

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.

_____ /

FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS
TO DEFENDANT KINJA KFT f/k/a BLOGWIRE HUNGARY SZELLEMI
ALKOTAST HASZNOSITO

Pursuant to Florida Rules of Civil Procedure 1.350, Plaintiff Terry Gene Bollea, professionally known as Hulk Hogan (“PLAINTIFF”) hereby requests that Defendant Kinja KFT f/k/a Blogwire Hungary Szellemi Alkotast Hasznosito KFT produce for inspection and copying each of the documents or categories of documents described hereafter at the law offices of Bajo Cuva Cohen & Turkel, P.A., 100 North Tampa Street, Suite 1900, Tampa, Florida 33602.

Pursuant to the provisions of Florida Rule of Civil Procedure 1.350, you are required to produce the documents requested below, numbered 1 though 116, within thirty days from the certificate of service.

ELECTRONICALLY FILED 5/1/2014 5:30:50 PM: KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

Definitions and Instructions

As used in this Request for Production of Documents:

1. “YOU,” “YOUR” or “KINJA” means Kinja KFT f/k/a Blogwire Hungary Szellemi Alkotast Hasznosito KFT and its parent company, subsidiaries, affiliated companies, and all of their members, shareholders, managers, executives, officers, board members, employees, agents, representatives, attorneys, and all other PERSONS acting on any of their respective behalves.

2. “BUBBA CLEM” means Bubba the Love Sponge Clem, as well as any agents, attorneys and consultants therefor, and all other PERSONS acting or purporting to act on his behalf.

3. “COMMUNICATION(S)” means any correspondence, contact, discussion, or exchange between any two or more PERSONS. Without limiting the foregoing, “COMMUNICATION(S)” includes all DOCUMENTS (as defined below), telephone conversations or face to face conversations, meetings and conferences.

4. “CONTROL” means the right to secure, or a reasonable likelihood of securing, the DOCUMENT or a copy thereof from another PERSON having actual physical possession thereof. If any DOCUMENT requested was, but is no longer in, YOUR possession or subject to YOUR CONTROL as defined herein, YOU are instructed to state what disposition was made of it and the date or dates, or approximate date or dates, on which such disposition was made.

5. “DAULERIO” means Defendant A.J. Daulerio, as well as any agents, attorneys and consultants therefor, and all other PERSONS acting or purporting to act on his behalf.

6. “DOCUMENT(S)” means all writings and recordings, including the originals and all non-identical copies, whether different from the original by reason of any notation made on such copies or otherwise (including but without limitation to, email and attachments, “instant” messages or “IM” messages, “wall” postings on Facebook, Myspace postings, Twitter postings or “tweets,” correspondence, memoranda, notes, diaries, minutes, statistics, letters, telegrams, contracts, reports, studies, checks, statements, tags, labels, invoices, brochures, periodicals, telegrams, receipts, returns, summaries, pamphlets, books, interoffice and intraoffice COMMUNICATIONS, offers, notations of any sort of conversations, working papers, applications, permits, file wrappers, indices, telephone calls, meetings or printouts, teletypes, telefax, invoices, worksheets, and all drafts, alterations, modifications, changes and amendments of any of the foregoing), graphic or aural representations of any kind (including without limitation, photographs, charts, microfiche, microfilm, videotape, recordings, motion pictures, plans, drawings, surveys), and electronic, mechanical, magnetic, optical or electric records or representations of any kind (including without limitation, computer files and programs, tapes, cassettes, discs, recordings), including metadata.

7. “GAWKER” means Defendant Gawker Media, LLC and its parent company, subsidiaries, affiliated companies, and all of their members, shareholders, managers, executives, officers, board members, employees, agents, representatives, attorneys, and all other PERSONS acting on behalf of any and all such PERSONS.

8. “GAWKER.COM” means the website located at www.gawker.com, as well as any agents, attorneys, and consultants therefor, and all other PERSONS acting or purporting to act on its behalf.

9. “HEATHER CLEM” means Defendant Heather Clem, the ex-wife of BUBBA CLEM (also known as Heather Cole), as well as any agents, attorneys and consultants therefor, and all other PERSONS acting or purporting to act on her behalf.

