party’s privacy and the privacy of third parties.

Without waiver of the foregoing, Responding Party responds as follows: Discovery is continuing, and Gawker Media’s actions were by their very nature likely to harm the value of Responding Party’s name, image, identity, and/or persona. Additionally, Responding Party believes he may have lost the Rent-A-Center endorsement contract and work from World Wrestling Entertainment due to the publication of the Sex Tape. Former fans have also contacted Responding Party and indicated that they were no longer his fans due to the publication of the Sex Tape. However, Responding Party has not yet calculated the extent of such harm or the amount of any damages suffered.

DATED: August 21, 2013



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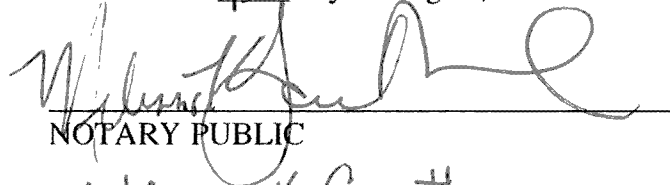
VERIFICATION


TERRY GENE BOLLEA

STATE OF FLORIDA
COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared Terry Gene Bollea, known to me to be said person or who produced _____ as identification, who being first duly sworn, deposes and says that the above Responses to Gawker Media, LLC's Interrogatories herein are true and correct to the best of his/her knowledge and belief.

SWORN TO AND SUBSCRIBED before me this 22nd day of August, 2013.


NOTARY PUBLIC

Melissia K. Gauthreaux
Printed Name of Notary Public

My Commission Expires:

5/12/17

