

# EXHIBIT 10

to the

**GAWKER DEFENDANTS' MOTION TO COMPEL  
PLAINTIFF TO PRODUCE IMPROPERLY WITHHELD DOCUMENTS**

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  
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS**

Plaintiff TERRY GENE BOLLEA (herein "Responding Party") hereby responds to  
Request for Production of Documents (Set One) propounded by defendant GAWKER MEDIA,  
LLC (herein "Propounding Party") as follows:

**PRELIMINARY STATEMENT**

Responding Party responds to the Requests for Production subject to, without waiver of,  
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 his counsel since the service of these Requests. These responses reflect only Responding

which you discussed the Video and/or the Gawker Story, including, but not limited to, documents referring or relating to the scheduling of such appearances.

**RESPONSE TO REQUEST 51:**

Responding Party objects to this Request to the extent that it seeks documents protected from disclosure by the attorney-client privilege and/or attorney work product doctrine.

Responding Party objects to this Request on the ground that the requested documents are not identified with reasonable particularity. Responding Party objects to this Request on the ground that it is vague and ambiguous.

**REQUEST 52:**

Any and all documents in any manner referring or relating to communications between you or anyone acting on your behalf and any law enforcement person or agency concerning any recording of you having sexual relations with Heather Clem, including without limitation any documents referring or relating to communications identified in Plaintiff's Response to A.J. Daulerio's Interrogatory No. 9.

**RESPONSE TO REQUEST 52:**

Responding Party objects to this Request to the extent that it seeks documents protected from disclosure by the attorney-client privilege and/or attorney work product doctrine.

Responding Party objects to this Request on the ground that the requested documents are not identified with reasonable particularity. Responding Party objects to this Request on the ground that the documents sought are not reasonably likely to lead to the discovery of admissible evidence. Responding Party objects to this Request on the ground that the Request is overbroad and burdensome in that it potentially sweeps within its scope documents of little relevance to the case. Responding Party objects to this Request on the ground that it is so broad on its face that it

requires production of irrelevant documents and information. Responding Party objects to this Request on the ground that it is vague and ambiguous. Responding Party further objects to this Request on the ground of the law enforcement investigation privilege, and on the grounds of privacy.

**REQUEST 53:**

Any and all documents in any manner relating to photographs published in April 2012, including at the website thedirty.com, that purported to be from a video recording of you having sexual relations with a woman later identified as Heather Clem.

**RESPONSE TO REQUEST 53:**

Responding Party objects to this Request to the extent that it seeks documents protected from disclosure by the attorney-client privilege and/or attorney work product doctrine. Responding Party objects to this Request on the ground that the requested documents are not identified with reasonable particularity. Responding Party further objects to this Request on the ground that it is not reasonably likely to lead to the discovery of admissible evidence, and on the ground of overbreadth. Responding Party further objects to this Request on the grounds that it is vague and ambiguous.

**REQUEST 54:**

All records from 2012 referring or relating to the cellular phone accounts and telephone landlines identified in Plaintiff's Response to A.J. Daulerio's Interrogatory No. 10, including without limitation monthly paper and/or online billing statements.

**RESPONSE TO REQUEST 54:**

Responding Party objects to this Request to the extent that it seeks documents protected from disclosure by the attorney-client privilege and/or attorney work product doctrine.

Responding Party objects to this Request on the ground that the requested documents are not identified with reasonable particularity. Responding Party objects to this Request on the ground that it is not reasonably likely to lead to the discovery of admissible evidence. Responding Party objects to this Request on the ground that the Request is overbroad and burdensome.

Responding Party objects to this Request on the ground that it is so broad on its face that it requires production of irrelevant documents and information. Responding Party objects to this Request on the ground that it is vague and ambiguous. Responding Party further objects to this Request on the ground of privacy.

DATED: January 21, 2014

Respectfully submitted,

/s/ Charles J. Harder, Esq.  
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