10. “IDENTIFY,” when used in reference to an individual, means to state his or her full name, present address, if known, telephone number, e-mail address, and present employment position and business affiliation. When used in reference to an entity, “IDENTIFY” means to state whether that entity is a corporation, partnership, limited liability company, limited liability partnership, or other organization, and the name, present and last known address of its principal place of business. “IDENTIFY,” when used in reference to a DOCUMENT, means to state the date, the author, the addressee, type of document, and any other means of identifying with sufficient particularity to meet the requirements for its inclusion in a request for production of documents pursuant to the Florida Rules of Civil Procedure.

11. “LAWSUIT” means the action currently pending before the Circuit Court of the Sixth Judicial Circuit, in and for Pinellas County, Florida, Case Number 12012477CI-011; the lawsuit that was pending in the United States District Court, Middle District of Florida, Tampa Division, Case Number 8:12-cv-02348-JDW-TBM; the lawsuit that was pending in the United States District Court, Middle District of Florida, Tampa Division, Case Number 8:13-cv-00001-T-JDW-AEP; and the lawsuit that was pending in the United States Court of Appeals for the Eleventh Circuit, Case Number 12-15959-C.

12. “PLAINTIFF” means Plaintiff Terry Gene Bollea, as well as any agents, attorneys and consultants therefor, and all other PERSONS acting or purporting to act on his behalf.

13. “PERSON” means any natural person, firm, partnership, association, proprietorship, joint venture, corporation, governmental agency, or other organization or legal or business entity, as well as any agents, attorneys and consultants therefor, and all other PERSONS acting or purporting to act on its behalf.

14. “POSTED NARRATIVE” means the story written by DAULERIO accompanying the “POSTED VIDEO” available at <http://gawker.com/5948770/even-for-a-minute-watching-hulk-hogan-have-sex-in-a-canopy-bed-is-not-safe-for-work-but-watch-it-anyway>.

15. “POSTED VIDEO” means the one minute forty-one second long video available at <http://gawker.com/5948770/even-for-a-minute-watching-hulk-hogan-have-sex-in-a-canopy-bed-is-not-safe-for-work-but-watch-it-anyway>.

16. “REFER TO” or “RELATE TO” means concerning, respecting, referring to, summarizing, digesting, embodying, reflecting, establishing, tending to establish, delegating from, tending not to establish, evidencing, not evidencing, comprising, connected with, commenting on, responding to, disagreeing with, showing, describing, analyzing, representing, constituting or including.

17. “SEX VIDEO” refers to any and all video footage of PLAINTIFF engaged in sexual activity with HEATHER CLEM, all excerpts therefrom, and all edited iterations thereof, including the POSTED VIDEO.

18. “WEBPAGE” shall mean the webpage located at <http://gawker.com/5948770/even-for-a-minute-watching-hulk-hogan-have-sex-in-a-canopy-bed-is-not-safe-for-work-but-watch-it-anyway>, which contains the “POSTED VIDEO” and “POSTED NARRATIVE” defined above.

19. Throughout this request, the singular shall include the plural and the plural shall include the singular.

20. The following terms should be read as if they were synonymous, and each should be taken to include the meaning of all of the others: related to, related in any manner to, concerning, referring to, alluding to, responding to, connected with, with respect to, commenting on, about, regarding, announcing, explaining, discussing, showing, describing, studying, reflecting, analyzing or constituting.

21. If you contend that it would be unreasonably burdensome to produce all the documents called for in response to any request, you should: produce all documents that are available without unreasonable burden; and describe with particularity the reasons why production of the remaining documents would be unreasonably burdensome.

22. In the event that any responsive document cannot be produced in its entirety, you are requested to produce the document to the fullest extent possible, specifying the reasons for your inability to produce the remainder and describing to the fullest extent possible the contents of the unproduced portion.

23. With respect to your responses to the following request for production, if any document or any portion of any document is withheld because of a claim of privilege, please state the basis for your claim of privilege with respect to such document or portion of any document and the specific ground(s) on which the claim of privilege rests, and

including, with respect to documents: the date appearing on the document, or if no date appears, the date on which the document was prepared; the name of the PERSON(s) to whom the document was addressed; the name of each PERSON, other than addressee(s), to whom the document, or a copy thereof, was sent or with whom the document was discussed; the name of the PERSON(s) who signed the document, or if not signed, the name of the PERSON(s) who prepared it; the name of each PERSON making any contribution to the authorship of the document; and the general nature or description of the document and the number of pages of which it consists.

