

EXHIBIT 5

to the

**PUBLISHER DEFENDANTS'
OPPOSITION TO PLAINTIFF'S MOTION IN LIMINE NO. 21
TO EXCLUDE TESTIMONY OF GAWKER WITNESSES ON
ISSUES ABOUT WHICH THEY LACK PERSONAL KNOWLEDGE**

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

TERRY GENE BOLLEA professionally
known as HULK HOGAN,

Plaintiff,

Case No.: 12012447-CI-011

vs.

HEATHER CLEM; GAWKER MEDIA,
LLC aka GAWKER MEDIA; et al.,

Defendants.

**DEFENDANT GAWKER MEDIA, LLC'S RESPONSES
TO PLAINTIFF'S FIRST SET OF INTERROGATORIES**

Pursuant to Florida Rule of Civil Procedure 1.340, Defendant Gawker Media, LLC ("Gawker") hereby provides these responses to Plaintiff's First Set of Interrogatories dated May 21, 2013 ("Plaintiff's Interrogatories").

DEFINITIONS

1. The "Video" means the video and audio footage depicting Mr. Bollea that he claims was made without his consent in or about 2006 at issue in this lawsuit.
2. The "Gawker Story" means the story entitled "Even For a Minute, Watching Hulk Hogan Have Sex on a Canopy Bed is Not Safe For Work, But Watch It Anyway" published on www.gawker.com on or about October 4, 2012.
3. The "Excerpts" means the video file that was posted in connection with the Gawker Story, consisting of 101 seconds of footage excerpted from the Video.

Pursuant to Florida Rule 1.340(c), Gawker further refers Plaintiff to the documents being produced in response to Plaintiff's Requests for Production of Documents, including without limitation persons identified therein.

INTERROGATORY NO. 3: State all facts regarding the web traffic, including the number of page views and unique viewers (first time visitors), of the Webpage since it was posted on or about October 4, 2012.

RESPONSE: Gawker objects to this Interrogatory because it is overly broad and unduly burdensome in that it seeks "all facts" concerning the web traffic for the Webpage. Subject to and without waiving the foregoing objection, Gawker responds to this interrogatory as follows: Pursuant to Florida Rule 1.340(c), Gawker refers Plaintiff to its response to Plaintiff's Document Request No. 13 and the documents to be produced in connection therewith.

INTERROGATORY NO. 4: State all facts regarding the advertising revenue received by Gawker for advertisements on the Webpage, including without limitation the total advertising revenue received and the cost per impression of each advertisement, from the date of posting on or about October 4, 2012.

RESPONSE: Gawker did not post any advertising on the Webpage, and thus did not receive any revenue in connection with advertising on the Webpage.

INTERROGATORY NO. 5: State all facts regarding the making, editing, subtitling, dissemination, transmission, distribution, publication, sale and/or offering for sale of the Video, including without limitation, the name, company, title, all addresses and all telephone numbers of each person who was involved in such activities, and the specific involvement that each such person had in connection with such activities.

RFA 20	This Request was denied for the reasons stated in Gawker's response to it.
RFA 21	This Request was denied for the reasons stated in Gawker's response to it.
RFA 22	Gawker incorporates by reference its Response to Plaintiff's Interrogatory No. 6.

Dated: July 25, 2013

THOMAS & LOCICERO PL

By: /s/ Gregg D. Thomas

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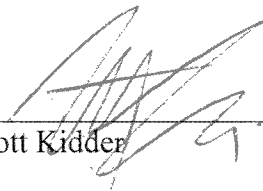
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Counsel for Defendant Gawker Media, LLC

VERIFICATION

I, Scott Kidder, am the Vice President of Operations at Gawker Media, LLC (“Gawker”). I am authorized to submit this verification on Gawker’s behalf in connection with Defendant Gawker Media, LLC’s Responses to Plaintiff’s First Set of Interrogatories. I have read the foregoing responses and objections and verify that the facts set forth therein are true and correct to the best of my the knowledge, information, and belief.



Scott Kidder

STATE OF NEW YORK

COUNTY OF NEW YORK

The foregoing Verification of Scott Kidder was SWORN TO AND SUBSCRIBED before me this 25th day of July 2013.

Notary Public, State of New York

(Print, type, or stamp Commissioned name of Notary Public)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25th day of July 2013, I caused a true and correct copy of the foregoing to be served by email upon the following counsel of record:

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