

EXHIBIT A
(to Plaintiff's Second Amended Notice of Hearing)

THOMAS &
LOCICERO

Tampa

601 South Boulevard, Tampa, FL 33606
ph 813-984-3060 fax 813-984-3070 toll free 866-395-7100

South Florida

401 SE 12th Street, Ste. 300, Fort Lauderdale, FL 33316
ph 954-703-3416 fax 954-400-5415

8461 Lake Worth Road, Ste. 114, Lake Worth, FL 33467
ph 561-340-1433 fax 561-340-1432

www.tlolawfirm.com

Gregg D. Thomas
Direct Dial: (813) 984-3066
gthomas@tlolawfirm.com

Reply to: Tampa

June 26, 2015

VIA HAND DELIVERY

The Honorable Pamela A.M. Campbell
Sixth Judicial Circuit
St. Petersburg Judicial Building
545 First Avenue N., Room 300
St. Petersburg, FL 33701

Re: Terry Gene Bollea v. Gawker Media, LLC, et al.
Case No.: 8:12-cv-02348-JDW-TBM

Dear Judge Campbell:

Enclosed for your review, in advance of Monday's hearing, is the Publisher Defendants' Opposition to Plaintiff's Motion to Compel Additional Financial Worth Discovery, plus exhibits. (Plaintiff's motion was filed Monday afternoon, June 22, 2015.) Also enclosed is a binder containing much of the financial worth discovery that the Publisher Defendants have provided in this case.

Thank you for your attention.

Sincerely,

THOMAS & LOCICERO PL



Gregg D. Thomas

Enclosures

cc: Counsel of Records (cover letter and binder index only)

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA

TERRY GENE BOLLEA professionally
known as HULK HOGAN,

Plaintiff,

Case No.: 12012447-CI-011

vs.

HEATHER CLEM; GAWKER MEDIA,
LLC aka GAWKER MEDIA; et al.,

Defendants.

THE PUBLISHER DEFENDANTS' FINANCIAL WORTH DISCLOSURES

Description	Tab
Gawker's income statements for every year since 2011, plus for the period January through April 2015 [Gawker 18323, 28223-28224]	1
Gawker's balance sheets for every year since 2011, plus for the period January through April 2015 [Gawker 1432, 1433, 18320, 28225-28227]	2
Gawker's statements of cash flow for every year since 2011, plus for the period January through April 2015 [Gawker 28229 - 28233]	3
Gawker's statement of accounts receivable [Gawker 28234]	4
All of Gawker's federal tax returns since 2011 [Gawker 28512-28559]	5
All of Nick Denton's federal tax returns since 2011 [Denton 068-103, 321-377]	6
All of A.J. Daulerio's available federal tax returns since 2011 [AJD 039-55]	7
All available W2 forms for Nick Denton and A.J. Daulerio since 2011 [Gawker 28501-28511]	8

Valuation reports of Gawker Media Group, Inc. ("GMGI"), by The Brenner Group, from 2012, 2013, and 2014, plus exhibits [Denton 104-320]	9
Financial statements of GMGI audited and/or reviewed by CPA firm of Citrin Cooperman for 2011, 2012 and 2013 [Gawker 24348-24388]	10
Capitalization table showing ownership interests in GMGI [Denton 104]	11
Capitalization table showing ownership interests in RFree, Inc., the start-up web publishing company recently founded by A.J. Daulerio [AJD 069]	12
Gawker's leases [Gawker 28238 – 28480]	13
Independent appraisal of Nick Denton's condominium [Denton 029-67]	14
Mortgage statement for Nick Denton [Denton 007]	15
Bank statements for each of the Publisher Defendants (most recent statements, plus end-of-year account statements for each year available back to 2011) [Gawker 28657 – 28741] [Denton 016-028] [AJD 56-60, 66-68]	16
Stock certificates showing investments [Gawker 28756 – 28759] [AJD 061-65]	17
Bank statements showing payments between Gawker and Kinja, KFT [Gawker 24389 – 24398]	18
Gawker's operating agreement [Gawker 28481 – 28487]	19
Gawker's promissory notes and loan statement [Gawker 28742 – 28755]	20