24. In the event that any documents or things that would have been responsive to this request have been destroyed, discarded or lost, please identify each such document or thing, including: the nature of the document or thing; the author(s) and addressee(s) of any document; any indicated or blind copies of any document; the document's subject matter, number of pages and attachments or appendices; all PERSONS to whom the document was distributed or PERSONS who have seen the thing; the date of destruction, discard or loss; and, if destroyed or discarded, the reasons therefore and the identity of the PERSON(s) authorizing or carrying out any such destruction or discard.

25. A separate answer shall be furnished for each request.

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. All DOCUMENTS that RELATE TO the formation of KINJA.
2. All DOCUMENTS that RELATE TO the identity of the owners of KINJA.
3. DOCUMENTS sufficient to establish the state of incorporation and principal place of business of KINJA.
4. All DOCUMENTS that contain or constitute organization charts for KINJA, GAWKER, or any affiliates of GAWKER.
5. All DOCUMENTS that RELATE TO business and/or financial transactions of any kind between YOU and any other GAWKER entity, manager, officer, director, executive, or shareholder.
6. DOCUMENTS sufficient to show the line of business and/or types of business activities engaged in by YOU.
7. All DOCUMENTS that RELATE TO COMMUNICATIONS between YOU and any other GAWKER entity, manager, officer, director, executive, or shareholder.
8. All DOCUMENTS that RELATE TO shareholder distributions made by YOU.
9. DOCUMENTS sufficient to IDENTIFY YOUR shareholders, and the percentage share of KINJA owned by each shareholder.
10. DOCUMENTS sufficient to IDENTIFY the shareholders or owners of Gawker Media, LLC, and the percentage share of Gawker Media, LLC owned by each shareholder or owner.
11. All DOCUMENTS that RELATE TO COMMUNICATIONS between YOU and anyone in the United States.

12. All DOCUMENTS that RELATE TO any business transactions between YOU and anyone in the United States.
13. All DOCUMENTS that RELATE TO any movements of money between YOU and anyone in the United States.
14. All DOCUMENTS that show or identify a United States address and/or telephone number for YOU.
15. All versions, whether draft, final, proposed, or revised, of YOUR articles of incorporation.
16. All versions, whether draft, final, proposed, or revised, of YOUR by-laws.
17. All DOCUMENTS constituting or containing YOUR official minutes of meetings, corporate resolutions, board of directors resolutions, and/or shareholder resolutions.
18. All DOCUMENTS that RELATE TO the purpose of the formation of KINJA.
19. All DOCUMENTS that RELATE TO any direct or indirect contacts between KINJA and the United States.
20. All DOCUMENTS that RELATE TO any direct or indirect contacts between KINJA and the State of Florida.
21. All DOCUMENTS that mention KINJA and the LAWSUIT.
22. All DOCUMENTS that mention KINJA and the SEX VIDEO.
23. DOCUMENTS sufficient to establish the location, bank, and balance of each bank account in YOUR name.
24. DOCUMENTS sufficient to establish the location, financial institution, and balance of each account holding money or assets belonging to KINJA.

25. All DOCUMENTS that contain or constitute statements of account for any bank account or account holding money or assets belonging to KINJA.
26. DOCUMENTS establishing the capitalization and equity of each direct or indirect subsidiary of KINJA.
27. All DOCUMENTS that contain or constitute reports made to any government agency regarding the financial performance or condition of any GAWKER entity.
28. All DOCUMENTS that contain or constitute reports made to any government agency regarding any financial transaction between GAWKER entities.
29. All DOCUMENTS that contain or constitute financial statements for any GAWKER entity.
30. All DOCUMENTS which list any of the assets of KINJA.
31. DOCUMENTS sufficient to IDENTIFY every employee or independent contractor of KINJA.
32. All DOCUMENTS that RELATE TO any lawsuit (other than the LAWSUIT) filed against YOU in any court within the United States.
33. All DOCUMENTS that RELATE TO any lawsuit filed by YOU in any court within the United States.
34. All DOCUMENTS that RELATE TO any COMMUNICATIONS between KINJA and any government agency within the United States.
35. All DOCUMENTS that RELATE TO PLAINTIFF and which were created or are dated after January 1, 2012.
36. All DOCUMENTS that include the word(s) “Hogan,” “Hulk” or “Bollea” and which were created or are dated after January 1, 2012.

