

EXHIBIT 12

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.

**THIRD PARTY DAVID HOUSTON'S RESPONSE TO GAWKER MEDIA, LLC'S
SUBPOENA DUCES TECUM**

Third Party DAVID HOUSTON (herein "Responding Party") hereby responds to the subpoena duces tecum propounded by defendant GAWKER MEDIA, LLC (herein "Propounding Party") as follows:

PRELIMINARY STATEMENT

Responding Party responds to the Subpoena 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 since the service of the Subpoena. These responses reflect only Responding Party's current understanding, belief and knowledge regarding the matters about which inquiry was made.

GENERAL OBJECTIONS

1. The following Responses, and each of them, are based upon information and writings presently available to, and located by, Responding Party. Responding Party has not completed an investigation of the facts or discovery proceedings in this case. The fact that Responding Party has responded to a Request should not be taken as an admission that Responding Party accepts or admits the existence of any facts set forth or assumed by such Request, or that such Response constitutes admissible evidence.

2. In addition, the significance of documents which may now be in the possession of Responding Party may only become apparent upon further discovery and review of those documents in the context of other documents which have not yet been identified or obtained in the context of later testimony or discovery which may establish their relevance.

3. These Responses are made, and any and all documents are being produced, solely for the purposes of this litigation. Any documents supplied in response to the Subpoena are being supplied by Responding Party subject to all objections as to competence, relevance, materiality, propriety and admissibility, and to any and all other objections on any ground that would require the exclusion of any document or portion thereof, if such document were offered in evidence in Court, all of which objections and grounds are expressly reserved and may be interposed at the time of trial.

4. Responding Party objects generally to each and every Request to the extent it calls for information that is protected by the attorney-client privilege and/or the attorney work product doctrine. Consistent with Instruction 1 of the Subpoena, Responding Party will not produce any documents protected from disclosure by the attorney-client privilege and/or attorney work-product doctrine.

5. Responding Party objects generally to each and every Request to the extent it requests any information concerning the content of conversations of any party to this action or documents in the possession of any party to this action, other than the Responding Party, in that such information is equally accessible to all parties.

6. Responding Party objects to producing any private and/or confidential business or proprietary information or trade secrets. Consistent with Instruction 2 of the Subpoena, Responding Party will not produce any documents protected from disclosure by Judge Campbell's February 26, 2014, protective order.

7. Responding Party objects to the definition of the word "documents" to the extent that Propounding Party seeks documents not in Responding Party's possession, custody or control.

8. Responding Party objects to the Subpoena to the extent it is not limited to the subject matter of this action and thus are irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence.

9. Responding Party objects to the Subpoena to the extent it is unduly burdensome, oppressive, unreasonably cumulative, duplicative and overbroad.

10. Responding Party objects to the Subpoena to the extent it seeks information to which Propounding Party has equal access.

RESPONSES TO REQUESTS FOR PRODUCTION

The Preliminary Statement and General Objections are incorporated into each response below, regardless of whether specifically mentioned. The specific objections set forth below are

not a waiver, in whole or in part, of any of the foregoing General Objections. Subject to and without waiver of these objections, Responding Party responds below.

REQUEST NO 1: All documents reflecting, referring, or relating to communications with Keith Davidson.

RESPONSE TO REQUEST NO. 1: Responding Party objects to this Request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further 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 grounds that it is vague and ambiguous. Responding Party further objects to this Request to the extent it seeks to invade Responding Party's privacy. Responding Party further objects to this Request to the extent it seeks to invade the privacy of Keith Davidson or other third parties. Responding Party further objects to this Request to the extent it seeks documents protected from disclosure by the settlement privilege. Responding Party further objects to this request on the grounds that it is overbroad and burdensome in that it requires production of irrelevant documents and information. Responding Party further objects to this Request to the extent it calls for information that is protected by the attorney-client privilege and/or the attorney work product doctrine. Consistent with Instruction 1 of the Subpoena, Responding Party will not produce any documents protected from disclosure by the attorney-client privilege and/or attorney work-product doctrine.

Without waiving or otherwise limiting the above objections, Responding Party responds as follows: Responding Party directs Propounding Party to documents previously produced by Plaintiff. Responding Party will produce any responsive, non-privileged, documents not previously produced that are in his possession, custody or control.

