

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'S REQUESTS FOR PRODUCTION OF DOCUMENTS
CONCERNING NET WORTH
TO DEFENDANT NICK DENTON**

Pursuant to Florida Rules of Civil Procedure 1.350, Plaintiff Terry Gene Bollea, professionally known as Hulk Hogan ("PLAINTIFF"), hereby requests that Defendant Nick Denton 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 through 92 within thirty days from the certificate of service.

Definitions and Instructions

As used in this Request for Production of Documents:

1. “YOU” or “YOUR” or “DENTON” means Defendant NICK DENTON and all agents, representatives, attorneys, and all other PERSONS acting on his behalf.
2. “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.
3. “DAULERIO” means Defendant AJ Daulerio and all agents, representatives, attorneys, and all other PERSONS acting on his behalf.
4. “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.

5. “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.

6. “GMGI” means Gawker Media Group, Inc. and its members, shareholders, managers, executives, officers, board members, employees, agents, representatives, attorneys, and all other PERSONS acting on any of their respective behalves.

7. “KINJA” means Kinja KFT and its members, shareholders, managers, executives, officers, board members, employees, agents, representatives, attorneys, and all other PERSONS acting on any of their respective behalves.

8. “LAWSUIT” means the action currently pending before the Circuit Court of the Sixth Judicial Circuit, in and for Pinellas County, Florida, Case Number 12012447CI-011.

9. “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.

10. “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.

11. “REFER(S) TO” or “RELATE(S) TO” means concerning, respecting, referring to, summarizing, digesting, embodying, reflecting, establishing, tending to establish, tending not to establish, evidencing, not evidencing, comprising, connected with, commenting on,

responding to, disagreeing with, showing, describing, analyzing, representing, constituting or including.

12. In the event any request herein calls for information or for the identification of a DOCUMENT which you deem to be privileged, in whole or in part, the information should be given or the DOCUMENT identified to the fullest extent possible consistent with such claim of privilege, and you should state the nature of the privilege claimed and specify the grounds relied upon for the claim of privilege.

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

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. All DOCUMENTS which identify YOUR actual net worth for each fiscal year beginning January 1, 2011 to the time of the response to this Request.
2. All DOCUMENTS which identify YOUR estimated net worth for each fiscal year beginning January 1, 2011 to the time of the response to this Request.
3. All DOCUMENTS REFERRING or RELATING TO the fair value and/or fair market value of any and all of YOUR assets (including, without limitation, stocks, bonds, certificates of deposit (CDs), cash, precious metals, gemstones, commodities, business inventory, accounts receivable, personal property, vehicles, aircraft, vessels, furniture, furnishings, computers, computer equipment, servers, electronic equipment, works of art, jewelry, antiques or collectibles, appliances, tools, photographic equipment, musical instruments, rare books, silver or china, pets, and similar items) for the period beginning January 1, 2011, to the time of the response to this Request.
4. All DOCUMENTS REFERRING or RELATING TO the ownership of any and all of YOUR assets (including, without limitation, stocks, bonds, certificates of deposit (CDs), cash, precious metals, gemstones, commodities, business inventory, accounts receivable, personal property, vehicles, aircraft, vessels, furniture, furnishings, computers, computer equipment, servers, electronic equipment, works of art, jewelry, antiques or collectibles, appliances, tools, photographic equipment, musical instruments, rare books, silver or china, pets, and similar items) for the period beginning January 1, 2011, to the time of the response to this Request.
5. Copies of any and all DOCUMENTS utilized or reviewed in the formulation of any and all answers to any interrogatory served by PLAINTIFF contemporaneously herewith,

which demand information regarding any aspect of YOUR finances, including without limitation YOUR income and expenses.

6. DOCUMENTS sufficient to show all compensation earned by YOU during the period beginning January 1, 2011, until the time of the response to the Request, including but not limited to wages, salary, profit sharing, bonuses, and/or financial performance incentives.

7. Copies of DOCUMENTS sufficient to show whether YOU (whether acting for yourself or on behalf of GAWKER, KINJA or GMGI), at any time since 2011, have given or been given consideration for any property or other asset which has been conveyed or transferred and is now being held in the name of some PERSON or ENTITY other than YOU.

