

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.

**PLAINTIFF TERRY GENE BOLLEA'S FOURTH SUPPLEMENTAL RESPONSE TO
INTERROGATORY NO. 12 PROPOUNDED BY GAWKER MEDIA, LLC**

PROPOUNDING PARTY: Defendant GAWKER MEDIA, LLC

RESPONDING PARTY: Plaintiff TERRY GENE BOLLEA

SET NO.: ONE

Plaintiff TERRY GENE BOLLEA (herein "Responding Party") hereby supplements his response to Interrogatory No. 12 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.

These responses are based upon a diligent investigation undertaken by Responding Party and its counsel since the service of these Interrogatories. These responses reflect only Responding Party's current understanding, belief and knowledge regarding the matters about which inquiry was made. Responding Party has not yet had sufficient opportunity to depose or interview all persons who may have knowledge of relevant facts, or to discover or otherwise obtain and review all documents which may have some bearing on this case.

Consequently, there may exist further information, documents and persons with knowledge relevant to these Interrogatories of which Responding Party is not currently aware. As this action proceeds, Responding Party anticipates that further facts, witnesses and documents may be discovered or identified. Without in any way obligating it to do so, Responding Party reserves the right to offer further or different evidence or information at trial or at any pretrial proceeding. These responses are not in any way to be deemed an admission or representation that there are no further facts, documents or witnesses having knowledge relevant to the subject matter of these Interrogatories.

GENERAL OBJECTIONS

1. The following Responses, and each of them, are based upon information and writings presently available to, and located by, Responding Party and its attorneys. Responding Party has not completed an investigation of the facts or discovery proceedings in this case and has not completed its preparation for trial. The following Responses, and each of them, are made without prejudice to Responding Party's right to produce evidence based on subsequently discovered facts or documents, and to offer such facts or documents in evidence at the time of trial. The fact that Responding Party has responded to an Interrogatory should not be taken as an admission that Responding Party accepts or admits the existence of any facts set forth or

assumed by such Interrogatory, or that such Response constitutes admissible evidence. The following Responses, and each of them, are made without prejudice to the rights of Responding Party to introduce evidence of any subsequently discovered facts or documents which Responding Party may later obtain, discover or recall.

2. The documents and information which could or would form the basis of responses to the instant Interrogatories, in whole or in part, are still in the process of being identified by Responding Party, and all such relevant documents and information have not yet been identified, examined or produced. In addition, the significance of documents and information which may now be in the possession of Responding Party may only become apparent upon further discovery and review of those documents and information in the context of other documents which have not yet been identified or obtained in the context of later testimony or discovery which may establish their relevance.

3. These Responses are made, and any and all documents are being produced, solely for the purposes of this litigation. Any documents supplied in response to the Requests are being supplied by Responding Party subject to all objections as to competence, relevance, materiality, propriety and admissibility, and to any and all other objections on any ground that would require the exclusion of any document or portion thereof, if such document were offered in evidence in Court, all of which objections and ground are expressly reserved and may be interposed at the time of trial.

4. Responding Party, accordingly, reserves the right to alter or modify any and all Responses set forth herein as additional facts may be ascertained, documents discovered, analyses made, witnesses identified, additional parties identified, legal research completed, and contentions made or expanded.

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.

FOURTH SUPPLEMENTAL RESPONSE TO INTERROGATORY 12:

Without waiver of the objections previously stated, Responding Party further responds as follows:

Responding Party presently intends to seek damages at trial, as follows:

1. The reasonable value of a publicly released sex tape featuring Hulk Hogan (Terry Bollea), released on the Internet with viewership of approximately 2.5 million unique viewers during the period of October 4, 2012, through April 25, 2013, at Gawker.com, and approximately

4.46 million additional viewers at other websites that published the same video edited by Gawker Media, LLC and posted originally at Gawker.com, totaling approximately 6.96 million unique viewers.

A standard price to access and view a publicly released and authorized/licensed celebrity sex tape on the Internet is approximately \$4.95 per unique view, as provided in the concurrently-served expert designations. However, because the unauthorized video of Hulk Hogan (Terry Bollea) was published without his knowledge or consent, Mr. Bollea believes his damages exceed the standard price per unique view charged for authorized/licensed sex tapes. Based on the standard price to access and view a publicly released and authorized/licensed celebrity sex tape on the Internet, Mr. Bollea believes that a minimum of \$15 per view, for each of the 6.96 million unique viewers, is a fair and reasonable amount Defendants should have to pay for their unauthorized publication.

