

EXHIBIT 30

to the

**THE GAWKER DEFENDANTS' MOTION TO DISMISS
ON THE GROUNDS OF FRAUD ON THE COURT**

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
A.J. DAULERIO'S INTERROGATORIES**

PROPOUNDING PARTY: Defendant A.J. DAULERIO

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 A.J. DAULERIO (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.

These responses are based upon a diligent investigation undertaken by Responding Party and its counsel since the service of these Interrogatories. These responses reflect only Responding Party's current understanding, belief and knowledge regarding the matters about which inquiry was made. Responding Party has not yet had sufficient opportunity to depose or interview all persons who may have knowledge of relevant facts, or to discover or otherwise obtain and review all documents which may have some bearing on this case.

Consequently, there may exist further information, documents and persons with knowledge relevant to these Interrogatories of which Responding Party is not currently aware. As this action proceeds, Responding Party anticipates that further facts, witnesses and documents may be discovered or identified. Without in any way obligating it to do so, Responding Party reserves the right to offer further or different evidence or information at trial or at any pretrial proceeding. These responses are not in any way to be deemed an admission or representation that there are no further facts, documents or witnesses having knowledge relevant to the subject matter of these Interrogatories.

GENERAL OBJECTIONS

1. The following Responses, and each of them, are based upon information and writings presently available to, and located by, Responding Party and its attorneys. Responding Party has not completed an investigation of the facts or discovery proceedings in this case and has not completed its preparation for trial. The following Responses, and each of them, are made without prejudice to Responding Party's right to produce evidence based on subsequently discovered facts or documents, and to offer such facts or documents in evidence at the time of trial. The fact that Responding Party has responded to an Interrogatory should not be taken as an admission that Responding Party accepts or admits the existence of any facts set forth or

assumed by such Interrogatory, or that such Response constitutes admissible evidence. The following Responses, and each of them, are made without prejudice to the rights of Responding Party to introduce evidence of any subsequently discovered facts or documents which Responding Party may later obtain, discover or recall.

2. The documents and information which could or would form the basis of responses to the instant Interrogatories, in whole or in part, are still in the process of being identified by Responding Party, and all such relevant documents and information have not yet been identified, examined or produced. In addition, the significance of documents and information which may now be in the possession of Responding Party may only become apparent upon further discovery and review of those documents and information 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 Requests 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 ground are expressly reserved and may be interposed at the time of trial.

4. Responding Party, accordingly, reserves the right to alter or modify any and all Responses set forth herein as additional facts may be ascertained, documents discovered, analyses made, witnesses identified, additional parties identified, legal research completed, and contentions made or expanded.

5. Responding Party objects generally to each and every Interrogatory to the extent it calls for information that is protected by the attorney-client privilege and/or the attorney work product doctrine.

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

7. Responding Party objects to producing any private and/or confidential business or proprietary information or trade secrets.

8. Responding Party objects to these Interrogatories, and each of them, to the extent they are 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 these Interrogatories, and each of them, to the extent they are unduly burdensome, oppressive, unreasonably cumulative, duplicative and overbroad.

10. Responding Party objects to these Interrogatories, and each of them, to the extent they seek information to which Propounding Party has equal access.

RESPONSES TO INTERROGATORIES

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.

INTERROGATORY 1:

State the total amount of your gross annual income (and, if you had more than one source

of income, identify each source separately and provide the amount received from each such source) for each calendar year during the Relevant Time Period and identify all documents reflecting that amount for each such year.

RESPONSE TO INTERROGATORY 1:

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 in that it asks Responding Party to identify all documents of any sort that could establish his income or any portion of it. 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.

INTERROGATORY 2:

Identify all medical providers and health care professionals you have seen as a result of your alleged emotional distress you claim was caused by the alleged actions of the Gawker Defendants or any of them, and identify all documents relating to such providers and professionals.

RESPONSE TO INTERROGATORY 2:

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 to the extent that it seeks to invade Responding Party's privacy and the privacy of third parties. Responding Party further objects to this Interrogatory on the ground that it has improper subparts. Responding Party further objects to this Interrogatory on the ground that the emotional distress claim asserted in this litigation is a "garden variety" emotional distress claim, *i.e.*, a claim based on the fact that Gawker Media's conduct is so outrageous to an ordinary person that it was almost certain to cause emotional distress. The assertion of such a claim does not require or permit discovery into Responding Party's intimate medical and/or mental health history.

INTERROGATORY 3:

Identify any and all accountant(s), bookkeeper(s), business attorney(s), and persons who prepared any tax form on your behalf or on behalf of any entity controlled or owned by you during the Relevant Time Period.

RESPONSE TO INTERROGATORY 3:

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 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.

INTERROGATORY 4:

Identify any and all facts supporting your claim in the Complaint that Heather Clem

violated your privacy rights by participating in videotaping you having Sexual Relations with her without your knowledge, and identify all documents relating to such claim, and all persons having knowledge of the facts relating to such claim.

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 further objects to this Interrogatory on the ground that it has improper subparts.

Without waiver of the foregoing, Responding Party responds as follows: Todd and Heather Clem repeatedly requested that Responding Party have sex with her over a two year period, and arranged it so that the activity could occur in a bedroom in her house where, unbeknownst to Responding Party, recording equipment apparently was present. Responding Party believes that Heather Clem, among others, was involved in the recording of Responding Party, and the dissemination of that recording to Gawker Media. Discovery is continuing as to Heather Clem's actions and her role in the events that took place. Discovery also is continuing regarding the documents and witnesses that would show Heather Clem's role; however, persons with knowledge of these facts include Heather and Todd Clem, Responding Party, and Gawker Media and its principals and employees, the whereabouts of whom are all known to Gawker Media and Responding Party.

