

**EXHIBIT 4**  
**TO**  
**OPPOSITION TO PLAINTIFF'S MOTION TO COMPEL**  
**ADDITIONAL FINANCIAL WORTH DISCOVERY**

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'S REQUESTS FOR PRODUCTION OF DOCUMENTS  
CONCERNING NET WORTH  
TO DEFENDANT NICK DENTON**

Pursuant to Florida Rules of Civil Procedure 1.350, Plaintiff Terry Gene Bollea, professionally known as Hulk Hogan ("PLAINTIFF"), hereby requests that Defendant Nick Denton produce for inspection and copying each of the documents or categories of documents described hereafter at the law offices of Bajo Cuva Cohen & Turkel, P.A., 100 North Tampa Street, Suite 1900, Tampa, Florida 33602. Pursuant to the provisions of Florida Rule of Civil Procedure 1.350, you are required to produce the documents requested below, numbered 1 through 92 within thirty days from the certificate of service.

33. For the time period beginning January 1, 2011, to the time of the response to this Request, any DOCUMENTS RELATING TO or reflecting the existence or location of any pensions, profit sharing, annuities or trusts in which YOU have any interest.

34. For the time period beginning January 1, 2011, to the time of the response to this Request, any and all DOCUMENTS showing any and all ownership and/or other interests YOU hold, for yourself personally and/or on behalf of GAWKER, KINJA or GMGI, in real estate (including both ownership and leasehold interests), any interests in other businesses, and/or any other form of investment, including without limitation DOCUMENTS sufficient to show the fair value and/or fair market value or worth of any and all such interests.

35. All DOCUMENTS REFERRING or RELATING TO any real property leased to or from YOU (individually, jointly, or otherwise), for yourself personally and/or on behalf of GAWKER, KINJA or GMGI, during any part of the period of January 1, 2011 to the time of the response of this Request, including DOCUMENTS sufficient to show the terms of all such leases, the location of the property(ies), the amount of rent paid, the owner of the property(ies) and the duration of the lease(s).

36. DOCUMENTS sufficient to show any and all ownership interests YOU hold (individually, jointly, or otherwise, for yourself personally and/or on behalf of GAWKER, KINJA or GMGI) in any and all real property from January 1, 2011 to the time of the response to this Request, including but not limited to, copies of any and all titles and/or deeds regarding such real property, and all DOCUMENTS stating and/or estimating the fair value and/or fair market value of any and all such real property.

37. DOCUMENTS sufficient to show whether any real property owned by YOU (either individually, jointly, or otherwise, for yourself personally and/or on behalf of GAWKER,

42. Copies of all trusts in which YOU, yourself personally and/or on behalf of GAWKER, KINJA or GMGI, are or were the grantor, settlor, trustee, beneficiary or in which YOU have or had any interest, legal or equitable, at any time from January 1, 2011, until the time of the response to the Request.

43. Copies of any testamentary documents which may govern the disposition of YOUR assets upon YOUR demise including, without limitation, wills and testamentary trusts.

44. Copies of any prenuptial agreements to which YOU are a party.

45. Copies of any currency, stock certificates or other DOCUMENTS or items YOU keep in a safe or similar apparatus, regardless of the location of such safe or apparatus for yourself personally and/or on behalf of GAWKER, KINJA or GMGI.

46. All DOCUMENTS showing the source of funds YOU have used to pay any monthly expenses since January 1, 2011.

47. All DOCUMENTS showing any on-line auctions or other purchases or sales of any property valued at more than \$1,000 in which YOU have participated since 2011.

48. For the time period beginning January 1, 2011, to the time of the response to this Request, all DOCUMENTS REFERRING or RELATING TO the finances of GAWKER, including without limitation all articles (print media and/or online), emails, internal memos, monthly reports, financial reports and/or financial statements.

49. For the time period beginning January 1, 2011, to the time of the response to this Request, all DOCUMENTS REFERRING or RELATING TO the revenue streams and/or income of GAWKER, including without limitation all articles (print media and/or online), emails, internal memos, monthly reports, financial reports and/or financial statements.

91. DOCUMENTS sufficient to show all assets and/or activities of GAWKER that provided any benefit to YOU, KINJA and/or GMGI at any time from January 1, 2011 to present.

92. DOCUMENTS sufficient to show all assets and/or activities of GMGI that provided any benefit to YOU, KINJA and/or GAWKER at any time from January 1, 2011 to present.

DATED: May 1, 2015

/s/ Kenneth G. Turkel

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-and-

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