37. All audio and/or video recordings of PLAINTIFF.
38. All DOCUMENTS that RELATE TO audio and/or video recordings of PLAINTIFF.
39. All audio and/or video recordings of HEATHER CLEM.
40. All DOCUMENTS that RELATE TO audio and/or video recordings of HEATHER CLEM.
41. All audio and/or video recordings of BUBBA CLEM.
42. All DOCUMENTS that RELATE TO audio and/or video recordings of BUBBA CLEM.
43. The SEX VIDEO and all versions of it.
44. All excerpts of the SEX VIDEO prepared or generated by GAWKER, and all versions thereof, whether or not published.
45. All DOCUMENTS that RELATE TO the SEX VIDEO and all versions of it.
46. All DOCUMENTS that RELATE TO the POSTED VIDEO, including without limitation the preparation, editing, subtitling, posting and/or broadcast of the POSTED VIDEO.
47. All DOCUMENTS that RELATE TO the WEBPAGE.
48. All DOCUMENTS that RELATE TO internet traffic to, including page views of, the WEBPAGE.
49. All DOCUMENTS that REFER or RELATE TO YOUR record-keeping practices, including but not limited to intake notes, drafts of articles, revisions to articles, research, and memoranda.

50. All DOCUMENTS constituting handbooks, policies, manuals, educational materials, training materials, internal emails, internal memos, and internal letters, that RELATE TO any policies or practices of KINJA and/or GAWKER with respect to the privacy or publicity rights of subjects of GAWKER articles or postings.

51. All DOCUMENTS constituting handbooks, policies, manuals, educational materials, training materials, internal emails, internal memos, and internal letters, that RELATE TO any policies or practices of KINJA and/or GAWKER with respect to acquiring or receiving information used in articles, including but not limited to photographs, videos, songs, links, or other articles.

52. All DOCUMENTS constituting handbooks, policies, manuals, educational materials, training materials, internal emails, internal memos, and internal letters, that RELATE TO polices or practices of KINJA and/or GAWKER with respect to fact-checking articles or postings.

53. All DOCUMENTS constituting handbooks, policies, manuals, educational materials, training materials, internal emails, internal memos, and internal letters, that RELATE TO polices or practices of KINJA and/or GAWKER with respect to obtaining the consent of subjects of articles prior to publication.

54. All DOCUMENTS constituting handbooks, policies, manuals, educational materials, training materials, internal emails, internal memos, and internal letters, that RELATE TO polices or practices of KINJA and/or GAWKER with respect to copyright, trademark, right of publicity, or other intellectual property clearances.

55. All DOCUMENTS constituting handbooks, policies, manuals, educational materials, training materials, internal emails, internal memos, and internal letters, that

RELATE TO polices or practices of KINJA and/or GAWKER with respect to hidden camera footage, surveillance, voyeurism, eavesdropping and/or wiretapping laws.

56. All DOCUMENTS constituting handbooks, policies, manuals, educational materials, training materials, internal emails, internal memos, and internal letters, that RELATE TO polices or practices of KINJA and/or GAWKER with respect to the company's publishing decisions, including the company's decisions RELATING TO which articles are posted on GAWKER website(s).

57. All DOCUMENTS constituting handbooks, policies, manuals, educational materials, training materials, internal emails, internal memos, and internal letters, that RELATE TO KINJA's document preservation policies generally, including but not limited to document preservation notices.

58. All DOCUMENTS, including COMMUNICATIONS, that REFER or RELATE TO the LAWSUIT.

59. All DOCUMENTS, including COMMUNICATIONS, that REFER or RELATE TO the facts or alleged facts underlying each of the claims in the LAWSUIT.

60. All DOCUMENTS, including COMMUNICATIONS, that REFER or RELATE TO the facts or alleged facts underlying each of YOUR defenses to each of the claims in the LAWSUIT.

61. All DOCUMENTS that constitute, REFER or RELATE TO all cease and desist COMMUNICATIONS that YOU received from October 1, 2009 through the present that REFER TO publicity rights and/or privacy rights, including YOUR response to such cease and desist COMMUNICATIONS, and YOUR internal COMMUNICATIONS regarding same.

