

# EXHIBIT 1

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  
GAWKER MEDIA, LLC'S INTERROGATORIES**

**PROPOUNDING PARTY:** Defendant GAWKER MEDIA, LLC

**RESPONDING PARTY:** Plaintiff TERRY GENE BOLLEA

**SET NO.:** ONE

Plaintiff TERRY GENE BOLLEA (herein "Responding Party") hereby responds to Interrogatories (Set One) 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, 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.

Clem that the sexual activity would be recorded or that a recording of such activity would be disseminated to the public.

**INTERROGATORY 19:**

Identify all facts supporting your claim in paragraph 31 of the Complaint that you have suffered, and continue to suffer, “tremendous emotional distress” as a result of Defendants’ alleged actions, and identify all documents relating to such claim, and all persons having knowledge of the facts relating to such claim.

**RESPONSE TO INTERROGATORY 19:**

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 to the extent that it seeks to invade Responding Party’s privacy and the privacy of third parties. Responding Party further objects to this Interrogatory on the ground that it has improper subparts. Responding Party further objects to this Interrogatory on the ground that the emotional distress claim asserted in this litigation is a “garden variety” emotional distress claim, *i.e.*, a claim based on the fact that Gawker Media’s conduct is so outrageous to an ordinary person that it was almost certain to cause emotional distress. The assertion of such a claim does not require or permit discovery into Responding Party’s intimate medical and/or mental health history. Without waiver of the foregoing, Responding Party incorporates herein the statements in the Declaration of Terry Bollea filed in Florida state court in support of his Motion for Temporary Injunction.

**INTERROGATORY 20:**

Identify any and all facts supporting your claim in paragraph 33 of the Complaint that the commercial value of your “name, image, identity and persona has been, and continues to be,

substantially diminished” by defendants’ actions, and identify all documents relating to such claim, and all persons having knowledge of the facts relating to such claim.


**RESPONSE TO INTERROGATORY 20:**

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 to the extent that it seeks to invade Responding Party’s privacy and the privacy of third parties.

Without waiver of the foregoing, Responding Party responds as follows: Discovery is continuing, and Gawker Media’s actions were by their very nature likely to harm the value of Responding Party’s name, image, identity, and/or persona. Additionally, Responding Party believes he may have lost the Rent-A-Center endorsement contract and work from World Wrestling Entertainment due to the publication of the Sex Tape. Former fans have also contacted Responding Party and indicated that they were no longer his fans due to the publication of the Sex Tape. However, Responding Party has not yet calculated the extent of such harm or the amount of any damages suffered.

DATED: August 21, 2013



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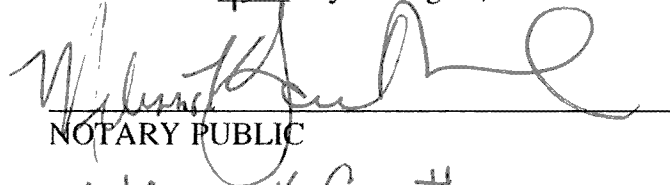
**VERIFICATION**

  
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 Responses to Gawker Media, LLC's Interrogatories herein are true and correct to the best of his/her knowledge and belief.

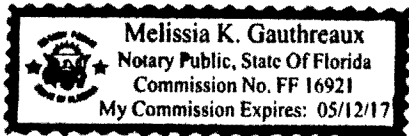
SWORN TO AND SUBSCRIBED before me this <sup>22<sup>nd</sup></sup> day of August, 2013.

  
NOTARY PUBLIC

Melissia K. Gauthreaux  
Printed Name of Notary Public

My Commission Expires:

5/12/17



**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via U.S. First Class Mail this 21 day of August, 2013 to the following:

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