

# EXHIBIT 9

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  
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

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. Responding Party objects to this Request on the ground that it is vague and ambiguous.

**REQUEST 3:**

Any and all documents in any manner related to the Video.

**RESPONSE TO REQUEST 3:**

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.

Without waiver of the foregoing, Responding Party responds as follows: To the extent non-privileged documents exist and are not equally available to Gawker Media, Responding Party will endeavor to collect and produce them within a reasonable period of time.

**REQUEST 4:**

Any and all documents in any manner related to any communications you had about the Video.

**RESPONSE TO REQUEST 4:**

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 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

**REQUEST 9:**

Any and all documents concerning any communications about Sexual Relations between you and Heather Clem during the Relevant Time Period.

**RESPONSE TO REQUEST 9:**

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 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 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. Responding Party objects to this Request to the extent that it seeks to invade Responding Party's privacy and the privacy of Heather Clem.

Without waiver of the foregoing, Responding Party responds as follows: To the extent non-privileged documents exist which are relevant or reasonably likely to lead to the discovery of admissible evidence and are not equally available to Gawker Media, Responding Party will endeavor to collect and produce them within a reasonable period of time.

**REQUEST 10:**

Any and all documents concerning any communications with Todd Alan Clem about Sexual Relations during the Relevant Time Period.

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. Responding Party objects to this Request to the extent that it seeks to invade Responding Party's privacy and the privacy of third parties.

Without waiver of the foregoing, Responding Party responds as follows: To the extent non-privileged documents exist which are relevant or reasonably likely to lead to the discovery of admissible evidence and are not equally available to Gawker Media, Responding Party will endeavor to collect and produce them within a reasonable period of time.

**REQUEST 12:**

Any and all documents concerning any videotapes you have made of yourself engaged in Sexual Relations during the Relevant Time Period.

**RESPONSE TO REQUEST 12:**

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 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 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. Responding Party objects to this Request to the extent that it seeks to invade Responding Party's privacy and the privacy of third parties.

Without waiver of the foregoing, Responding Party responds as follows: Responding Party never made a sex tape for the purpose of public dissemination, and thus there are no

responsive, non-privileged documents that relate to any sex tape that Responding Party made for the purpose of public dissemination.

**REQUEST 13:**

Any and all documents concerning any videotapes made of you engaged in Sexual Relations during the Relevant Time Period.

**RESPONSE TO REQUEST 13:**

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 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 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. Responding Party objects to this Request to the extent that it seeks to invade Responding Party's privacy and the privacy of third parties.

Without waiver of the foregoing, Responding Party responds as follows: Responding Party is unaware of any recording of his sexual activity made for the purpose of public dissemination other than the video recording with Heather Clem made without his knowledge, and thus there are no responsive, non-privileged documents that relate to any recording of Responding Party having sex that were made for the purpose of public dissemination, other than documents relating to the Heather Clem sex tape. To the extent non-privileged documents exist relating to the Heather Clem sex tape, which are not equally available to Gawker Media, Responding Party will endeavor to collect and produce them within a reasonable period of time.

that you intend to or may rely upon during trial of this action, either as evidence or for purposes of impeachment, or for refreshing the recollection of a witness.

**RESPONSE TO REQUEST 50:**

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 requires Responding Party to produce documents that would not be created until trial.

DATED: August 21, 2013

Respectfully submitted,



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