REQUEST NO. 2: All documents reflecting, referring, or relating to communications with Vilma Duarte.

RESPONSE TO REQUEST NO. 2: Responding Party objects to this Request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further 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 grounds that it is vague and ambiguous. Responding Party further objects to this Request to the extent it seeks to invade Responding Party's privacy. Responding Party further objects to this Request to the extent it seeks to invade the privacy of Vilma Duarte or other third parties. Responding Party further objects to this Request to the extent it seeks documents protected from disclosure by the settlement privilege. Responding Party further objects to this request on the grounds that it is overbroad and burdensome in that it requires production of irrelevant documents and information. Responding Party further objects to this Request to the extent it calls for information that is protected by the attorney-client privilege and/or the attorney work product doctrine. Consistent with Instruction 1 of the Subpoena, Responding Party will not produce any documents protected from disclosure by the attorney-client privilege and/or attorney work-product doctrine.

Without waiving or otherwise limiting the above objections, Responding Party responds as follows: Responding Party directs Propounding Party to documents previously produced by Plaintiff. Responding Party will produce any responsive, non-privileged, documents not previously produced that are in his possession, custody or control.

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.

RESPONSE TO REQUEST NO. 3: Responding Party objects to this Request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further 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 grounds that it is vague and ambiguous. Responding Party further objects to this Request to the extent it seeks to invade Responding Party's privacy. Responding Party further objects to this Request to the extent it seeks to invade the privacy of third parties. Responding Party further objects to this request on the grounds that it is overbroad and burdensome in that it requires production of irrelevant documents and information. Responding Party further objects to this Request to the extent it calls for information that is protected by the attorney-client privilege and/or the attorney work product doctrine. Consistent with Instruction 1 of the Subpoena, Responding Party will not produce any documents protected from disclosure by the attorney-client privilege and/or attorney work-product doctrine.

Without waiving or otherwise limiting the above objections, Responding Party responds as follows: Responding Party directs Propounding Party to documents previously produced by Plaintiff. Responding Party will produce any responsive, non-privileged, documents not previously produced that are in his possession, custody or control.

REQUEST NO. 4: Copies of any Sex Tape other than what has already been exchanged during discovery in the Lawsuit.

RESPONSE TO REQUEST NO. 4: Responding Party objects to this Request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further objects to this Request to the extent it seeks to invade the privacy of Plaintiff and of third parties. Responding Party further objects to this request on the grounds that it requires production of irrelevant documents and information.

Without waiving or otherwise limiting the above objections, Responding Party responds as follows: Responding Party has no responsive documents.

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.

RESPONSE TO REQUEST NO. 5: Responding Party objects to this Request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further 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 grounds that it is vague and ambiguous. Responding Party further objects to this Request to the extent it seeks to invade Responding Party's privacy. Responding Party further objects to this Request to the extent it seeks to invade the privacy of third parties. Responding Party further objects to this Request to the extent it seeks documents protected from disclosure by the settlement privilege. Responding Party further objects to this request on the grounds that it is overbroad and burdensome in that it requires production of irrelevant documents and information. Responding Party further objects to this Request to the extent it calls for information that is protected by the attorney-client privilege and/or the attorney work product doctrine. Consistent with Instruction 1 of the Subpoena, Responding Party will not produce any

documents protected from disclosure by the attorney-client privilege and/or attorney work-product doctrine.

Without waiving or otherwise limiting the above objections, Responding Party responds as follows: Responding Party directs Propounding Party to documents previously produced by Plaintiff. Responding Party will produce any responsive, non-privileged, documents not previously produced that are in his possession, custody or control.

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.

RESPONSE TO REQUEST NO. 6: Responding Party objects to this Request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further 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 grounds that it is vague and ambiguous. Responding Party further objects to this Request to the extent it seeks to invade Responding Party's privacy. Responding Party further objects to this Request to the extent it seeks to invade the privacy of third parties. Responding Party further objects to this request on the grounds that it is overbroad and burdensome in that it requires production of irrelevant documents and information. Responding Party further objects to this Request to the extent it calls for information that is protected by the attorney-client privilege and/or the attorney work product doctrine. Consistent with Instruction 1 of the Subpoena, Responding Party will not produce any documents protected from disclosure by the attorney-client privilege and/or attorney work-product doctrine.