8. Copies of DOCUMENTS sufficient to show whether YOU (whether acting for yourself or on behalf of GAWKER, KINJA or GMGI), have sold, conveyed, traded or transferred any of YOUR assets, (including, without limitation, stocks, bonds, certificates of deposit (CDs), cash, precious metals, gemstones, commodities, business inventory, accounts receivable, personal property, vehicles, aircraft, vessels, furniture, furnishings, computers, computer equipment, servers, electronic equipment, works of art, jewelry, antiques or collectibles, appliances, tools, photographic equipment, musical instruments, rare books, silver or china, pets, and similar items), including any of YOUR accounts or any of YOUR book of business, since January 1, 2011, including copies of any and all contracts, which relate to any such conveyed, traded, or transferred assets.

9. DOCUMENTS sufficient to show whether YOU (whether acting for yourself or on behalf of GAWKER, KINJA or GMGI), have been party to any contract, or any other agreement, whereby YOU granted an option to anyone to purchase any or all of YOUR assets, (including, without limitation, stocks, bonds, certificates of deposit (CDs), cash, precious metals,

gemstones, commodities, business inventory, accounts receivable, personal property, vehicles, aircraft, vessels, furniture, furnishings, computers, computer equipment, servers, electronic equipment, works of art, jewelry, antiques or collectibles, appliances, tools, photographic equipment, musical instruments, rare books, silver or china, pets, and similar items) from January 1, 2011 to the time of the response to this Request, including copies of any and all such contracts.

10. DOCUMENTS sufficient to show the location of all bank accounts owned by YOU from January 1, 2011 through the time of the response to this Request, including at both foreign and domestic institutions, the account number(s) and the present balance(s) of the accounts.

11. For the time period beginning January 1, 2011, to the time of the response to this Request, all DOCUMENTS constituting bank statements and/or statements from any other type of financial institution for accounts held by YOU, whether acting for yourself or on behalf of GAWKER, KINJA or GMGI.

12. All DOCUMENTS constituting brokerage records, account statements, investment account records, or other similar records showing any form of investments including, but not limited to, securities, bonds and cash holdings, held by YOU, whether acting for yourself or on behalf of GAWKER, KINJA or GMGI, for the time period beginning January 1, 2011, to the time of the response to this Request.

13. For the time period beginning January 1, 2011, to the time of the response to this Request, any and all DOCUMENTS constituting account statements from any creditor of any kind including, but not limited to, mortgage holders, landlords, banks extending working capital,

banks extending any form of credit, or any other ENTITY extending any form of credit to YOU, whether acting for yourself or on behalf of GAWKER, KINJA or GMGI.

14. Copies of all YOUR financial statements and all schedules or lists of YOUR assets and liabilities, which were prepared for or on YOUR behalf, since January 1, 2011.

15. DOCUMENTS sufficient to show the location of any of YOUR current assets.

16. Copies of all DOCUMENTS which identify the present amount of YOUR accounts receivables.

17. Copies of DOCUMENTS which show whether any of YOUR accounts receivables have been assigned or otherwise disposed of (other than by payment by the debtor or collection from the debtor) from January 1, 2011 through the time of the response to this Request.

18. Copies of any and all of YOUR financial “books” and/or any other written or electronic data or DOCUMENTS (including, without limitation, QuickBooks or other accounting software files), whether maintained by YOU, or any third party on YOUR behalf, which contain information concerning YOUR income and expenses from January 1, 2011 to the time of the response to this Request.

19. DOCUMENTS sufficient to show all income received by YOU, for each fiscal year covering January 1, 2011 to the present, including without limitation, any and all corporate balance sheets, ledgers and/or accounting statements. Plaintiff is not seeking DOCUMENTS from each and every individual account YOU hold but is seeking information which identifies YOUR income as a whole for each year from 2011 to the present.

20. Copies of YOUR cash receipt journal for the time period beginning January 1, 2011 through the time of the response to this Request.

21. Copies of YOUR deposit slips for each bank account from January 1, 2011, through the time of the response to this Request.

22. Copies of any and all DOCUMENTS sufficient to identify all of YOUR liabilities, debts, and other obligations, incurred since January 1, 2011.

23. Copies of any and all DOCUMENTS sufficient to identify whether any item of YOUR real property, personal property or other assets has been pledged to secure any debt since January 1, 2011.

24. DOCUMENTS sufficient to show any and all loans and/or indebtedness held by YOU, for yourself personally and/or on behalf of GAWKER, KINJA or GMGI, for the time period beginning January 1, 2011, to the time of the response to this Request, including DOCUMENTS sufficient to show the value and/or amount of the loan(s) or debt(s) and the terms, including without limitation the rate(s) of interest and repayment schedule(s), of same.

