

EXHIBIT B

to the

**GAWKER DEFENDANTS' MOTION FOR ACCESS TO CORRECTED AND
UNREDACTED DVDS PRODUCED BY THE FBI**

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 CONFIDENTIAL SECOND SUPPLEMENTAL
RESPONSE TO INTERROGATORY 9 PROPOUNDED BY A.J. DAULERIO**

PROPOUNDING PARTY: Defendant A.J. DAULERIO

RESPONDING PARTY: Plaintiff TERRY GENE BOLLEA

SET NO.: TWO

**THIS SECOND SUPPLEMENTAL RESPONSE IS DESIGNATED "CONFIDENTIAL –
ATTORNEY'S EYES ONLY" PURSUANT TO THE PARTIES' PROTECTIVE ORDER
AS AMENDED BY THE ORAL RULING OF JUDGE CAMPBELL ON APRIL 23, 2014.**

DISSEMINATION IS PROHIBITED EXCEPT AS PROVIDED IN THAT ORDER.

Plaintiff TERRY GENE BOLLEA (herein "Responding Party") hereby supplements his
response to Interrogatory 9 propounded by defendant A.J. DAULERIO (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.

These responses are based upon a diligent investigation undertaken by Responding Party and its counsel since the service of these Interrogatories. These responses reflect only Responding Party's current understanding, belief and knowledge regarding the matters about which inquiry was made. Responding Party has not yet had sufficient opportunity to depose or interview all persons who may have knowledge of relevant facts, or to discover or otherwise obtain and review all documents which may have some bearing on this case.

Consequently, there may exist further information, documents and persons with knowledge relevant to these Interrogatories of which Responding Party is not currently aware. As this action proceeds, Responding Party anticipates that further facts, witnesses and documents may be discovered or identified. Without in any way obligating it to do so, Responding Party reserves the right to offer further or different evidence or information at trial or at any pretrial proceeding. These responses are not in any way to be deemed an admission or representation that there are no further facts, documents or witnesses having knowledge relevant to the subject matter of these Interrogatories.

GENERAL OBJECTIONS

1. The following Responses, and each of them, are based upon information and writings presently available to, and located by, Responding Party and its attorneys. Responding Party has not completed an investigation of the facts or discovery proceedings in this case and has not completed its preparation for trial. The following Responses, and each of them, are made

without prejudice to Responding Party's right to produce evidence based on subsequently discovered facts or documents, and to offer such facts or documents in evidence at the time of trial. The fact that Responding Party has responded to an Interrogatory should not be taken as an admission that Responding Party accepts or admits the existence of any facts set forth or assumed by such Interrogatory, or that such Response constitutes admissible evidence. The following Responses, and each of them, are made without prejudice to the rights of Responding Party to introduce evidence of any subsequently discovered facts or documents which Responding Party may later obtain, discover or recall.

2. The documents and information which could or would form the basis of responses to the instant Interrogatories, in whole or in part, are still in the process of being identified by Responding Party, and all such relevant documents and information have not yet been identified, examined or produced. In addition, the significance of documents and information which may now be in the possession of Responding Party may only become apparent upon further discovery and review of those documents and information in the context of other documents which have not yet been identified or obtained in the context of later testimony or discovery which may establish their relevance.

3. These Responses are made, and any and all documents are being produced, solely for the purposes of this litigation. Any documents supplied in response to the Requests are being supplied by Responding Party subject to all objections as to competence, relevance, materiality, propriety and admissibility, and to any and all other objections on any ground that would require the exclusion of any document or portion thereof, if such document were offered in evidence in Court, all of which objections and ground are expressly reserved and may be interposed at the time of trial.

4. Responding Party, accordingly, reserves the right to alter or modify any and all Responses set forth herein as additional facts may be ascertained, documents discovered, analyses made, witnesses identified, additional parties identified, legal research completed, and contentions made or expanded.

5. Responding Party objects generally to each and every Interrogatory to the extent it calls for information that is protected by the attorney-client privilege and/or the attorney work product doctrine.

6. Responding Party objects generally to each and every Interrogatory to the extent it requests any information concerning the content of conversations of any other party to this action or documents in the possession of any other party to this action, other than the Responding Party, in that such information is equally accessible to all parties.

7. Responding Party objects to producing any private and/or confidential business or proprietary information or trade secrets.

8. Responding Party objects to these Interrogatories, and each of them, to the extent they are not limited to the subject matter of this action and thus are irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

9. Responding Party objects to these Interrogatories, and each of them, to the extent they are unduly burdensome, oppressive, unreasonably cumulative, duplicative and overbroad.

10. Responding Party objects to these Interrogatories, and each of them, to the extent they seek information to which Propounding Party has equal access.

SUPPLEMENTAL RESPONSES

The Preliminary Statement and General Objections are incorporated into each response below, regardless of whether specifically mentioned. The specific objections set forth below are

not a waiver, in whole or in part, of any of the foregoing General Objections. Subject to and without waiver of these objections, Responding Party responds below.

