

CONFIDENTIAL
EXHIBIT 111-C

to the

**SUPPLEMENTAL CONFIDENTIAL AFFIDAVIT OF RACHEL E. FUGATE IN
SUPPORT OF THE PUBLISHER DEFENDANTS' MOTION FOR SUMMARY
JUDGMENT**

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 SUPPLEMENTAL
RESPONSES TO INTERROGATORY NOS. 9 AND 10 PROPOUNDED BY
GAWKER MEDIA, LLC**

PROPOUNDING PARTY: Defendant GAWKER MEDIA, LLC

RESPONDING PARTY: Plaintiff TERRY GENE BOLLEA

SET NO.: ONE

**THESE SUPPLEMENTAL RESPONSES ARE DESIGNATED "CONFIDENTIAL"
PURSUANT TO THE PARTIES' PROTECTIVE ORDER. DISSEMINATION IS
PROHIBITED EXCEPT AS PROVIDED IN THAT ORDER.**

Plaintiff TERRY GENE BOLLEA (herein "Responding Party") hereby supplements his
response to Interrogatory Nos. 9 and 10 propounded by defendant GAWKER MEDIA, LLC
(herein "Propounding Party") as follows:

PRELIMINARY STATEMENT

Responding Party responds to the Interrogatories subject to, without intending to waive,

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:

Identify any and all times you had Sexual Relations with Heather Clem during the Relevant Time Period, stating for each time the date, approximate time, and location of the occurrence.

RESPONSE TO INTERROGATORY 9:

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 objects to this Interrogatory on the ground that the Interrogatory is overbroad and burdensome to the extent that it requires Responding Party to determine whether sex acts occurred which have nothing to do with the claims in this case. Responding Party objects to this Interrogatory on the ground that it is so broad on its face that it requires production of irrelevant information. 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 to the extent that it is also repetitive and covered by other discovery requests. Responding Party objects to this Interrogatory to the extent that it seeks to invade Responding Party's privacy and the privacy of Heather Clem.

CONFIDENTIAL SUPPLEMENTAL RESPONSE TO INTERROGATORY 9:

Subject to and without waiver of the foregoing objections, Responding Party does not remember the exact number of sexual encounters with Heather Clem. To the best of Responding Party's recollection, there were at least two, and possibly three, sexual encounters with Heather Clem in her private bedroom at the Clems' residence, and one brief sexual encounter with Heather Clem at the radio station of Todd Clem's radio program. To the best of Responding Party's recollection, these encounters all occurred in approximately late spring/early summer of 2007, after Responding Party had separated from his wife.

INTERROGATORY 10:

Identify any and all times you discussed having Sexual Relations with Heather Clem with her husband, Todd Alan Clem, during the Relevant Time Period, stating for each time the date, approximate time, location and substance of the discussion.

RESPONSE TO INTERROGATORY 10:

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 objects to this Interrogatory on the ground that the Interrogatory is overbroad and burdensome, in that whether or not this topic was discussed with any frequency or any specifics of such discussions other than whether such an encounter would be recorded and/or disseminated are irrelevant to the case. Responding Party objects to this Interrogatory on the ground that it is so broad on its face that it requires production of irrelevant information. 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

a recording of the encounter to anyone.

DATED: February 21, 2014

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via e-mail this 21st day of February, 2014 to the following:

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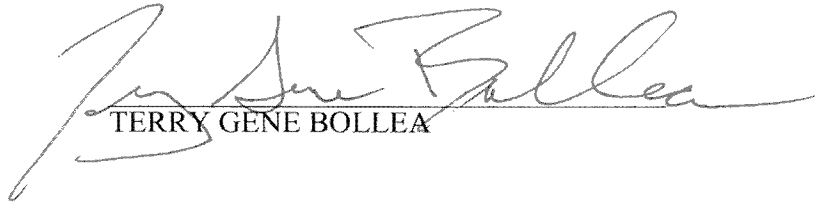
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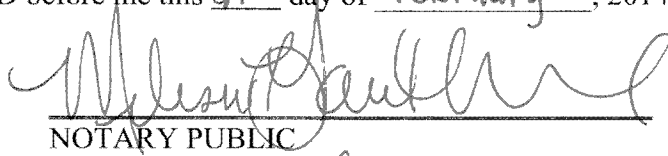
VERIFICATION


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 Supplemental Responses to Interrogatory Nos. 9 and 10 Propounded by Gawker Media, LLC herein are true and correct to the best of his/her knowledge and belief.

SWORN TO AND SUBSCRIBED before me this 21st day of February, 2014.


NOTARY PUBLIC

Melissia K. Gauthreaux
Printed Name of Notary Public

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

My Commission Expires:

5-12-17