Without waiving or otherwise limiting the above objections, Responding Party responds as follows: Responding Party directs Propounding Party to documents previously produced by Plaintiff. Responding Party will produce any responsive, non-privileged, documents not previously produced that are in his possession, custody or control.

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.

RESPONSE TO REQUEST NO. 7: Responding Party objects to this Request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further 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 grounds that it is vague and ambiguous. Responding Party further objects to this Request to the extent it seeks to invade Responding Party's privacy. Responding Party further objects to this Request to the extent it seeks to invade the privacy of Plaintiff. Responding Party further objects to this Request to the extent it seeks to invade the privacy of third parties. Responding Party further objects to this Request to the extent it seeks documents protected from disclosure by the settlement privilege. Responding Party further objects to this request on the grounds that it is overbroad and burdensome in that it requires production of irrelevant documents and information. Responding Party further objects to this Request to the extent it calls for information that is protected by the attorney-client privilege and/or the attorney work product doctrine. Consistent with Instruction 1 of the Subpoena, Responding Party will not produce any documents protected from disclosure by the attorney-client privilege and/or attorney work-

product doctrine.

Without waiving or otherwise limiting the above objections, Responding Party responds as follows: Responding Party directs Propounding Party to documents previously produced by Plaintiff. Responding Party will produce any responsive, non-privileged, documents not previously produced that are in his possession, custody or control.

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.

RESPONSE TO REQUEST NO. 8: Responding Party objects to this Request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further 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 grounds that it is vague and ambiguous. Responding Party further objects to this Request to the extent it seeks to invade Responding Party's privacy. Responding Party further objects to this Request to the extent it seeks to invade the privacy of Plaintiff. Responding Party further objects to this Request to the extent it seeks to invade the privacy of third parties. Responding Party further objects to this Request to the extent it seeks documents protected from disclosure by the settlement privilege. Responding Party further objects to this request on the grounds that it is overbroad and burdensome in that it requires production of irrelevant documents and information. Responding Party further objects to this Request to the extent it calls for information that is protected by the attorney-client privilege and/or the attorney work product doctrine. Consistent with Instruction 1 of the Subpoena, Responding Party will not produce any

documents protected from disclosure by the attorney-client privilege and/or attorney work-product doctrine.

Without waiving or otherwise limiting the above objections, Responding Party responds as follows: Responding Party directs Propounding Party to documents previously produced by Plaintiff. Responding Party will produce any responsive, non-privileged, documents not previously produced that are in his possession, custody or control.

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 and www.deadspin.com, prior to the filing of the Lawsuit.

RESPONSE TO REQUEST NO. 9: Responding Party objects to this Request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further 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 grounds that it is vague and ambiguous. Responding Party further objects to this Request to the extent it seeks to invade Responding Party's privacy. Responding Party further objects to this Request to the extent it seeks to invade the privacy of Plaintiff. Responding Party further objects to this Request to the extent it seeks to invade the privacy of third parties. Responding Party further objects to this Request to the extent it seeks documents protected from disclosure by the settlement privilege. Responding Party further objects to this request on the grounds that it is overbroad and burdensome in that it requires production of irrelevant documents and information. Responding Party further objects to this Request to the extent it calls for information that is protected by the attorney-client privilege and/or the attorney work product

doctrine. Consistent with Instruction 1 of the Subpoena, Responding Party will not produce any documents protected from disclosure by the attorney-client privilege and/or attorney work-product doctrine.

Without waiving or otherwise limiting the above objections, Responding Party responds as follows: Responding Party directs Propounding Party to documents previously produced by Plaintiff. Responding Party will produce any responsive, non-privileged, documents not previously produced that are in his possession, custody or control.

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.

RESPONSE TO REQUEST NO. 10: Responding Party objects to this Request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further 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 grounds that it is vague and ambiguous. Responding Party further objects to this Request to the extent it seeks to invade Responding Party's privacy. Responding Party further objects to this Request to the extent it seeks to invade the privacy of Plaintiff. Responding Party further objects to this Request to the extent it seeks to invade the privacy of third parties. Responding Party further objects to this Request to the extent it seeks documents protected from disclosure by the settlement privilege. Responding Party further objects to this request on the grounds that it is overbroad and burdensome in that it requires production of irrelevant documents and information. Responding Party further objects to this Request to the extent it calls for information that is protected by the attorney-client privilege and/or the attorney work product

doctrine. Consistent with Instruction 1 of the Subpoena, Responding Party will not produce any documents protected from disclosure by the attorney-client privilege and/or attorney work-product doctrine.