25. All DOCUMENTS that constitute applications made by YOU, for yourself personally and/or on behalf of GAWKER, KINJA or GMGI, for loans, leases, lines of credit, credit cards, working capital or any other form of credit, for the time period beginning January 1, 2011, to the time of the response to this Request, including any DOCUMENTS submitted in connection with such applications.

26. For the time period beginning January 1, 2011, to the time of the response to this Request, all DOCUMENTS RELATING TO or reflecting the existence or location of any mortgages, promissory notes, deeds, security instruments and/or title certificates showing or tending to show the existence of debts owed to, property owned by, or property in which YOU have a security interest.

27. Copies of all DOCUMENTS filed with the Internal Revenue Service, whether filed by YOU or on YOUR behalf, for each calendar year beginning January 1, 2011 through the time of the response to this Request.

28. For the tax years 2011–2014, signed authorization forms allowing Plaintiff's attorneys to obtain copies of YOUR tax returns from the IRS, including all schedules and attachments (copies of which are attached as Exhibit A).

29. Copies of all DOCUMENTS filed with the governmental body responsible for taxation in any foreign country, whether filed by YOU or on YOUR behalf, for each calendar year beginning January 1, 2011, through the time of the response to this request.

30. For the time period beginning January 1, 2011, to the time of the response to this Request, all DOCUMENTS RELATING TO or reflecting the existence or location of interests (including without limitation any ownership interests) YOU may have or had in any partnerships, corporations, limited liability corporations, holding companies or other ENTITY.

31. DOCUMENTS sufficient to show whether YOU have ever owned or currently own any stocks, bonds, shares, or other securities of any class in any government, governmental organization, company, firm, partnership, corporation or ENTITY whether foreign or domestic, from January 1, 2011 to the present date, including DOCUMENTS sufficient to identify the amount and/or fair value and/or fair market value of any such stocks, bonds, shares, or other securities.

32. DOCUMENTS sufficient to show whether YOU maintain the right to bring any action against another PERSON or ENTITY to recover a debt, security interest or money, and DOCUMENTS sufficient to show whether YOU are currently involved in an action against any other PERSON or ENTITY to recover a debt, security interest or money.

33. For the time period beginning January 1, 2011, to the time of the response to this Request, any DOCUMENTS RELATING TO or reflecting the existence or location of any pensions, profit sharing, annuities or trusts in which YOU have any interest.

34. For the time period beginning January 1, 2011, to the time of the response to this Request, any and all DOCUMENTS showing any and all ownership and/or other interests YOU hold, for yourself personally and/or on behalf of GAWKER, KINJA or GMGI, in real estate (including both ownership and leasehold interests), any interests in other businesses, and/or any other form of investment, including without limitation DOCUMENTS sufficient to show the fair value and/or fair market value or worth of any and all such interests.

35. All DOCUMENTS REFERRING or RELATING TO any real property leased to or from YOU (individually, jointly, or otherwise), for yourself personally and/or on behalf of GAWKER, KINJA or GMGI, during any part of the period of January 1, 2011 to the time of the response of this Request, including DOCUMENTS sufficient to show the terms of all such leases, the location of the property(ies), the amount of rent paid, the owner of the property(ies) and the duration of the lease(s).

36. DOCUMENTS sufficient to show any and all ownership interests YOU hold (individually, jointly, or otherwise, for yourself personally and/or on behalf of GAWKER, KINJA or GMGI) in any and all real property from January 1, 2011 to the time of the response to this Request, including but not limited to, copies of any and all titles and/or deeds regarding such real property, and all DOCUMENTS stating and/or estimating the fair value and/or fair market value of any and all such real property.

37. DOCUMENTS sufficient to show whether any real property owned by YOU (either individually, jointly, or otherwise, for yourself personally and/or on behalf of GAWKER,

KINJA or GMGI) is encumbered by either a real estate mortgage, chattel mortgage, or any other type of lien including, but not limited to, copies of any and all mortgages, promissory notes and/or liens.

38. Copies of YOUR rent roll, rent ledgers, or other DOCUMENT that reflects the rent each vendor paid from January 1, 2011 to the time of the response to this Request.

39. All DOCUMENTS RELATING TO or reflecting the type, make, model, existence or location and fair value and/or fair market value of any motor vehicles, vessels, aircraft or motorcycles in which YOU have held an ownership interest, for yourself personally and/or on behalf of GAWKER, KINJA or GMGI, for the time period beginning January 1, 2011, to the time of the response to this Request.