INTERROGATORY 9:

Describe in detail every communication you or someone acting on your behalf had with any law enforcement agency, or any employee thereof, concerning any recording of you having sexual relations with Heather Clem, including without limitation the date of the communications, the participants to the communication (or if a written communication the sender(s) and all recipients), the substance of the communication, and any response to the communication.

RESPONSE TO INTERROGATORY 9:

Responding Party object 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 on the ground that it seeks information protected by the law enforcement investigatory privilege. Responding Party further objects to this Interrogatory on the ground that it is not reasonably likely to lead to the discovery of admissible evidence. Responding Party objects to this Interrogatory as invasive of Responding Party's privacy and the privacy of Heather Clem. Responding Party further objects to this Interrogatory on the grounds of overbreadth.

CONFIDENTIAL SUPPLEMENTAL RESPONSE TO INTERROGATORY 9:

Subject to and without waiver of the foregoing objections, pursuant to Florida Rule of Civil Procedure 1.340, Responding Party directs Propounding Party to Documents BOLLEA 001068 through BOLLEA 001354 for information regarding communications with the Federal Bureau of Investigation (the "FBI"), agent Jason R. Shearn, and the U.S. Attorney's Office for the Middle District of Florida, Assistant U.S. Attorneys Sara Sweeney and Robert A.

Mosakowski.

Further, Responding Party responds as follows:

In or about the fall of 2012, Plaintiff and David Houston met with FBI agents on approximately two to three occasions at the FBI office in Tampa, Florida. Those meetings concerned the FBI's criminal investigation into the dissemination of the surreptitious recording of Plaintiff engaged in sexual relations with Heather Clem. In addition, during that same timeframe, Mr. Houston made approximately two controlled telephone calls to Keith Davidson from the FBI office in Tampa, Florida, so that the FBI agents could record and witness those calls. Mr. Houston further recalls that on approximately two to three occasions during that timeframe, he spoke with FBI agents over the telephone regarding scheduling the aforementioned in-person meetings.

Mr. Houston believes that he may have, at an unknown time prior to initiating contact with the FBI, contacted an officer affiliated with the St. Petersburg Police Department regarding the surreptitious recording of Plaintiff engaged in sexual relations with Heather Clem. Mr. Houston cannot remember the name of the person contacted or the exact substance of the conversation, but recalls that the officer and/or police department seemed uninterested in pursuing the case due to statute of limitations concerns.

In or about February or March 2014, Mr. Houston had approximately one to two telephone conversations with Jason R. Shearn of the FBI regarding the criminal investigation into the dissemination of the surreptitious recording of Plaintiff engaged in sexual relations with Heather Clem.

In or about January 2013, Charles Harder had approximately two telephone conversations with Jason R. Shearn of the FBI regarding its criminal investigation into the dissemination of the

surreptitious recording of Plaintiff engaged in sexual relations with Heather Clem.

In or about March 2014, Mr. Harder had approximately one to two telephone conversations with Jason R. Shearn of the FBI regarding the criminal investigation into the dissemination of the surreptitious recording of Plaintiff engaged in sexual relations with Heather Clem, and the issue of disclosure of communications regarding that investigation.

In or about March 2014, Mr. Harder had approximately one to two telephone conversations with Sara Sweeney of the U.S. Attorney's Office for the Middle District of Florida regarding the criminal investigation into the dissemination of the surreptitious recording of Plaintiff engaged in sexual relations with Heather Clem, and the issue of disclosure of communications regarding that investigation.

In or about March 2014, Ken Turkel had approximately two to three telephone conversations with Sara Sweeney and Robert A. Mosakowski of the U.S. Attorney's Office for the Middle District of Florida regarding the issue of disclosure of communications regarding that investigation.

CONFIDENTIAL SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY 9:

Subject to and without waiver of the foregoing objections, pursuant to Florida Rule of Civil Procedure 1.340, Responding Party directs Propounding Party to Documents BOLLEA 001068 through BOLLEA 001354 for information regarding communications with the Federal Bureau of Investigation (the "FBI"), agent Jason R. Shearn, and the U.S. Attorney's Office for the Middle District of Florida, Assistant U.S. Attorneys Sara Sweeney and Robert A. Mosakowski.

Further, Responding Party responds as follows:

In or about the fall of 2012, Plaintiff and David Houston met with FBI agents on

approximately two to three occasions at the FBI office in Tampa, Florida. Those meetings concerned the FBI's criminal investigation into the dissemination of the surreptitious recording of Plaintiff engaged in sexual relations with Heather Clem. In addition, during that same timeframe, Mr. Houston made approximately two controlled telephone calls to Keith Davidson from the FBI office in Tampa, Florida, so that the FBI agents could record and witness those calls. Mr. Houston further recalls that on approximately two to three occasions during that timeframe, he spoke with FBI agents over the telephone regarding scheduling the aforementioned in-person meetings.