Without waiving or otherwise limiting the above objections, Responding Party responds as follows: Responding Party directs Propounding Party to documents previously produced by Plaintiff. Responding Party will produce any responsive, non-privileged, documents not previously produced that are in his possession, custody or control.

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.

RESPONSE TO REQUEST NO. 11: Responding Party objects to this Request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further 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 grounds that it is vague and ambiguous. Responding Party further objects to this Request to the extent it seeks to invade Responding Party's privacy. Responding Party further objects to this Request to the extent it seeks to invade the privacy of Plaintiff. Responding Party further objects to this Request to the extent it seeks to invade the privacy of third parties. Responding Party further objects to this Request to the extent it seeks documents protected from disclosure by the settlement privilege. Responding Party further objects to this request on the grounds that it is overbroad and burdensome in that it requires production of irrelevant documents and information. Responding Party further objects to this Request to the extent it calls for information that is protected by the attorney-client privilege and/or the attorney work product

doctrine. Consistent with Instruction 1 of the Subpoena, Responding Party will not produce any documents protected from disclosure by the attorney-client privilege and/or attorney work-product doctrine.

Without waiving or otherwise limiting the above objections, Responding Party responds as follows: Responding Party directs Propounding Party to documents previously produced by Plaintiff. Responding Party will produce any responsive, non-privileged, documents not previously produced that are in his possession, custody or control.

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.

RESPONSE TO REQUEST NO. 12: Responding Party objects to this Request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further 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 grounds that it is vague and ambiguous. Responding Party further objects to this Request to the extent it seeks to invade Responding Party's privacy. Responding Party further objects to this Request to the extent it seeks to invade the privacy of Plaintiff. Responding Party further objects to this Request to the extent it seeks to invade the privacy of third parties. Responding Party further objects to this Request to the extent it seeks documents protected from disclosure by the settlement privilege. Responding Party further objects to this request on the grounds that it is overbroad and burdensome in that it requires production of irrelevant documents and information. Responding Party further objects to this Request to the extent it calls for

information that is protected by the attorney-client privilege and/or the attorney work product doctrine. Consistent with Instruction 1 of the Subpoena, Responding Party will not produce any documents protected from disclosure by the attorney-client privilege and/or attorney work-product doctrine.

Without waiving or otherwise limiting the above objections, Responding Party responds as follows: Responding Party directs Propounding Party to documents previously produced by Plaintiff. Responding Party will produce any responsive, non-privileged, documents not previously produced that are in his possession, custody or control.

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 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.

RESPONSE TO REQUEST NO. 13: Responding Party objects to this Request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further 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 grounds that it is vague and ambiguous. Responding Party further objects to this Request to the extent it seeks to invade Responding Party's privacy. Responding Party further objects to this Request to the extent it seeks to invade the privacy of Plaintiff. Responding Party further objects to this Request to the extent it seeks to invade the privacy of third parties. Responding Party further objects to this Request to the extent it seeks documents protected from disclosure by the settlement privilege. Responding Party further objects to this request on the grounds that it is overbroad and burdensome in that it requires production of irrelevant documents and

information. Responding Party further objects to this Request to the extent it calls for information that is protected by the attorney-client privilege and/or the attorney work product doctrine. Consistent with Instruction 1 of the Subpoena, Responding Party will not produce any documents protected from disclosure by the attorney-client privilege and/or attorney work-product doctrine.

Without waiving or otherwise limiting the above objections, Responding Party responds as follows: Responding Party directs Propounding Party to documents previously produced by Plaintiff. Responding Party will produce any responsive, non-privileged, documents not previously produced that are in his possession, custody or control.

REQUEST NO. 14: For the period from March 1, 2012 to the filing of the Lawsuit, all documents referring or relating to Jules Wortman that also refer or relate to one or more of the 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.

