

# EXHIBIT 15

to the

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

1 Document Code: 4055  
2 MICHAEL BERRY, ESQ.  
(Florida Pro Hac Vice Number: 108191)  
3 PAUL SAFIER, ESQ.  
(Florida Pro Hac Vice Number: 103437)  
4 LEVINE SULLIVAN KOCH  
& SCHULZ, LLP  
5 1760 MARKET STREET, SUITE 1001  
6 Philadelphia, Pa 19104  
7 Tel. (215) 988-9778  
8 Fax. (215) 988-9750

*Attorneys for Defendant  
Gawker Media, LLC*

9  
10 SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA  
11 IN AND FOR THE COUNTY OF WASHOE

12  
13 TERRY GENE BOLLEA, professionally  
known as HULK HOGAN

14 Plaintiff,

15 v.

16 GAWKER MEDIA, LLC, et al.,

17 Defendants.

Case No.: **CV14 02499**

Dept. No. **7**

18  
19 **SUBPOENA DUCES TECUM**

20 **THE STATE OF NEVADA TO:**

21 Law Office of David Houston  
22 C/O John F. Kirsch (Registered Agent)  
432 Court Street  
23 Reno, NV 89501  
Tel: (877) 833-9478

24 **YOU ARE COMMANDED**, pursuant to this subpoena, to produce copies of all documents  
25 that are in your possession, custody, or control requested in Schedule A to the Florida subpoena  
26 attached hereto as Exhibit 1. Those documents are to be produced to Paul J. Safier, Esquire, c/o  
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1 Legal Process Service, 105 Mary Street, Reno, NV 89509-2831 on or before December 20, 2014 at  
2 10:00 a.m.

3 Please see Exhibit 2, attached hereto, for information regarding the rights of the person  
4 subject to this subpoena. In addition, please see Exhibit 3 for a list of all counsel of record in the  
5 Florida proceeding to which this subpoena relates.  
6

7  
8 Jacqueline L. Bryant, CLERK OF COURT

9 By: **K. Jones**  
10 Deputy Clerk Date **DEC 04 2014**

11  
12 Submitted By:

13 Paul Safier  
14 Florida Pro Hac Vice Number: 103437  
15 Levine Sullivan Koch & Schulz, LLP  
16 1760 Market Street, Suite 1001  
17 Philadelphia, PA 19104  
Tel: (215) 988-9146

18 Counsel for Defendant Gawker Media LLC  
19 in *Bollea v. Gawker Media, LLC, et al.*,  
No. 12012447-CI-011 (Fla. 6th Cir. Ct. Pinellas Cnty.)  
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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.

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**SUBPOENA DUCES TECUM WITHOUT DEPOSITION**

THE STATE OF FLORIDA:

TO: **Law Office of David Houston  
C/O John F. Kirsch (Registered Agent)  
432 Court Street  
Reno, NV 89501**

YOU ARE COMMANDED by Defendant Gawker Media, LLC, to produce the documents described in Schedule A to Paul J. Safier, Esquire, c/o Legal Process Service, 105 Mary Street, Reno, NV 89509-2831 on or before December 8, 2014 at 10:00 a.m.

**In the alternative, you may mail the requested documents to Paul J. Safier, Esquire, Levine Sullivan Koch & Schulz, LLP, 1760 Market Street, Suite 1001, Philadelphia, PA 19103. If you fail to comply, you may be in contempt of court.**

You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney, you shall respond to this subpoena as directed. You have a right to object to the production under Florida Rule of Civil Procedure 1.351 and you will not be required to surrender the documents or things requested. You have the right to designate as Confidential any applicable document as specified under the Agreed Protective Order Governing

EXHIBIT B

Confidentiality, signed and ordered by the Court on July 25, 2013, a copy of which is attached hereto. No testimony will be taken.

DATED on 11/10/2014 .

Gregg D. Thomas, Esquire  
Gregg D. Thomas, Esquire  
For the Court

Gregg D. Thomas  
Florida Bar No. 0223913  
Attorney for Gawker Media, LLC  
Thomas & LoCicero, PL  
601 South Boulevard  
Tampa, FL 33606  
(813) 984-3060 Telephone  
(813) 984-3070 Facsimile  
gthomas@tlolawfirm.com

## DOCUMENTS TO BE PRODUCED

**Request No. 1:** All documents reflecting, referring, or relating to communications with Keith Davidson.

**Request No. 2:** All documents reflecting, referring, or relating to communications with Vilma Duarte.

**Request No. 3:** All documents reflecting, referring, or relating to communications with law enforcement authorities and/or prosecutors (whether connected with federal, state, or local government and including, but not limited to, employees of the Federal Bureau of Investigation, the United States Department of Justice, or the United States Attorney's Office for the Middle District of Florida) relating to the Sex Tapes, Keith Davidson, Vilma Duarte, Bubba Clem, or Heather Clem.