Mr. Houston believes that he may have, at an unknown time prior to initiating contact with the FBI, contacted an officer affiliated with the St. Petersburg Police Department regarding the surreptitious recording of Plaintiff engaged in sexual relations with Heather Clem. Mr. Houston cannot remember the name of the person contacted or the exact substance of the conversation, but recalls that the officer and/or police department seemed uninterested in pursuing the case due to statute of limitations concerns.

In or about February or March 2014, Mr. Houston had approximately one to two telephone conversations with Jason R. Shearn of the FBI regarding the criminal investigation into the dissemination of the surreptitious recording of Plaintiff engaged in sexual relations with Heather Clem.

In or about January 2013, Charles Harder had approximately two telephone conversations with Jason R. Shearn of the FBI regarding its criminal investigation into the dissemination of the surreptitious recording of Plaintiff engaged in sexual relations with Heather Clem.

In or about March 2014, Mr. Harder had approximately one to two telephone conversations with Jason R. Shearn of the FBI regarding the criminal investigation into the

dissemination of the surreptitious recording of Plaintiff engaged in sexual relations with Heather Clem, and the issue of disclosure of communications regarding that investigation.

In or about March 2014, Mr. Harder had approximately one to two telephone conversations with Sara Sweeney of the U.S. Attorney's Office for the Middle District of Florida regarding the criminal investigation into the dissemination of the surreptitious recording of Plaintiff engaged in sexual relations with Heather Clem, and the issue of disclosure of communications regarding that investigation.

In or about March 2014, Ken Turkel had approximately two to three telephone conversations with Sara Sweeney and Robert A. Mosakowski of the U.S. Attorney's Office for the Middle District of Florida regarding the issue of disclosure of communications regarding that investigation.

On or about December 13, 2012, Plaintiff and David Houston met with FBI agents Jason R. Shearn and Charlotte F. Braziel at the FBI office in Tampa, Florida to discuss logistical details for their in-person meeting with Keith Davidson and his client, which was scheduled for the following day.

On or about December 14, 2012, Plaintiff, Mr. Houston, several FBI agents, including agents Jason R. Shearn and Charlotte F. Braziel, and a polygrapher named "Jim" met in Mr. Houston's hotel room at the Sand Pearl Hotel in Clearwater Beach, Florida, prior to the meeting that was scheduled, with the intended attendees being: Plaintiff, Mr. Houston, Jim, Keith Davidson, and his client. Mr. Houston believes there were several FBI agents stationed in the lobby of the hotel as well. Upon the arrival at the Sand Pearl Hotel of Mr. Davidson and a female who appeared to be either his client or client's representative, the FBI agents moved to an adjacent hotel room. Plaintiff, Mr. Houston, Jim, Mr. Davidson, and his client or client's

representative had a meeting in Mr. Houston's hotel room. At the conclusion of the meeting, the FBI agents entered Mr. Houston's hotel room and detained Mr. Davidson and his client or client's representative.

Mr. Houston seems to recall that there may have been one to two phone calls with FBI agents immediately following the December 14, 2012 meeting regarding scheduling a time for Mr. Houston to return to Tampa, Florida as a follow-up to the December 14, 2012 meeting. Mr. Houston does not recall any such in-person follow-up meeting taking place.

DATED: May 16, 2014

/s/ Charles J. Harder

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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 via the e-portal system this ____ day of May, 2014 to the following:

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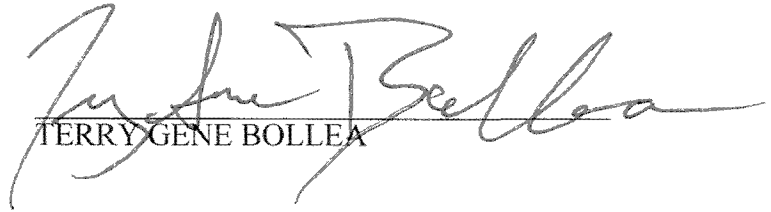
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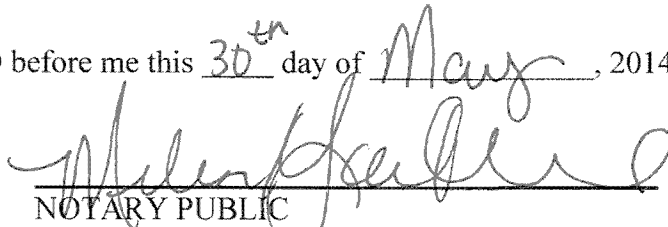
VERIFICATION


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 Confidential Second Supplemental Responses to Interrogatory 9 Propounded by A.J. Daulerio herein are true and correct to the best of his/her knowledge and belief.

SWORN TO AND SUBSCRIBED before me this 30th day of May, 2014.


NOTARY PUBLIC

Melissia Gauthreaux
Printed Name of Notary Public

My Commission Expires:

5-12-17

MELISSIA K. GAUTHREAUX
Notary Public, State of Florida
My Comm. Expires May 12, 2017
No. FF 16921