40. Any DOCUMENT constituting an appraisal of any asset owned by YOU or which YOU currently have the right to use under any contractual agreement.

41. DOCUMENTS sufficient to show whether YOU, for yourself personally and/or on behalf of GAWKER, KINJA or GMGI, have owned any interest in any kind of patent, copyright, trademark, tradename, trade secrets, inventions, formulas, domain names, websites, blogs, social media accounts and/or other intellectual property from 2007 to the time of the response to this Request including, but not limited to, applications for patents, copyrights, trademark, tradename or other intellectual property, certificates and/or registration papers for the patents, copyrights, trademark, tradename, trade secrets, inventions, formulas, domain names, websites, blogs, social media accounts and/or other intellectual property and DOCUMENTS which will show the amount of income received from the patent, copyright, trademark, tradename, trade secrets, inventions, formulas, domain names, websites, blogs, social media accounts and/or other intellectual property from 2007 to the time of the response to this Request.

42. Copies of all trusts in which YOU, yourself personally and/or on behalf of GAWKER, KINJA or GMGI, are or were the grantor, settlor, trustee, beneficiary or in which YOU have or had any interest, legal or equitable, at any time from January 1, 2011, until the time of the response to the Request.

43. Copies of any testamentary documents which may govern the disposition of YOUR assets upon YOUR demise including, without limitation, wills and testamentary trusts.

44. Copies of any prenuptial agreements to which YOU are a party.

45. Copies of any currency, stock certificates or other DOCUMENTS or items YOU keep in a safe or similar apparatus, regardless of the location of such safe or apparatus for yourself personally and/or on behalf of GAWKER, KINJA or GMGI.

46. All DOCUMENTS showing the source of funds YOU have used to pay any monthly expenses since January 1, 2011.

47. All DOCUMENTS showing any on-line auctions or other purchases or sales of any property valued at more than \$1,000 in which YOU have participated since 2011.

48. For the time period beginning January 1, 2011, to the time of the response to this Request, all DOCUMENTS REFERRING or RELATING TO the finances of GAWKER, including without limitation all articles (print media and/or online), emails, internal memos, monthly reports, financial reports and/or financial statements.

49. For the time period beginning January 1, 2011, to the time of the response to this Request, all DOCUMENTS REFERRING or RELATING TO the revenue streams and/or income of GAWKER, including without limitation all articles (print media and/or online), emails, internal memos, monthly reports, financial reports and/or financial statements.

50. For the time period beginning January 1, 2011, to the time of the response to this Request, all DOCUMENTS REFERRING or RELATING TO the current net worth of GAWKER, including without limitation all articles (print media and/or online), emails, internal memos, monthly reports, financial reports and/or financial statements.

51. DOCUMENTS sufficient to show the location of all bank accounts owned by GAWKER from 2011 through the time of the response to this Request.

52. All DOCUMENTS REFERRING or RELATING TO any real property owned by GAWKER (individually, jointly or otherwise) from January 1, 2011, to the time of the response to this Request, including but not limited to, copies of any and all titles and/or deeds regarding such property, and all DOCUMENTS sufficient to show the location of the property, all purchasing terms, the amount paid for the purchase of the property, the details of any mortgage or lien on the property and the current fair value and/or fair market value of the property (whether actual or estimated).

53. All DOCUMENTS REFERRING or RELATING TO any real property leased to GAWKER (individually, jointly or otherwise) during any part of the period from January 1, 2011, to the time of the response to this Request, including DOCUMENTS sufficient to show the location of the property, all lease terms, the amount of rent paid, the owner of the property and the duration of the lease.

54. Copies of all DOCUMENTS filed by GAWKER with any domestic or foreign governmental body responsible for taxation, including without limitation the Internal Revenue Service, whether filed by or on behalf of KINJA, for each calendar year beginning January 1, 2011, through the time of the response to this request.

55. All DOCUMENTS that reflect ownership interest in GAWKER, from January 1, 2011 through the time of the response to this Request.

56. All contracts, agreements, ledgers, cancelled checks or other DOCUMENTS showing the purchase or sale of any ownership interest in GAWKER for the time period beginning January 1, 2011 through the time of the response to this Request.

