

EXHIBIT 13

to the

PUBLISHER DEFENDANTS' MOTION IN LIMINE ON EVIDENCE
RELATING TO PLAINTIFF'S ADMISSION THAT HE BELIEVED
THE SEX TAPE(S) SHOWED HIM MAKING STATEMENTS THAT
HAVE BEEN MARKED AS CONFIDENTIAL

FILED

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

12 OCT 15 PM 3:42
MIDDLE DISTRICT OF FLORIDA
TAMPA, FLORIDA

TERRY GENE BOLLEA professionally
known as HULK HOGAN,

Plaintiff,

v.

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, BLOGWIRE HUNGARY
SZELLEMI ALKOTAST HASZNOSITO
KFT aka GAWKER MEDIA

Defendants.

Case No. 8:12CV2348-27TBM

**COMPLAINT AND DEMAND FOR
JURY TRIAL WITH INJUNCTIVE RELIEF SOUGHT**

Plaintiff Terry Gene Bollea (“Plaintiff” or “Bollea”), professionally known as “Hulk Hogan,” sues defendants 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, Blogwire Hungary Szellemi Alkotast Hasznosito KFT aka Gawker Media (collectively, “Defendants”) and alleges as follows:

TDA-13727
#350

PRAYER FOR RELIEF

WHEREFORE, plaintiff Terry Gene Bollea prays for judgment against defendants 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, Blogwire Hungary Szellemi Alkotast Hasznosito KFT aka Gawker Media, and each of them, jointly and severally, as follows:

AS TO THE FIRST THROUGH FOURTH CAUSES OF ACTION

1. For an award of general and special damages in an amount not less than One Hundred Million Dollars (\$100,000,000.00), together with interest thereon at the maximum legal rate;

2. For exemplary and punitive damages in an amount appropriate to punish and set an example of Defendants, and to deter such conduct in the future, the exact amount of such damages is subject to proof at trial;

AS TO ALL CAUSES OF ACTION

3. For a preliminary and permanent injunction against Defendants, and all persons acting on their behalf or under their control, from any and all activity that would cause or have the effect of distributing, disseminating, publishing, displaying, posting for view or access on or through the Internet or any other manner or media outlet, broadcasting, transferring, licensing, selling, offering to sell or license, or otherwise using, exploiting or attempting to exploit, the Video or any portions or content thereof or any copies thereof,

including without limitation the Video Excerpts, in any and all formats and media, including all electronic and physical media;

4. For a Judgment and Order transferring to Plaintiff any and all of Defendants' right, title and interest in and to the Video, and all portions and content thereof, including without limitation the Video Excerpts,;

5. For a Judgment and Order requiring the delivery to Plaintiff all copies of the Video, and all portions and content thereof, including without limitation the Video Excerpts, in all formats and all forms of media, including electronic and physical media, within Defendants' possession, custody or control, including without limitation turning over to Plaintiff any and all storage devices (such as CDs, DVDs, hard drives, flash drives, tapes, and disks) containing same;

6. For a Judgment and Order requiring Defendants to turn over to Plaintiff all information pertaining to the Video and Video Excerpts, including without limitation, all activity by all persons and entities related to the creation, storage, transportation, editing, distributing, disseminating, publishing, displaying, posting for view or access on or through the Internet or any other manner or media outlet, broadcasting, transferring, licensing, selling, offering to sell or license, or otherwise using, exploiting or attempting to exploit, the Video or any portions or content thereof or any copies thereof, including without limitation the Video Excerpts, in any and all formats and media, including all electronic and physical media.

7. For a constructive trust to be placed upon Defendants and all persons acting on their behalf or under their direction or control, as to all revenues and profits received by

any such individuals, including Defendants, to be held for the benefit of Plaintiff, and to be disgorged in their entirety to Plaintiff.

8. For such other and further relief as to this court may deem and proper.

DEMAND FOR JURY TRIAL

Pursuant to Fed.R.Civ.P. Rule 38 and the Seventh Amendment to the United States Constitution, plaintiff Terry Gene Bollea hereby demands a trial by jury on all issues so triable.

DATED: October 15, 2012

Respectfully Submitted,


/s/ E. Colin Thompson

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DATED: October 15, 2012

/s/ Charles J. Harder

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