62. All DOCUMENTS that constitute, REFER or RELATE to all cease and desist COMMUNICATIONS that YOU received from October 1, 2009 through the present that REFER TO alleged copyright, trademark and/or other intellectual property violations, including YOUR response to such cease and desist COMMUNICATIONS, and YOUR internal COMMUNICATIONS regarding same.

63. All DOCUMENTS, including all COMMUNICATIONS, that REFER or RELATE TO any or all versions of the SEX VIDEO.

64. All DOCUMENTS, including all COMMUNICATIONS, that REFER or RELATE TO any or all versions of the POSTED VIDEO.

65. All DOCUMENTS that RELATE TO any and all decisions as to what content to include or not to include in the POSTED VIDEO.

66. All DOCUMENTS that RELATE TO any decision as to whether to block, obscure, or edit any explicit content in the POSTED VIDEO.

67. All DOCUMENTS that RELATE TO COMMUNICATIONS with advertisers and/or potential advertisers regarding the WEBPAGE.

68. All DOCUMENTS that RELATE TO COMMUNICATIONS with advertisers and/or potential advertisers regarding PLAINTIFF.

69. All DOCUMENTS that RELATE TO COMMUNICATIONS with advertisers and/or potential advertisers regarding HEATHER CLEM.

70. All DOCUMENTS that RELATE TO COMMUNICATIONS with advertisers and/or potential advertisers regarding BUBBA CLEM.

71. All DOCUMENTS that RELATE TO COMMUNICATIONS with advertisers and/or potential advertisers regarding the LAWSUIT.

72. All DOCUMENTS that RELATE TO any standards for posting content at GAWKER.COM.
73. All DOCUMENTS that RELATE TO any standards for posting content at any and/or all GAWKER websites.
74. All DOCUMENTS that RELATE TO the source or origin of the SEX VIDEO.
75. All DOCUMENTS that RELATE TO GAWKER's acquisition of the SEX VIDEO.
76. All DOCUMENTS that RELATE TO the consideration paid by GAWKER or offered by GAWKER or requested to be paid by GAWKER to acquire the SEX VIDEO.
77. All DOCUMENTS that RELATE TO negotiations surrounding GAWKER's acquisition of the SEX VIDEO.
78. All DOCUMENTS that RELATE TO the SEX VIDEO being offered for sale prior to October 4, 2012.
79. All DOCUMENTS that RELATE TO YOUR contention that the WEBPAGE or any portion of it, including the POSTED VIDEO, is a matter of legitimate public concern.
80. All DOCUMENTS that RELATE TO YOUR contention that YOU acted in good faith and had a reasonable belief that the WEBPAGE was legally permissible and not actionable.
81. All DOCUMENTS that RELATE TO YOUR contention that YOU acted in good faith and had a reasonable belief that YOUR posting of the POSTED VIDEO was legally permissible and not actionable.

82. All DOCUMENTS that RELATE TO whether PLAINTIFF had any knowledge that the SEX VIDEO was being recorded at the time of the recording of the SEX VIDEO.
83. All DOCUMENTS that RELATE TO whether PLAINTIFF consented to the recording of the SEX VIDEO.
84. All DOCUMENTS that RELATE TO whether PLAINTIFF consented to the posting of the POSTED VIDEO.
85. All DOCUMENTS that RELATE TO whether PLAINTIFF consented to the posting of any portion of the WEBPAGE.
86. All DOCUMENTS that RELATE TO any attempt made by YOU to determine if PLAINTIFF consented to the recording of the SEX VIDEO.
87. All DOCUMENTS that RELATE TO any attempt made by YOU to determine if PLAINTIFF consented to the posting of the POSTED VIDEO.
88. All DOCUMENTS that RELATE TO any attempt made by YOU to determine if PLAINTIFF consented to the posting of any portion of the WEBPAGE.
89. All DOCUMENTS that constitute and RELATE TO all cease and desist COMMUNICATIONS between GAWKER and PLAINTIFF.
90. All DOCUMENTS that constitute and/or RELATE TO any and all COMMUNICATIONS between YOU and HEATHER CLEM.
91. All DOCUMENTS that constitute and/or RELATE TO any and all COMMUNICATIONS between YOU and BUBBA CLEM.
92. All DOCUMENTS that constitute and/or RELATE TO any and all COMMUNICATIONS regarding the WEBPAGE.