57. Copies of GAWKER's original membership agreement and Articles of Incorporation, as well as any amendments thereto.

58. Copies of GAWKER's Articles of Incorporation and membership agreements, which were in existence on October 4, 2012.

59. Copies of GAWKER's current Articles of Incorporation and membership agreements.

60. Copies any and all DOCUMENTS that identify each and every member, managing member, officer, owner, executive, shareholder and/or director of GAWKER, from January 1, 2011, to the time of the response to this Request, including DOCUMENTS that identify each and every position the individual held, the dates of service for each position held by an individual, and the amount of compensation paid in any form to each.

61. For the time period beginning January 1, 2011, to the time of the response to this Request, any and all shareholders agreements, partner's agreements, operating agreements or similar contracts relating to any business or company affiliated with or related to GAWKER, that in any way show the amount or fair value and/or fair market value of any ownership interest in GAWKER or its related or affiliated businesses or companies.

62. Copies of correspondence, reports, or other DOCUMENTS which have been sent to GAWKER's members, owners, lenders, creditors, parent companies, holding companies,

shareholders, corporate directors, corporate officers, managers, managing members and/or employees, from January 1, 2011 to the time of the response to this Request, concerning the net worth of GAWKER, the income and revenue received by GAWKER and/or the expenses and liabilities of GAWKER.

63. For the time period beginning January 1, 2011, to the time of the response to this Request, any and all shareholder, member or ownership memos, emails, financial reports, distribution statements or similar DOCUMENTS of any nature, including, without limitation, cash flow statements, balance sheets (assets/liabilities), subsidiary ledgers, accounts payable and receivable, profit and loss statements, and annual reports for GAWKER.

64. Copies of any and all of GAWKER's annual financial reports and/or other year-end reports which were sent to members, owners, lenders, creditors, shareholders and/or GAWKER's officers, directors, principals, managers, or managing members for each fiscal year covering January 1, 2011 to the time of the response to this Request.

65. DOCUMENTS sufficient to show whether there have been any parent, sister, or subsidiary corporations of GAWKER, from January 1, 2007 through the time of the response to this Request.

66. DOCUMENTS sufficient to show the date of incorporation for each parent, sister, or subsidiary corporation of GAWKER, the state or country of incorporation for each such ENTITY, each ENTITY's members, managing members, owners, officers and directors for each fiscal year from January 1, 2011 to the time of the response to this Request, and whether GAWKER maintains any ownership interest in any such ENTITY, including the percentage of the ownership interest.

67. Copies of the original Articles of Incorporation, membership agreements, Articles of Incorporation which were in existence on October 4, 2012, and current Articles of Incorporation for any and all of GAWKER's parent and subsidiary corporations, as well as any amendments thereto.

68. DOCUMENTS sufficient to show whether GAWKER has been sold to, merged or consolidated with any other ENTITY since 2011. Please include copies of all contracts and/or agreements, which relate to any sale, merger, or consolidation.

69. If GAWKER has been sold, merged or consolidated with any other ENTITY since 2011, please provide copies of any and all DOCUMENTS sufficient to identify whether the purchasing, merging, or consolidating ENTITY ever agreed to assume the liabilities of GAWKER, as well as the price paid as part of any such transaction.

70. If GAWKER has been sold, merged or consolidated with any other ENTITY since 2011, please provide copies of any and all DOCUMENTS sufficient to identify whether the purchasing, merging, or consolidating ENTITY ever actually assumed any liability for any claim against GAWKER.

71. Copies of all of GAWKER's filings with the Security Exchange Commission from January 1, 2011 to the time of the response to this Request, if any.

72. Copies of all DOCUMENTS filed with the Internal Revenue Service, whether filed by or on behalf of GAWKER, for each calendar year beginning January 1, 2011 through the time of the response to this Request.

73. All DOCUMENTS relating to any insurance policies providing coverage for any real property, personal property or keyman for GAWKER since 2011.

74. For the time period beginning January 1, 2011, to the time of the response to this Request, all DOCUMENTS REFERRING or RELATING TO the finances of KINJA, including without limitation all articles (print media and/or online), emails, internal memos, monthly reports, financial reports and/or financial statements.

75. For the time period beginning January 1, 2011, to the time of the response to this Request, all DOCUMENTS REFERRING or RELATING TO the revenue streams and/or income of KINJA, including without limitation all articles (print media and/or online), emails, internal memos, monthly reports, financial reports and/or financial statements.

76. For the time period beginning January 1, 2011, to the time of the response to this Request, all DOCUMENTS REFERRING or RELATING TO the current net worth of KINJA, including without limitation all articles (print media and/or online), emails, internal memos, monthly reports, financial reports and/or financial statements.