2. The reasonable value of 5.35 million unique Internet users visiting the Gawker.com homepage and/or the webpage featuring the Hulk Hogan (Terry Bollea) 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 (Terry Bollea) sex tape at Gawker.com. To clarify, “reasonable value” as used herein includes, without limitation, any increase in the value of Gawker.com and/or Gawker Media, LLC attributable, directly or indirectly, to the existence of the Hulk Hogan (Terry Bollea) sex video at Gawker.com.

The increase in value of Gawker.com as a result of Gawker publishing the sex video is between \$4,995,000 and \$15,445,000, which will be supported by expert testimony, as provided in the concurrently-served expert designations.

3. Disgorgement of Gawker Media's profits, and the profits of Gawker's owners, managers and/or employees, resulting from the unlawful dissemination of the Hulk Hogan (Terry Bollea) sex tape at issue. To clarify, "profits" as used herein includes, without limitation, any increase in profits of Gawker.com and/or Gawker Media, LLC attributable, directly or indirectly, to the existence of the Hulk Hogan (Terry Bollea) sex video posted for approximately six months at Gawker.com.

4. The reasonable value of the infringement of Terry Bollea a/k/a Hulk Hogan's rights resulting from Gawker Media's posting of a sex tape featuring him, which included graphic video and audio footage (which Gawker had no right to post, and which infringed rights of great personal value to Mr. Bollea), with viewership of approximately 2.5 million unique viewers at Gawker.com, and 4.46 million more viewers at other sites that published the same Gawker Media, LLC-edited video that was published originally at Gawker.com, totaling approximately 6.96 million unique viewers.

A standard price to access and view a publicly released and authorized/licensed celebrity sex tape on the Internet is approximately \$4.95 per unique view, as provided in the concurrently-served expert designations. However, because the unauthorized video of Hulk Hogan (Terry Bollea) was published without his knowledge or consent, Mr. Bollea believes his damages exceed the standard price per unique view charged for authorized/licensed sex tapes. Based on the standard price to access and view a publicly released and authorized/licensed celebrity sex tape on the Internet, Mr. Bollea believes that a minimum of \$15 per view, for each of the 6.96 million unique viewers, is a fair and reasonable amount Defendants should have to pay for their infringement of his rights.

5. General emotional distress damages sufficient to compensate for the emotional distress, embarrassment, humiliation, and mental anguish that would naturally and foreseeably result from being the subject of a publicly released sex tape on the Internet, watched by approximately 6.96 million people (distress that did not involve Plaintiff seeking medical attention or treatment), the amount of which will be determined by the jury pursuant to Florida law.

6. Punitive damages, based on the intentional and outrageous nature of Defendants' conduct, in an amount to be determined by the jury as appropriate to punish and deter Defendants' unlawful conduct, pursuant to Florida law.

Responding Party also seeks costs (including reasonable attorneys' fees) and a permanent injunction as described in the operative Complaint.

Responding Party has designated initial expert witnesses for purposes of testifying at trial in this action and reserves the right to present additional information by way of rebuttal expert testimony, rebuttal expert reports and/or documents relied upon by experts in presenting their testimony and/or their reports.

Responding Party's investigation and discovery are continuing, and Responding Party reserves the right to alter or modify this response as additional information is learned through his investigation and discovery into the underlying facts.

DATED: March 6, 2015

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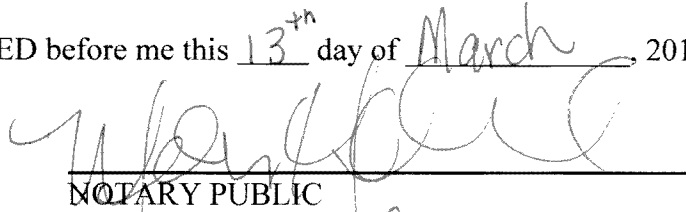
VERIFICATION


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 Fourth Supplemental Response to Interrogatory No. 12 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 13th day of March, 2015.



NOTARY PUBLIC

Melissa Gauthreaux
Printed Name of Notary Public

My Commission Expires:

5-12-17

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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by e-mail this 6th day of March, 2015 to the following:

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