RESPONSE TO REQUEST NO. 14: Responding Party objects to this Request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further 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 grounds that it is vague and ambiguous. Responding Party further objects to this Request to the extent it seeks to invade Responding Party's privacy. Responding Party further objects to this Request to the extent it seeks to invade the privacy of Plaintiff. Responding Party further objects to this Request to the extent it seeks to invade the privacy of third parties. Responding Party further objects to this Request to the extent it seeks documents protected from disclosure

by the settlement privilege. Responding Party further objects to this request on the grounds that it is overbroad and burdensome in that it requires production of irrelevant documents and information. Responding Party further objects to this Request to the extent it calls for information that is protected by the attorney-client privilege and/or the attorney work product doctrine. Consistent with Instruction 1 of the Subpoena, Responding Party will not produce any documents protected from disclosure by the attorney-client privilege and/or attorney work-product doctrine.

Without waiving or otherwise limiting the above objections, Responding Party responds as follows: Responding Party directs Propounding Party to documents previously produced by Plaintiff. Responding Party will produce any responsive, non-privileged, documents not previously produced that are in his possession, custody or control.

REQUEST NO. 15: For the period from March 1, 2012 to the filing of the Lawsuit, all documents referring or relating to Wortman Works that also refer or relate to one or more of the 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.

RESPONSE TO REQUEST NO. 15: Responding Party objects to this Request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further 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 grounds that it is vague and ambiguous. Responding Party further objects to this Request to the extent it seeks to invade Responding Party's privacy. Responding Party further objects to this Request to the extent it seeks to invade the privacy of Plaintiff. Responding Party further

objects to this Request to the extent it seeks to invade the privacy of third parties. Responding Party further objects to this Request to the extent it seeks documents protected from disclosure by the settlement privilege. Responding Party further objects to this request on the grounds that it is overbroad and burdensome in that it requires production of irrelevant documents and information. Responding Party further objects to this Request to the extent it calls for information that is protected by the attorney-client privilege and/or the attorney work product doctrine. Consistent with Instruction 1 of the Subpoena, Responding Party will not produce any documents protected from disclosure by the attorney-client privilege and/or attorney work-product doctrine.

Without waiving or otherwise limiting the above objections, Responding Party responds as follows: Responding Party directs Propounding Party to documents previously produced by Plaintiff. Responding Party will produce any responsive, non-privileged, documents not previously produced that are in his possession, custody or control.

REQUEST NO. 16: For the period from March 1, 2012 to the filing of the Lawsuit, all documents referring or relating to TNA that also refer or relate to one or more of the 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.

RESPONSE TO REQUEST NO. 16: Responding Party objects to this Request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further 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 grounds that it is vague and ambiguous. Responding Party further objects to this Request to

the extent it seeks to invade Responding Party's privacy. Responding Party further objects to this Request to the extent it seeks to invade the privacy of Plaintiff. Responding Party further objects to this Request to the extent it seeks to invade the privacy of third parties. Responding Party further objects to this Request to the extent it seeks documents protected from disclosure by the settlement privilege. Responding Party further objects to this request on the grounds that it is overbroad and burdensome in that it requires production of irrelevant documents and information. Responding Party further objects to this Request to the extent it calls for information that is protected by the attorney-client privilege and/or the attorney work product doctrine. Consistent with Instruction 1 of the Subpoena, Responding Party will not produce any documents protected from disclosure by the attorney-client privilege and/or attorney work-product doctrine. Further, consistent with Instruction 2 of the subpoena, Responding Party will not produce any documents protected from disclosure by Judge Campbell's February 26, 2014, protective order which states, in relevant part, that "inquiry into the . . . financial records . . . of Terry Bollea . . . is hereby prohibited."

Without waiving or otherwise limiting the above objections, Responding Party responds as follows: Responding Party directs Propounding Party to documents previously produced by Plaintiff. Responding Party will produce any responsive, non-privileged, documents not previously produced that are in his possession, custody or control.

REQUEST NO. 17: For the period from March 1, 2012 to the filing of the Lawsuit, all documents referring or relating to Elizabeth Traub that also refer or relate to one or more of the 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.

