

# 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  
DEFENDANT NICK DENTON'S THIRD SET OF INTERROGATORIES**

**PROPOUNDING PARTY: Defendant NICK DENTON**

**RESPONDING PARTY: Plaintiff TERRY GENE BOLLEA**

**SET NO.: THREE**

Plaintiff TERRY GENE BOLLEA (herein "Responding Party") hereby responds to  
defendant NICK DENTON's (herein "Propounding Party") third set of interrogatories 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.

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.

### **RESPONSES TO INTERROGATORIES**

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 NO. 18**

Explain in detail how you calculate 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, and state what you calculate the reasonable value of such a sex tape to be.

**RESPONSE TO INTERROGATORY NO. 18**

Responding Party incorporates by this reference each and every general objection as though fully set forth herein. 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 further objects to this Interrogatory on the ground that it seeks private, confidential, and/or proprietary information or trade secrets. Responding Party objects to this Interrogatory to the extent that it is made to cause annoyance, oppression, and undue burden and expense to Responding Party. Responding Party objects to this Interrogatory 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 Interrogatory to the extent that it seeks information that is not relevant to the claims, defenses, or subject matter of the instant action, nor reasonably calculated to lead to the discovery of admissible evidence. Responding Party objects to this Interrogatory on the ground that it is compound and/or contains subparts.

Without waiving or otherwise limiting the above objections, Responding Party responds as follows: Responding Party objects to this Interrogatory 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. A more complete response to this Interrogatory will be the subject of expert discovery and will be provided to Propounding

Party in accordance with the order setting forth expert discovery deadlines, subject to any stipulated extensions entered before that time. Discovery as to Responding Party's damage theories is ongoing and as such, any details in addition to those already provided in response to Interrogatory No. 12 propounded by defendant Gawker Media, LLC are protected by the attorney-client privilege and work product doctrines. Responding Party reserves the right to alter or modify this response, and his response to Interrogatory No. 12, as additional information is learned through his investigation and discovery into the underlying facts.

**INTERROGATORY NO. 19**

Explain in detail how you calculate the reasonable value of the Video Excerpts, and state what you calculate the reasonable value of the Video Excerpts to be.

**RESPONSE TO INTERROGATORY NO. 19**

Responding Party incorporates by this reference each and every general objection as though fully set forth herein. 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 further objects to this Interrogatory on the ground that it seeks private, confidential, and/or proprietary information or trade secrets. Responding Party objects to this Interrogatory to the extent that it is made to cause annoyance, oppression, and undue burden and expense to Responding Party. Responding Party objects to this Interrogatory 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 Interrogatory to the extent that it seeks information that is not relevant to the claims, defenses, or subject matter of the instant action, nor reasonably calculated to lead to the discovery of

admissible evidence. Responding Party objects to this Interrogatory on the ground that it assumes facts not in evidence. Responding Party objects to this Interrogatory on the ground that it is compound and/or contains subparts.

Without waiving or otherwise limiting the above objections, Responding Party responds as follows: Responding Party objects to this Interrogatory 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. A more complete response to this Interrogatory will be the subject of expert discovery and will be provided to Propounding Party in accordance with the order setting forth expert discovery deadlines, subject to any stipulated extensions entered before that time. Discovery as to Responding Party's damage theories is ongoing and as such, any details in addition to those already provided in response to Interrogatory No. 12 propounded by defendant Gawker Media, LLC are protected by the attorney-client privilege and work product doctrines. Responding Party reserves the right to alter or modify this response, and his response to Interrogatory No. 12, as additional information is learned through his investigation and discovery into the underlying facts.

**INTERROGATORY NO. 20**

Explain in detail how you calculate the element of damages identified in the paragraph numbered 2 in your third supplemental response to Interrogatory No. 12 propounded by defendant Gawker Media, LLC, and state what value you calculate that element of damages to be. Paragraph numbered 2 states, in relevant part, "[t]he reasonable value of 5.35 million unique Internet users visiting the Gawker.com homepage and/or the webpage featuring the Hulk Hogan sex tape, and any other Gawker affiliated websites/webpages during the period of October 4, 2012, through April 25, 2013, because of the existence of the Hulk Hogan sex tape at

Gawker.com.”