77. DOCUMENTS sufficient to show the location of all bank accounts owned by KINJA from 2011 through the time of the response to this Request.

78. All DOCUMENTS REFERRING or RELATING TO any real property owned by KINJA (individually, jointly or otherwise) from January 1, 2011, to the time of the response to this Request, including but not limited to, copies of any and all titles and/or deeds regarding such property, and all DOCUMENTS sufficient to show the location of the property, all purchasing terms, the amount paid for the purchase of the property, the details of any mortgage or lien on the property and the current fair value and/or fair market value of the property (whether actual or estimated).

79. All DOCUMENTS REFERRING or RELATING TO any real property leased to KINJA (individually, jointly or otherwise) during any part of the period from January 1, 2011, to

the time of the response to this Request, including DOCUMENTS sufficient to show the location of the property, all lease terms, the amount of rent paid, the owner of the property and the duration of the lease.

80. Copies of all DOCUMENTS filed by KINJA with any domestic or foreign governmental body responsible for taxation, including without limitation the Internal Revenue Service, whether filed by or on behalf of KINJA, for each calendar year beginning January 1, 2011, through the time of the response to this request.

81. For the time period beginning January 1, 2011, to the time of the response to this Request, all DOCUMENTS REFERRING or RELATING TO the finances of GMGI, including without limitation all articles (print media and/or online), emails, internal memos, monthly reports, financial reports and/or financial statements.

82. For the time period beginning January 1, 2011, to the time of the response to this Request, all DOCUMENTS REFERRING or RELATING TO the revenue streams and/or income of GMGI, including without limitation all articles (print media and/or online), emails, internal memos, monthly reports, financial reports and/or financial statements.

83. For the time period beginning January 1, 2011, to the time of the response to this Request, all DOCUMENTS REFERRING or RELATING TO the current net worth of GMGI, including without limitation all articles (print media and/or online), emails, internal memos, monthly reports, financial reports and/or financial statements.

84. DOCUMENTS sufficient to show the location of all bank accounts owned by GMGI from 2011 through the time of the response to this Request,

85. All DOCUMENTS REFERRING or RELATING TO any real property owned by GMGI (individually, jointly or otherwise) from January 1, 2011, to the time of the response to

this Request, including but not limited to, copies of any and all titles and/or deeds regarding such property, and all DOCUMENTS sufficient to show the location of the property, all purchasing terms, the amount paid for the purchase of the property, the details of any mortgage or lien on the property and the current fair value and/or fair market value of the property (whether actual or estimated).

86. All DOCUMENTS REFERRING or RELATING TO any real property leased to GMGI (individually, jointly or otherwise) during any part of the period from January 1, 2011, to the time of the response to this Request, including DOCUMENTS sufficient to show the location of the property, all lease terms, the amount of rent paid, the owner of the property and the duration of the lease.

87. Copies of all DOCUMENTS filed by GMGI with any domestic or foreign governmental body responsible for taxation, including without limitation the Internal Revenue Service, whether filed by or on behalf of GMGI, for each calendar year beginning January 1, 2011, through the time of the response to this request.

88. DOCUMENTS sufficient to show all financial transactions, transfers, payments, and/or movement of money, assets, or liabilities between or amongst KINJA, YOU, GMGI and/or GAWKER, from January 1, 2011 to present.

89. DOCUMENTS sufficient to show the negotiations RELATING TO any and all agreements, arrangements and/or transactions between or amongst KINJA, YOU, GMGI and/or GAWKER, from January 1, 2011 to present.

90. DOCUMENTS sufficient to show all assets and/or activities of KINJA that provided any benefit to YOU, GAWKER and/or GMGI at any time from January 1, 2011 to present.

91. DOCUMENTS sufficient to show all assets and/or activities of GAWKER that provided any benefit to YOU, KINJA and/or GMGI at any time from January 1, 2011 to present.

92. DOCUMENTS sufficient to show all assets and/or activities of GMGI that provided any benefit to YOU, KINJA and/or GAWKER at any time from January 1, 2011 to present.

DATED: May 1, 2015

/s/ Kenneth G. Turkel

Kenneth G. Turkel
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Shane B. Vogt
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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 via the e-portal system this 1st day of May, 2015 to the following:

Barry A. Cohen, Esquire
Michael W. Gaines, Esquire
The Cohen Law Group
201 E. Kennedy Blvd., Suite 1950
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