

# EXHIBIT 9

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.

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**PLAINTIFF TERRY GENE BOLLEA'S RESPONSES TO GAWKER MEDIA, LLC'S  
FIFTH REQUEST FOR PRODUCTION OF DOCUMENTS**

Plaintiff TERRY GENE BOLLEA (herein "Responding Party") hereby responds to Request for Production of Documents (Set Five) ("Request" or "Requests") propounded by defendant GAWKER MEDIA, LLC (herein "Propounding Party") as follows:

**PRELIMINARY STATEMENT**

Responding Party responds to the Requests for Production subject to, without waiver of, 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.

These responses are based upon a diligent investigation undertaken by Responding Party and his counsel since the service of these Requests. These responses reflect only Responding

**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.

**RESPONSE TO REQUEST NO. 65**

Responding Party incorporates by this reference each and every general objection as though fully set forth herein. Responding Party objects to this 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. Responding Party further objects to this Request on the ground that it seeks the production of documents containing private, confidential, and/or proprietary information or trade secrets. Responding Party objects to this Request on the ground that the requested documents are not identified with reasonable particularity. Responding Party objects to this Request to the extent that it is made to cause annoyance, oppression, and undue burden and expense to Responding Party. Responding Party further objects to this Request to the extent it is duplicative and/or identical of other discovery propounded and/or issued by Propounding Party or any other defendant in this case to which Responding Party has already objected and/or responded, and for which applicable motion to compel and/or any other deadlines have already expired. Responding Party objects to this Request to the extent that it is duplicative of Propounding Party's requests to Responding Party in this case and/or seeks documents already in the defendants' possession, custody or control or which are equally available to Propounding Party.

Without waiving or otherwise limiting the above objections, Responding Party responds

as follows: Responding Party objects to this Request on the ground that it is a premature attempt to obtain initial expert discovery prior to the March 6, 2015, due date for initial expert disclosures agreed to by the parties and ordered by Judge Campbell. Responding Party will provide responsive, non-privileged, documents to Propounding Party on that date, subject to any stipulated extensions entered before that time.

**REQUEST NO. 66**

All documents relating to the qualifications of the IT expert.

**RESPONSE TO REQUEST NO. 66**

Responding Party incorporates by this reference each and every general objection as though fully set forth herein. Responding Party objects to this 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. Responding Party further objects to this Request on the ground that it seeks the production of documents containing private, confidential, and/or proprietary information or trade secrets. Responding Party objects to this Request on the ground that the requested documents are not identified with reasonable particularity. Responding Party objects to this Request on the ground that the requested documents are unlimited as to time and scope. Responding Party objects to this Request to the extent that it is made to cause annoyance, oppression, and undue burden and expense to Responding Party. Responding Party objects to this Request to the extent that it is duplicative of Propounding Party's requests to Responding Party in this case and/or seeks documents already in the defendants' possession, custody or control or which are equally available to Propounding Party. Responding Party further objects to this Request to the extent that it seeks documents that are not relevant to the claims, defenses, or subject matter of the instant action, nor reasonably calculated to lead to the discovery of

motion to compel and/or any other deadlines have already expired. Responding Party further objects to this Request to the extent that it seeks documents that are not relevant to the claims, defenses, or subject matter of the instant action, nor reasonably calculated to lead to the discovery of admissible evidence.

Without waiving or otherwise limiting the above objections, Responding Party responds as follows: Responding Party refers Propounding Party to the Exhibit provided in response to Defendant Nick Denton's First Set of Interrogatories and to correspondence sent on October 15, 2014, by Charles Harder to the court and counsel of record. Subject to the foregoing objections, Responding Party is presently unaware of any further responsive documents.

DATED: January 22, 2015

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-and-

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Counsel for Plaintiff

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by E-Mail this 22nd day of January, 2015 to the following:

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