**Request No. 4:** Copies of any Sex Tape other than what has already been exchanged during discovery in the Lawsuit.<sup>1</sup>

**Request No. 5:** All documents reflecting, referring, or relating to communications with people other than Terry Bollea, Jennifer Bollea, and any of Terry Bollea's attorneys about the Sex Tapes prior to the filing of the Lawsuit.

**Request No. 6:** All documents reflecting, referring, or relating to communications with TMZ and any person employed by or working on behalf of TMZ, including but not limited to Harvey Levin and Mike Walters, about one or more of the following: Terry Bollea, Hulk Hogan, Bubba Clem, Heather Clem, the Sex Tapes, or the Lawsuit.

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<sup>1</sup> If you have copies of the Sex Tapes or any of the Sex Tapes, you are instructed to notify counsel for Gawker in writing. Any copies of the Sex Tapes must be preserved and ultimately should be produced to the Special Discovery Magistrate in this case, the Honorable James R. Case.

**Request No. 7:** All documents reflecting, referring, or relating to communications with Bubba Clem, Tom Bean, or any of Bubba Clem's attorneys from January 1, 2012 to the present concerning one or more of the following: Terry Bollea, Hulk Hogan, Heather Clem, the Sex Tapes, TMZ, *The Dirty*, the Lawsuit, or the Gawker Story.

**Request No. 8:** All documents reflecting, referring, or relating to communications with Heather Clem or Heather Clem's attorneys from January 1, 2012 to the present concerning one or more of the following: Terry Bollea, Hulk Hogan, Bubba Clem, the Sex Tapes, the Lawsuit, TMZ, *The Dirty*, or the Gawker Story.

**Request No. 9:** All documents reflecting, referring, or relating to communications with people other than Terry Bollea, Jennifer Bollea, and any of Terry Bollea's attorneys referring to any website owned and operated by Gawker, including, but not limited to, [www.gawker.com](http://www.gawker.com) and [www.deadspin.com](http://www.deadspin.com), prior to the filing of the Lawsuit.

**Request No. 10:** All documents reflecting, referring, or relating to communications with people other than Terry Bollea, Jennifer Bollea, and any of Terry Bollea's attorneys referring to A.J. Daulerio prior to the filing of the Lawsuit.

**Request No. 11:** All documents reflecting, referring, or relating to communications with people other than Terry Bollea, Jennifer Bollea, and any of Terry Bollea's attorneys referring to Nick Denton, prior to the filing of the Lawsuit.

**Request No. 12:** All documents from March 1, 2012 through the present reflecting, referring, or relating to your communications with any employee or agent of any Media outlet concerning one or more of the following: Terry Bollea, Hulk Hogan, Bubba Clem, Heather Clem, the Sex Tapes, or the Lawsuit.

**Request No. 13:** All documents from March 1, 2012 through the filing of the Lawsuit reflecting, referring, or relating to Terry Bollea's or Hulk Hogan's communications with

following: Terry Bollea, Hulk Hogan, Bubba Clem, Heather Clem, the Sex Tapes, the Lawsuit, the Gawker Story, or any contemplated or anticipated litigation concerning the Sex Tapes or the Gawker Story.

**Request No. 19:** All documents referring or relating to your and Terry Bollea's/Hulk Hogan's interview on TMZ on October 9, 2012, which can be found at <http://www.tMZ.com/2012/10/09/tMZ-live-justin-bieber-beer-pong-hulk-hogan-sex-tape-jennifer-lopez-kim-kardashian-kanye-west-jerry-sandusky-stacy-dash-lindsay-long/>.

**Request No. 20:** All documents referring or relating to your statements to TMZ as reported on March 7, 2012 at <http://www.tMZ.com/2012/03/07/hulk-hogan-i-had-no-idea-sex-was-being-filmed/>.

**Request No. 21:** All documents referring or relating to your and Terry Bollea's/Hulk Hogan's interview on TMZ on March 7, 2012, which can be found at <http://www.tMZ.com/2012/03/07/hulk-hogan-sex-tape-partner-tMZ-live/>.

**Request No. 22:** All documents reflecting, referring, or relating to communications with any person or company, including but not limited to Vivid Entertainment, LLC and Sex.com, seeking to obtain copies of, to purchase rights to, or receive permission to publish, post, sell, or otherwise distribute the Sex Tapes or any of them.

**Request No. 23:** All documents reflecting, referring, or relating to communications with Nik Richie or anyone else connected with *The Dirty* about Terry Bollea, Hulk Hogan, Heather Clem, or the Sex Tapes.