

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.

DEFENDANT GAWKER MEDIA, LLC'S
REQUEST FOR ADMISSION TO PLAINTIFF

Pursuant to Rule 1.370 of the Florida Rules of Civil Procedure, defendant Gawker Media, LLC ("Gawker"), by its undersigned counsel, hereby requests that plaintiff Terry Gene Bollea admit the matters set forth below within thirty (30) days after service of this request.

Definitions

1. "You" and "your" mean the plaintiff Terry Gene Bollea.
2. "Terry Bollea" means Terry Gene Bollea (professionally known as "Hulk Hogan").
3. "Hulk Hogan" means the character played by Terry Bollea.
4. The words "and" and "or" also have the meaning "and/or."
5. "Bubba Clem" means Bubba the Love Sponge Clem.
6. "Mike Walters" means Mike Walters, the employee of TMZ.
7. "Dixie Carter" means Dixie Carter, the President of TNA Wrestling.

Requests for Production

Request No. 1: Admit that you do not possess any text messages or iMessages you received from or sent to Bubba Clem in March 2012.

Request No. 2: Admit that you do not possess any text messages or iMessages you received from or sent to Bubba Clem in April 2012.

Request No. 3: Admit that you do not possess any text messages or iMessages you received from or sent to Bubba Clem in May 2012.

Request No. 4: Admit that you do not possess any text messages or iMessages you received from or sent to Bubba Clem in October 2012, other than the messages you have produced to date in the above-captioned litigation.

Request No. 5: Admit that you do not possess any text messages or iMessages you received from or sent to 813-260-0299 in March 2012.

Request No. 6: Admit that you do not possess any text messages or iMessages you received from or sent to 813-260-0299 in April 2012.

Request No. 7: Admit that you do not possess any text messages or iMessages you received from or sent to 813-260-0299 in May 2012.

Request No. 8: Admit that you do not possess any text messages or iMessages you received from or sent to 813-260-0299 in October 2012, other than the messages you have produced to date in the above-captioned litigation.

Request No. 9: Admit that you do not possess any text messages or iMessages you received from or sent to Mike Walters in March 2012.

Request No. 10: Admit that you do not possess any text messages or iMessages you received from or sent to Mike Walters in April 2012.

Request No. 11: Admit that you do not possess any text messages or iMessages you received from or sent to Mike Walters in May 2012.

Request No. 12: Admit that you do not possess any text messages or iMessages you received from or sent to Mike Walters in October 2012.

Request No. 13: Admit that you do not possess any text messages or iMessages you received from or sent to Dixie Carter in March 2012.

Request No. 14: Admit that you do not possess any text messages or iMessages you received from or sent to Dixie Carter in April 2012.

Request No. 15: Admit that you do not possess any text messages or iMessages you received from or sent to Dixie Carter in October 2012.

Request No. 16: Admit that Hogan's Beach opened on or about December 31, 2012.

Request No. 17: Admit that by the end of September 2012, you were aware that Hogan's Beach would be opening within six months.

Request No. 18: Admit that Hogan's Beach Shop opened in or about October 2012.

Request No. 19: Admit that by the end of September 2012, you were aware that Hogan's Beach Shop would be opening in October 2012.

Request No. 20: Admit that every document you produced in the above-captioned litigation is authentic.

Request No. 21: Admit that every document bearing a BOLLEA bates-label produced in the above-captioned litigation is authentic.

Respectfully submitted,

THOMAS & LOCICERO PL

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 5th day of March, 2015, I caused a true and correct copy of the foregoing to be served electronically upon the following counsel of record at their respective email addresses via the Florida Courts E-Filing Portal:

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