

EXHIBIT 11

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.

**PLAINTIFF TERRY GENE BOLLEA'S RESPONSES TO GAWKER MEDIA, LLC'S
FIFTH REQUEST FOR PRODUCTION OF DOCUMENTS**

Plaintiff TERRY GENE BOLLEA (herein "Responding Party") hereby responds to Request for Production of Documents (Set Five) ("Request" or "Requests") 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

REQUEST NO. 71

For each request for production of documents previously propounded to you by Gawker or any of the other defendants in this action, produce any responsive documents within your possession, custody, and control that have not previously been produced.

RESPONSE TO REQUEST NO. 71

Responding Party incorporates by this reference each and every general objection as though fully set forth herein. Responding Party objects to this Request to the extent that it seeks the production of documents protected from disclosure by the attorney-client privilege and/or attorney work product doctrine. Responding Party further objects to this Request on the ground that it seeks the production of documents containing private, confidential, and/or proprietary information or trade secrets. 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 to the extent it could be construed as requesting Responding Party to undertake the substantial expense of conducting a renewed search of the documents of numerous persons; such a search is unduly burdensome and unlikely to lead to the discovery of admissible evidence. Responding Party further objects to this Request to the extent that it does not seek the production of documents related to the underlying events at issue, but instead seeks the production of documents gathered by Responding Party's attorneys in preparation of their prosecution of this action; such documents are protected against discovery by privilege, including but not limited to the attorney client privilege and attorney work product doctrine. Responding Party further objects to this Request on each of the grounds previously asserted in connection with each of Propounding Party's prior requests for production, and incorporates such prior objections as if fully set forth herein in their entirety. Responding Party further objects

to this Request on the ground that it is overbroad and does not state with particularity the prior Requests which Propounding Party wishes for Responding Party to supplement.

REQUEST NO. 72

All text messages and iMessages sent to or received from Mike Walters in March, April, and October 2012.

RESPONSE TO REQUEST NO. 72

Responding Party incorporates by this reference each and every general objection as though fully set forth herein. Responding Party objects to this Request to the extent that it seeks the production of documents protected from disclosure by the attorney-client privilege and/or attorney work product doctrine. Responding Party further objects to this Request on the ground that it seeks the production of documents containing private, confidential, and/or proprietary information or trade secrets. 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 requested documents are unlimited as to scope.

Responding Party objects to this Request on the ground that the Request is overbroad, unduly burdensome, and harassing. Responding Party objects to this Request to the extent that it is made to cause annoyance, oppression, and undue burden and expense to Responding Party.

Responding Party further objects to this Request to the extent it is duplicative and/or identical of other discovery propounded and/or issued by Propounding Party or any other defendant in this case to which Responding Party has already objected and/or responded, and for which applicable motion to compel and/or any other deadlines have already expired. Responding Party further objects to this Request to the extent that it seeks documents that are not relevant to the claims, defenses, or subject matter of the instant action, nor reasonably calculated to lead to the

motion to compel and/or any other deadlines have already expired. Responding Party further objects to this Request to the extent that it seeks documents that are not relevant to the claims, defenses, or subject matter of the instant action, nor reasonably calculated to lead to the discovery of admissible evidence.

Without waiving or otherwise limiting the above objections, Responding Party responds as follows: Responding Party refers Propounding Party to the Exhibit provided in response to Defendant Nick Denton's First Set of Interrogatories and to correspondence sent on October 15, 2014, by Charles Harder to the court and counsel of record. Subject to the foregoing objections, Responding Party is presently unaware of any further responsive documents.

DATED: January 22, 2015

Charles J. Harder, Esq.
PHV No. 102333
Douglas E. Mirell, Esq.
PHV No. 109885
Sarah E. Luppen, Esq.
PHV No. 113729
HARDER MIRELL & ABRAMS LLP
1925 Century Park East, Suite 800
Los Angeles, CA 90067
Tel: (424) 203-1600
Fax: (424) 203-1601
Email: charder@hmafirm.com
Email: dmirell@hmafirm.com
Email: sluppen@hmafirm.com

-and-

/s/ Kenneth G. Turkel
Kenneth G. Turkel, Esq.
Florida Bar No. 867233
Christina K. Ramirez, Esq.
Florida Bar No. 954497
BAJO CUVA COHEN & TURKEL, P.A.
100 North Tampa Street, Suite 1900
Tampa, Florida 33602
Tel: (813) 443-2199
Fax: (813) 443-2193
Email: kturkel@bajocuva.com
Email: qramirez@bajocuva.com

Counsel for Plaintiff