

EXHIBIT S

to the

**GAWKER DEFENDANTS' MOTION FOR ACCESS TO CORRECTED AND
UNREDACTED DVDS PRODUCED BY THE FBI**

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 INTERROGATORIES**

PROPOUNDING PARTY: Defendant GAWKER MEDIA, LLC

RESPONDING PARTY: Plaintiff TERRY GENE BOLLEA

SET NO.: ONE

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

PRELIMINARY STATEMENT

Responding Party responds to the Interrogatories subject to, without intending to waive, 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.

exist.

INTERROGATORY 4:

Identify any and all videotapes or other recordings of any type you have made of yourself engaged in Sexual Relations during the Relevant Time Period.

RESPONSE TO INTERROGATORY 4:

Responding Party objects to this Interrogatory to the extent that it seeks information protected from disclosure by the attorney-client privilege and/or attorney work product doctrine. Responding Party objects to this Interrogatory on the ground that the Interrogatory is overbroad and burdensome to the extent that it seeks discovery of whether recordings were made or existed for private purposes, which have nothing to do with the public dissemination of a sex tape by Responding Party. Responding Party objects to this Interrogatory on the ground that it is so broad on its face that it requires production of irrelevant information. Responding Party further objects to this Interrogatory to the extent that it seeks information that is 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 Interrogatory 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 has never made a recording of his sexual activity for the purpose of public dissemination, and has never consented to the making or dissemination of such a recording.

INTERROGATORY 5:

Identify any and all videotapes or other recordings of any type made of you having Sexual Relations during the Relevant Time Period.

RESPONSE TO INTERROGATORY 5:

Responding Party objects to this Interrogatory to the extent that it seeks information protected from disclosure by the attorney-client privilege and/or attorney work product doctrine. Responding Party objects to this Interrogatory on the ground that the Interrogatory is overbroad and burdensome to the extent that it seeks discovery of whether recordings were made or existed for private purposes, which have nothing to do with the public dissemination of a sex tape by Responding Party. Responding Party objects to this Interrogatory on the ground that it is so broad on its face that it requires production of irrelevant information. Responding Party further objects to this Interrogatory to the extent that it seeks information that is 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 Interrogatory 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 has never made a recording of his sexual activity for the purpose of public dissemination, and has never consented to the making or dissemination of such a recording. Responding Party does not know if any other clandestine recordings exist other than the video depicting Responding Party having relations with Heather Clem (which was excerpted and posted by Gawker Media on its website).

INTERROGATORY 6:

Identify any and all writings authored by you during the Relevant Time Period regarding any Sexual Relations in which you engaged.

RESPONSE TO INTERROGATORY 6:

Responding Party objects to this Interrogatory to the extent that it seeks information