

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
IN AND FOR PINELLAS COUNTY, FLORIDA

TERRY GENE BOLLEA professionally  
known as HULK HOGAN,

Case No. 12012447 CI-011

Plaintiff,

vs.

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'S MOTION TO EXTEND DISCOVERY DEADLINE  
AND SHORTEN RESPONSE DEADLINES  
FOR LIMITED PURPOSE OF FINANCIAL WORTH DISCOVERY**

Plaintiff Terry Gene Bollea, professionally known as "Hulk Hogan," moves for an extension of the discovery cut-off until May 29, 2015, for the limited purpose of conducting financial worth discovery concerning Defendants Gawker Media, LLC ("Gawker"), Nick Denton ("Denton") and A.J. Daulerio ("Daulerio") (together, "Defendants"), to shorten the response times for interrogatories and requests for production directed at Defendants' financial worth to fourteen (14) days, and for these Defendants to make themselves available for depositions on their financial worth, and states in support as follows:

1. Concurrently herewith, Mr. Bollea has filed a Motion for Leave to Amend to Assert a Claim for Punitive Damages against Defendants ("Punitive Damages Motion"). Mr.

Bollea waited to finalize the Punitive Damages Motion until the completion of recent depositions of certain Gawker witnesses.

2. Mr. Bollea has noticed a hearing on the Punitive Damages Motion for April 22, 2015.

3. In the event Mr. Bollea is permitted to assert a claim for punitive damages, he is entitled to conduct discovery concerning the financial worth of Defendants Gawker, Denton and Daulerio. See § 768.72, Fla. Stat. (“No discovery of financial worth shall proceed until after the pleading concerning punitive damages is permitted.”).

4. The February 18, 2015 Order Setting Pre-Trial Conference and Jury Trial sets the fact discovery cut-off as April 10, 2015.

5. Accordingly, Mr. Bollea respectfully requests an extension of the fact discovery cut-off until May 29, 2015 for the limited purpose of conducting financial worth discovery regarding Defendants. Mr. Bollea also seeks to shorten the response times for interrogatories and requests for production directed to Defendants’ financial worth to fourteen (14) days. Mr. Bollea further requests that Defendants be required to make themselves available for depositions (limited to the subject matter of their financial worth) to allow for the completion of the financial worth discovery by May 29, 2015.

**I. CONCLUSION**

For the foregoing reasons, Mr. Bollea respectfully requests that, in the event the Court grants his Punitive Damages Motion, he also be granted an extension of the fact discovery cut-off until May 29, 2015 for the limited purpose of conducting financial worth discovery, that response times for financial worth discovery be shortened to fourteen (14) days and that Defendants be required to make themselves available for depositions limited to the subject

matter of their financial worth, as well as granting such other and further relief as the Court deems just and appropriate.

Respectfully submitted,

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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 via the e-portal system this 3rd day of April, 2015 to the following:

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