

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.

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**PLAINTIFF'S REQUESTS FOR PRODUCTION OF DOCUMENTS  
CONCERNING NET WORTH  
TO DEFENDANT A. J. DAULERIO**

Pursuant to Florida Rules of Civil Procedure 1.350, Plaintiff Terry Gene Bollea, professionally known as Hulk Hogan ("PLAINTIFF"), hereby requests that Defendant A.J. Daulerio 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 80 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 “DAULERIO” means Defendant A.J. Daulerio 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, telephone conversations or face to face conversations, meetings and conferences.
3. “DENTON” means Defendant Nick Denton 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. “ENTITY” means any 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.

6. “GAWKER” means Defendant Gawker Media, LLC 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. “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.

8. “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.

9. “PERSON” means any individual, 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.

10. “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.

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

12. 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.

13. 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.

14. 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.

15. With respect to your responses to the following requests 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; the general nature or description of the document; and the number of pages it contains.

16. 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 therefor and the identity of the person(s) authorizing or carrying out any such destruction or discard.

17. 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 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, 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 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 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.

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 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.

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 from 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 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 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 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), 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) 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) 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 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 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 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.

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 has 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. 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 DENTON, including without limitation all articles (print media and/or online), internal memos, monthly reports, emails, financial reports and/or financial statements.

56. 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 DENTON, including without limitation all articles (print media and/or online), internal memos, monthly reports, emails, financial reports and/or financial statements.

57. 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 DENTON, including without limitation all articles (print media and/or online), internal memos, monthly reports, emails, financial reports and/or financial statements.

58. DOCUMENTS sufficient to show the location of all bank accounts owned by DENTON from January 1, 2011, to the time of the response to this Request.

59. All DOCUMENTS REFERRING or RELATING TO any real property owned by DENTON (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).

60. All DOCUMENTS REFERRING or RELATING TO any real property leased to DENTON (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.

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

62. 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.

63. 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.

64. 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.



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

66. 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).

67. 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.

68. 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.

69. 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.

70. 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.

71. 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.

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

73. 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).

74. 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.

75. 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.

76. 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.

77. 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.

78. 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.

79. 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.

80. 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*  
\_\_\_\_\_  
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-and-

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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:

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