INTERROGATORY 5:

State each address at which you have resided during the Relevant Time Period, and identify each person with whom you have shared a residence 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 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.

INTERROGATORY 6:

Identify any and all facts supporting your claim that the Video was taken without your knowledge, consent or approval, and identify all documents relating to such claim, and all persons having knowledge of the facts relating to such claim.

RESPONSE TO INTERROGATORY 6:

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 further objects to this Interrogatory on the ground that it has improper subparts.

Without waiver of the foregoing, Responding Party responds as follows: Responding Party was not aware at the time he engaged in sexual relations with Heather Clem that the encounter was being recorded, and was never told by the Clems or anyone else that the encounter would be recorded. Responding Party never approved or consented to recording the sexual activity, and would never have done so. There are no writings that show knowledge, consent, or

approval by Responding Party of the recording of the sexual activity with Heather Clem. Discovery is continuing, but persons with knowledge include Heather and Todd Clem and Responding Party, the whereabouts of whom are all known to Gawker Media and Propounding Party.

INTERROGATORY 7:

Identify all facts supporting your claim that the Gawker Defendants, or any of them, acted intentionally and maliciously, as alleged in the Complaint, and identify all documents relating to such claim, and all persons having knowledge of the facts relating to such claim.

RESPONSE TO INTERROGATORY 7:

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 further objects to this Interrogatory on the ground that it has improper subparts.

Without waiver of the foregoing, Responding Party responds as follows: The very nature of the Gawker Defendants' actions demonstrate malice and scienter. Such actions include but are not limited to: (1) the decision to publish excerpts of the sex tape without taking any action to determine whether it had a legal right to do so and despite the fact that the tape appeared to be clandestinely recorded; (2) the decision to publish explicit excerpts of the sex tape which were not necessary for any journalistic purpose; (3) the decision to publish a detailed play-by-play narrative of the contents of the remainder of the tape, including gratuitous descriptions of Responding Party's private parts; (4) the decision to use a headline that emphasized the explicit content of the sex tape and urging readers to watch it; (5) the refusal to take the sex tape and sex narrative down or even to remove the explicit footage despite Responding Party's repeated

requests; and (6) the decision to refuse to comply with the Court's temporary injunction order and to flaunt publicly Gawker Media's disobedience of that order. Discovery into the Gawker Defendants' malicious and intentional conduct is continuing. Documents that evidence Gawker Media's malice and intent include, but are not limited to, the web page containing the sex tape and sex narrative, and the web page that was posted in response to the Court's temporary injunction order, as well as Gawker Media's responses to interrogatories and requests for admission relating to the steps it failed to take to determine whether its actions were legal or whether the participants consented to the publication of the Sex Tape. Discovery is continuing and additional documents may be discovered. The persons with knowledge of the Gawker Defendants' malice include Gawker Media's present and former principals, employees, and lawyers, the whereabouts of whom are all known to and equally available to Gawker Media and Propounding Party.

INTERROGATORY 8:

Identify each person whom you believe may have knowledge concerning any of the allegations of your Complaint in this action. As to each such person, state the subject matter about which you believe that person has knowledge and the substance of the facts about which you believe that person has knowledge.

RESPONSE TO INTERROGATORY 8:

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 requested information is not identified with reasonable particularity. Responding Party objects to this Interrogatory on the ground that the Interrogatory is overbroad and burdensome in that it asks Responding Party to identify all the different potential issues in this case and identify all the potential witnesses with

respect to each of those issues. Responding Party objects to this Interrogatory on the ground that it is vague and ambiguous. Responding Party further objects to this Interrogatory on the ground that it has improper subparts.

Without waiver of the foregoing, Responding Party responds as follows: Responding Party has knowledge of the conduct that was depicted on the sex tape, his lack of consent to the recording and dissemination of the sex tape, and his damages. Heather and Todd Clem have knowledge of the conduct that was depicted on the sex tape, Responding Party's lack of consent to the recording and dissemination of the sex tape, and how the sex tape came to be recorded and disseminated. The present and former principals, employees, and lawyers of Gawker Media have knowledge of how the sex tape came to be recorded and disseminated, Responding Party's damages, the selection and editing process that resulted in the decision to publish the portions of the recording that were published, and the Gawker Defendants' scienter. The whereabouts of these persons are all known to and equally available to Gawker Media and Propounding Party. Discovery is continuing, and additional fact and/or expert witnesses may be discovered or identified.

DATED: August 21, 2013



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VERIFICATION TO FOLLOW

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via U.S. First Class Mail this 21 day of August, 2013 to the following:

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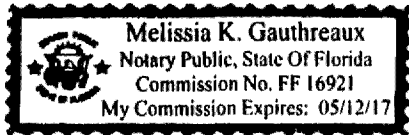
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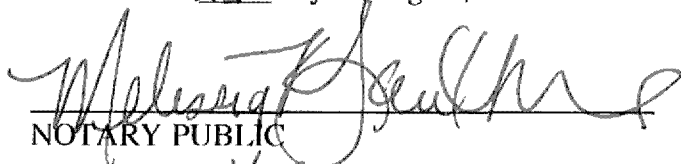

TERRY GENE BOLLEA

STATE OF FLORIDA
COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared Terry Gene Bollea, known to me to be said person or who produced _____ as identification, who being first duly sworn, deposes and says that the above Responses to A.J. Daulerio's Interrogatories herein are true and correct to the best of his/her knowledge and belief.

SWORN TO AND SUBSCRIBED before me this 22nd day of August, 2013.




NOTARY PUBLIC
Melissa K. Gauthreaux
Printed Name of Notary Public

My Commission Expires:

5/12/17