**RESPONSE TO INTERROGATORY NO. 20**

Responding Party incorporates by this reference each and every general objection as though fully set forth herein. 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 further objects to this Interrogatory on the ground that it seeks private, confidential, and/or proprietary information or trade secrets. Responding Party objects to this Interrogatory to the extent that it is made to cause annoyance, oppression, and undue burden and expense to Responding Party. Responding Party objects to this Interrogatory 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 Interrogatory to the extent that it seeks information that is not relevant to the claims, defenses, or subject matter of the instant action, nor reasonably calculated to lead to the discovery of admissible evidence. Responding Party objects to this Interrogatory on the ground that it is compound and/or contains subparts.

Without waiving or otherwise limiting the above objections, Responding Party responds as follows: Responding Party objects to this Interrogatory 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. A more complete response to this Interrogatory will be the subject of expert discovery and will be provided to Propounding Party in accordance with the order setting forth expert discovery deadlines, subject to any stipulated extensions entered before that time. Discovery as to Responding Party’s damage

theories is ongoing and as such, any details in addition to those already provided in response to Interrogatory No. 12 propounded by defendant Gawker Media, LLC are protected by the attorney-client privilege and work product doctrines. Responding Party reserves the right to alter or modify this response, and his response to Interrogatory No. 12, as additional information is learned through his investigation and discovery into the underlying facts.

#### **INTERROGATORY NO. 21**

Explain in detail how you calculate the element of damages identified in the paragraph numbered 3 in your third supplemental response to Interrogatory No. 12 propounded by defendant Gawker Media, LLC, and state what value you calculate that element of damages to be. Paragraph numbered 3 states, in relevant part, “Gawker Media’s profits, and the profits of Gawker’s owners, managers and/or employees, resulting from the unlawful dissemination of the Hulk Hogan sex tape at issue and the accompanying narrative describing Hulk Hogan naked and having sex in a private place. To clarify, ‘profits’ as used herein includes, without limitation, any increase in profits of either Gawker.com and/or Gawker Media, LLC attributable, directly or indirectly, to the existence of the Hulk Hogan sex video at Gawker.com.”

#### **RESPONSE TO INTERROGATORY NO. 21**

Responding Party incorporates by this reference each and every general objection as though fully set forth herein. 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 further objects to this Interrogatory on the ground that it seeks private, confidential, and/or proprietary information or trade secrets. Responding Party objects to this Interrogatory to the extent that it is made to cause annoyance, oppression, and undue burden and expense to Responding Party. Responding Party objects to this Interrogatory



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 Interrogatory to the extent that it seeks information that is not relevant to the claims, defenses, or subject matter of the instant action, nor reasonably calculated to lead to the discovery of admissible evidence. Responding Party objects to this Interrogatory on the ground that it is compound and/or contains subparts.

Without waiving or otherwise limiting the above objections, Responding Party responds as follows: Responding Party objects to this Interrogatory 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. A more complete response to this Interrogatory will be the subject of expert discovery and will be provided to Propounding Party in accordance with the order setting forth expert discovery deadlines, subject to any stipulated extensions entered before that time. Discovery as to Responding Party's damage theories is ongoing and as such, any details in addition to those already provided in response to Interrogatory No. 12 propounded by defendant Gawker Media, LLC are protected by the attorney-client privilege and work product doctrines. Responding Party reserves the right to alter or modify this response, and his response to Interrogatory No. 12, as additional information is learned through his investigation and discovery into the underlying facts.

**INTERROGATORY NO. 22**

Identify the IT expert.

**RESPONSE TO INTERROGATORY NO. 22**

Responding Party incorporates by this reference each and every general objection as