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.			
	/		

<u>DEFENDANT GAWKER MEDIA, LLC'S FIFTH</u> REQUEST FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF

Pursuant to Rule 1.350 of the Florida Rules of Civil Procedure, defendant Gawker Media, LLC, ("Gawker") by its undersigned counsel, hereby requests that plaintiff Terry Gene Bollea produce for inspection and copying the following documents and things within thirty (30) days after service of this request.

Instructions and Definitions

- 1. "You" and "your" mean the plaintiff Terry Gene Bollea, and any agents, attorneys, or other persons or entities acting for or on behalf of him or in concert with him, including without limitation any personal services corporations that make available or license services of plaintiff. The request seeks all information in the possession, custody or control of all such persons and/or entities.
- 2. "Terry Bollea" means Terry Gene Bollea (professionally known as "Hulk Hogan").
 - 3. "Hulk Hogan" means the character played by Terry Bollea.

Requests for Production

Request No. 65: All documents that support your calculation of the reasonable value of a publicly released sex tape featuring Hulk Hogan as identified as one of your alleged damages in response to Interrogatory No. 12 propounded by defendant Gawker Media, LLC.

Request No. 66: All documents relating to the qualifications of the IT expert.

Request No. 67: All documents that each expert identified in your response to Interrogatory No. 25 of defendant Nick Denton's Third Set of Interrogatories reviewed and on which each expert relied in reaching his or her opinion.

Request No. 68: All documents identified in, or relating to, your response to Interrogatory No. 26 of defendant Nick Denton's Third Set of Interrogatories.

Request No. 69: All documents relating to your response to Interrogatory No. 25 of defendant Nick Denton's Third Set of Interrogatories.

Request No. 70: A curriculum vitae for each expert identified in response to Interrogatory No. 25.

Request No. 71: For each request for production of documents previously propounded to you by Gawker or any of the other defendants in this action, produce any responsive documents within your possession, custody, and control that have not previously been produced.

Request No. 72: All text messages and iMessages sent to or received from Mike Walters in March, April, and October 2012.

Request No. 73: All text messages sent to or received from phone number REDACTED in March, April, and October 2012.

Respectfully submitted,

THOMAS & LOCICERO PL

By: 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

Michael Sullivan

Pro Hac Vice Number: 53347

Michael Berry

Pro Hac Vice Number: 108191

Alia L. Smith

Pro Hac Vice Number: 104249

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 msullivan@lskslaw.com mberry@lskslaw.com asmith@lskslaw.com psafier@lskslaw.com

Counsel for Gawker Media, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18th day of December, 2014, I caused a true and correct copy of the foregoing to be served by email upon the following counsel of record:

Kenneth G. Turkel, Esq.

kturkel@BajoCuva.com

Christina K. Ramirez, Esq.

cramirez@BajoCuva.com

Bajo Cuva Cohen & Turkel, P.A.

100 N. Tampa Street, Suite 1900

Tampa, FL 33602

Tel: (813) 443-2199 Fax: (813) 443-2193

Charles J. Harder, Esq.
charder@HMAfirm.com
Douglas E. Mirell, Esq.
dmirell@HMAfirm.com
Sarah Luppen, Esq.
sluppe@HMAfirm.com
Harder Mirell & Abrams LLP
1925 Century Park East, Suite 800
Los Angeles, CA 90067

Tel: (424) 203-1600; Fax: (424) 203-1601

Attorneys for Plaintiff

Barry A. Cohen, Esq.
bcohen@tampalawfirm.com
Michael W. Gaines
mgaines@tampalawfirm.com
Barry A. Cohen Law Group
201 East Kennedy Boulevard, Suite 1950
Tampa, FL 33602
Tel: (813) 225-1655
Fax: (813) 225-1921

Attorneys for Defendant Heather Clem

David Houston, Esq.
Law Office of David Houston
dhouston@houstonatlaw.com
432 Court Street
Reno, NV 89501

Tel: (775) 786-4188

<u>/s Gregg Thomas</u>

Attorney