93. All DOCUMENTS that RELATE TO whether HEATHER CLEM had any knowledge that the SEX VIDEO was being recorded at the time of the recording of the VIDEO.
94. All DOCUMENTS that RELATE TO whether HEATHER CLEM consented to the recording of the SEX VIDEO.
95. All DOCUMENTS that RELATE TO whether HEATHER CLEM consented to the posting of the POSTED VIDEO.
96. All DOCUMENTS that RELATE TO whether HEATHER CLEM consented to the posting of any portion of the WEBPAGE.
97. All DOCUMENTS that RELATE TO any attempt made by YOU to determine if HEATHER CLEM consented to the recording of the SEX VIDEO.
98. All DOCUMENTS that RELATE TO any attempt made by YOU to determine if HEATHER CLEM consented to the posting of the POSTED VIDEO.
99. All DOCUMENTS that RELATE TO any attempt made by YOU to determine if HEATHER CLEM consented to the posting of any portion of the WEBPAGE.
100. All DOCUMENTS that RELATE TO any attempt made by YOU to determine who held the copyright in the SEX VIDEO before the WEBPAGE was posted on GAWKER.COM on or about October 4, 2012.
101. All DOCUMENTS that RELATE TO any attempt made by YOU to confirm the authenticity of the SEX VIDEO before the WEBPAGE was posted on GAWKER.COM on or about October 4, 2012.

102. All DOCUMENTS that RELATE TO any attempt made by YOU to confirm the identity of any of the participants in the SEX VIDEO before the WEBPAGE was posted on GAWKER.COM on or about October 4, 2012.
103. All DOCUMENTS that support YOUR contention that the PERSONS depicted in the VIDEO are PLAINTIFF and HEATHER CLEM.
104. All DOCUMENTS that YOU relied on in making a good faith determination that posting the WEBPAGE, including the POSTED VIDEO, was legal.
105. All DOCUMENTS that YOU relied on in making a good faith determination that posting THE WEBPAGE, including the POSTED VIDEO, was not tortious.
106. A complete copy of each of YOUR insurance policies that cover, or might cover, one or more claims in the operative Complaint in the captioned lawsuit.
107. All DOCUMENTS constituting communications between YOU and any insurance company regarding coverage or potential coverage for this lawsuit.
108. All DOCUMENTS that constitute, REFER or RELATE TO all COMMUNICATIONS that YOU received from October 1, 2009 through the present that request the removal of photos, video or other content containing nudity and/or sexual content, including YOUR response to such take down COMMUNICATIONS, and YOUR internal COMMUNICATIONS regarding same.
109. All DOCUMENTS, including COMMUNICATIONS, created from January 1, 2010, through the present that REFER or RELATE TO the posting on Deadspin.com entitled “Bathroom Sex Pandemic Reaches The Damp Floor Of Indiana Sports Bar,” and which was later changed to “Bathroom Sex Pandemic Reaches The Damp Floor Of Indiana Sports Bar (UPDATE),” or the underlying events described therein.

110. All DOCUMENTS which constitute, contain, or RELATE TO license agreements between KINJA and GAWKER or any of its affiliated companies or officers, directors, managers, or employees, or to the negotiation or drafting of any terms of any such agreements.

111. All DOCUMENTS which constitute, contain, or RELATE TO agreements between KINJA and any other person or entity which concern the licensing of intellectual property, or to the negotiation or drafting of any terms of such agreements.

112. All DOCUMENTS comprising or containing registrations with any governmental agency of intellectual property held by, owned by, or licensed to KINJA.

113. All DOCUMENTS which describe the nature, function, or use of any intellectual property developed, owned by, licensed to, or held by KINJA.

114. All DOCUMENTS which RELATE TO business activities conducted by KINJA in New York City.

115. All DOCUMENTS which RELATE TO business activities conducted by KINJA in Hungary.

116. All DOCUMENTS which RELATE TO any tangible or intangible benefit(s) received by GAWKER resulting or flowing from any asset or activity of KINJA.

DATED: May 1, 2014

/s/ Charles J. Harder
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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by E-Mail via the Florida E-Portal system this 1st day of May, 2014 to the following:

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/s/ Kenneth G. Turkel
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