RESPONSE TO REQUEST NO. 17: Responding Party objects to this Request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further 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 grounds that it is vague and ambiguous. Responding Party further objects to this Request to the extent it seeks to invade Responding Party's privacy. Responding Party further objects to this Request to the extent it seeks to invade the privacy of Plaintiff. Responding Party further objects to this Request to the extent it seeks to invade the privacy of third parties. Responding Party further objects to this Request to the extent it seeks documents protected from disclosure by the settlement privilege. Responding Party further objects to this Request to the extent it calls for information that is protected by the attorney-client privilege and/or the attorney work product doctrine. Consistent with Instruction 1 of the Subpoena, Responding Party will not produce any documents protected from disclosure by the attorney-client privilege and/or attorney work-product doctrine. Further, consistent with Instruction 2 of the subpoena, Responding Party will not produce any documents protected from disclosure by Judge Campbell's February 26, 2014, protective order which states, in relevant part, that "inquiry into the . . . financial records . . . of Terry Bollea . . . is hereby prohibited."

Without waiving or otherwise limiting the above objections, Responding Party responds as follows: Responding Party directs Propounding Party to documents previously produced by Plaintiff. Responding Party will produce any responsive, non-privileged, documents not previously produced that are in his possession, custody or control.

REQUEST NO. 18: For the period from March 1, 2012 to the filing of the Lawsuit, all documents referring or relating to EJ Media Group that also refer or relate to one or more of the

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.

RESPONSE TO REQUEST NO. 18: Responding Party objects to this Request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further 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 grounds that it is vague and ambiguous. Responding Party further objects to this Request to the extent it seeks to invade Responding Party's privacy. Responding Party further objects to this Request to the extent it seeks to invade the privacy of Plaintiff. Responding Party further objects to this Request to the extent it seeks to invade the privacy of third parties. Responding Party further objects to this Request to the extent it seeks documents protected from disclosure by the settlement privilege. Responding Party further objects to this request on the grounds that it is overbroad and burdensome in that it requires production of irrelevant documents and information. Responding Party further objects to this Request to the extent it calls for information that is protected by the attorney-client privilege and/or the attorney work product doctrine. Consistent with Instruction 1 of the Subpoena, Responding Party will not produce any documents protected from disclosure by the attorney-client privilege and/or attorney work-product doctrine. Further, consistent with Instruction 2 of the subpoena, Responding Party will not produce any documents protected from disclosure by Judge Campbell's February 26, 2014, protective order which states, in relevant part, that "inquiry into the . . . financial records . . . of Terry Bollea . . . is hereby prohibited."

Without waiving or otherwise limiting the above objections, Responding Party responds as follows: Responding Party directs Propounding Party to documents previously produced by Plaintiff. Responding Party will produce any responsive, non-privileged, documents not previously produced that are in his possession, custody or control.

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/>.

RESPONSE TO REQUEST NO. 19: Responding Party objects to this Request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further 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 grounds that it is vague and ambiguous. Responding Party further objects to this Request to the extent it seeks to invade Responding Party's privacy. Responding Party further objects to this Request to the extent it seeks to invade the privacy of Plaintiff. Responding Party further objects to this Request to the extent it seeks to invade the privacy of third parties. Responding Party further objects to this Request to the extent it seeks documents protected from disclosure by the settlement privilege. Responding Party further objects to this request on the grounds that it is overbroad and burdensome in that it requires production of irrelevant documents and information. Responding Party further objects to the extent that documents are available through publically accessible sources. Responding Party further objects to this Request to the extent it calls for information that is protected by the attorney-client privilege and/or the attorney work product doctrine. Consistent with Instruction 1 of the Subpoena, Responding Party will not

produce any documents protected from disclosure by the attorney-client privilege and/or attorney work-product doctrine.

Without waiving or otherwise limiting the above objections, Responding Party responds as follows: Responding Party directs Propounding Party to documents previously produced by Plaintiff. Responding Party will produce any responsive, non-privileged, documents not previously produced that are in his possession, custody or control.

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/>.

RESPONSE TO REQUEST NO. 20: Responding Party objects to this Request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further 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 grounds that it is vague and ambiguous. Responding Party further objects to this Request to the extent it seeks to invade Responding Party's privacy. Responding Party further objects to this Request to the extent it seeks to invade the privacy of Plaintiff. Responding Party further objects to this Request to the extent it seeks to invade the privacy of third parties. Responding Party further objects to this Request to the extent it seeks documents protected from disclosure by the settlement privilege. Responding Party further objects to this request on the grounds that it is overbroad and burdensome in that it requires production of irrelevant documents and information. Responding Party further objects to the extent that documents are available through publically accessible sources. Responding Party further objects to this Request to the extent it calls for information that is protected by the attorney-client privilege and/or the attorney work

product doctrine. Consistent with Instruction 1 of the Subpoena, Responding Party will not produce any documents protected from disclosure by the attorney-client privilege and/or attorney work-product doctrine.

Without waiving or otherwise limiting the above objections, Responding Party responds as follows: Responding Party directs Propounding Party to documents previously produced by Plaintiff. Responding Party will produce any responsive, non-privileged, documents not previously produced that are in his possession, custody or control.

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/>.

RESPONSE TO REQUEST NO. 21: Responding Party objects to this Request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further 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 grounds that it is vague and ambiguous. Responding Party further objects to this Request to the extent it seeks to invade Responding Party's privacy. Responding Party further objects to this Request to the extent it seeks to invade the privacy of Plaintiff. Responding Party further objects to this Request to the extent it seeks to invade the privacy of third parties. Responding Party further objects to this Request to the extent it seeks documents protected from disclosure by the settlement privilege. Responding Party further objects to this request on the grounds that it is overbroad and burdensome in that it requires production of irrelevant documents and information. Responding Party further objects to the extent that documents are available through publically accessible sources. Responding Party further objects to this Request to the extent it

calls for information that is protected by the attorney-client privilege and/or the attorney work product doctrine. Consistent with Instruction 1 of the Subpoena, Responding Party will not produce any documents protected from disclosure by the attorney-client privilege and/or attorney work-product doctrine.

Without waiving or otherwise limiting the above objections, Responding Party responds as follows: Responding Party directs Propounding Party to documents previously produced by Plaintiff. Responding Party will produce any responsive, non-privileged, documents not previously produced that are in his possession, custody or control.

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.

RESPONSE TO REQUEST NO. 22: Responding Party objects to this Request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further 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 grounds that it is vague and ambiguous. Responding Party further objects to this Request to the extent it seeks to invade Responding Party's privacy. Responding Party further objects to this Request to the extent it seeks to invade the privacy of Plaintiff. Responding Party further objects to this Request to the extent it seeks to invade the privacy of third parties. Responding Party further objects to this Request to the extent it seeks documents protected from disclosure by the settlement privilege. Responding Party further objects to this request on the grounds that it is overbroad and burdensome in that it requires production of irrelevant documents and

information. Responding Party further objects to the extent that documents are available through publically accessible sources. Responding Party further objects to this Request to the extent it calls for information that is protected by the attorney-client privilege and/or the attorney work product doctrine. Consistent with Instruction 1 of the Subpoena, Responding Party will not produce any documents protected from disclosure by the attorney-client privilege and/or attorney work-product doctrine.

Without waiving or otherwise limiting the above objections, Responding Party responds as follows: Responding Party directs Propounding Party to documents previously produced by Plaintiff. Responding Party will produce any responsive, non-privileged, documents not previously produced that are in his possession, custody or control.

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.


RESPONSE TO REQUEST NO. 23: Responding Party objects to this Request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Responding Party further 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 grounds that it is vague and ambiguous. Responding Party further objects to this Request to the extent it seeks to invade Responding Party's privacy. Responding Party further objects to this Request to the extent it seeks to invade the privacy of Plaintiff. Responding Party further objects to this Request to the extent it seeks to invade the privacy of third parties. Responding Party further objects to this Request to the extent it seeks documents protected from disclosure by the settlement privilege. Responding Party further objects to this request on the grounds that

it is overbroad and burdensome in that it requires production of irrelevant documents and information. Responding Party further objects to the extent that documents are available through publically accessible sources. Responding Party further objects to this Request to the extent it calls for information that is protected by the attorney-client privilege and/or the attorney work product doctrine. Consistent with Instruction 1 of the Subpoena, Responding Party will not produce any documents protected from disclosure by the attorney-client privilege and/or attorney work-product doctrine.

Without waiving or otherwise limiting the above objections, Responding Party responds as follows: Responding Party directs Propounding Party to documents previously produced by Plaintiff. Responding Party will produce any responsive, non-privileged, documents not previously produced that are in his possession, custody or control.

DATED: December 18, 2014

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by e-mail this 19th day of December, 2014 to the following:

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