

Exhibit 2

to

GAWKER'S EXCEPTIONS TO THE SPECIAL DISCOVERY
MAGISTRATE'S REPORT AND RECOMMENDATION TO
GRANT PLAINTIFF'S MOTION TO COMPEL

RECEIVED
3.4.14

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, *et al.*,

Defendants.

**ORDER ON PLAINTIFF'S MOTION TO COMPEL
FURTHER RESPONSES FROM GAWKER MEDIA, LLC**

This cause came before the Court on November 25, 2013 at 9:30 a.m. on Plaintiff's Motion to Compel Further Responses to Discovery Requests (the "Motion") against Defendant Gawker Media, LLC ("Defendant"), and on January 17, 2014 on Defendant's Motion for Reconsideration Regarding Production of "Cease and Desist" Communications or, in the Alternative, for a Stay Pending Appellate Review (the "Motion for Reconsideration"). The Court has reviewed the Court file, reviewed and considered the Motions and response papers, heard argument of counsel, and is otherwise fully advised. Accordingly,

IT IS ORDERED AND ADJUDGED:

Interrogatories

1. As to Interrogatory number 5, the Motion to Compel is withdrawn as moot because the parties have resolved the issue through their meet and confer dialogue.
2. As to Interrogatory number 13, Defendant's objections are sustained in part and overruled in part. Defendant's response may be limited to identifying any individual or entity who, directly or indirectly, received money or other compensation flowing from the publication of the article, the full-length tape itself or excerpts from the full-length tape, which are at issue in this lawsuit, on gawker.com ("publication of the Gawker Story"). Defendant's response may exclude individuals or entities such as employees or vendors, who may have received compensation indirectly as a result of Defendant's use

of revenues generated from the publication of the Gawker Story to pay usual and customary obligations, however, shall not exclude the identification of principals or other personnel whose compensation arose from or related to, in whole or part, revenues generated from the publication of the Gawker Story.

Requests for Production

3. As to Request for Production number 28, Defendant's objections are overruled, but the duration of the request is limited to the production of all responsive documents from October 1, 2009 through the present, and Defendant shall produce all responsive documents within its possession, custody or control within that time period. Defendant's Motion for Reconsideration is denied, and, accordingly, all documents responsive to Plaintiff's Request for Production number 28, namely, all cease and desist letters/takedown requests relating to intellectual property sent to Defendant for the limited duration of October 1, 2009 through the present, shall be produced by Defendant. Defendant's motion for a stay of this ruling pending appeal is denied.
4. As to Request for Production number 30, Defendant's objections are sustained without prejudice to Plaintiff's right to request the subject documents in the future based on a review of the sufficiency of disclosures made in other documents and depositions taken as of November 25, 2013.
5. As to Request for Production numbers 39 and 40, Defendant's objections are sustained without prejudice to Plaintiff's right to request the subject documents in the future based on Plaintiff's ability to obtain the requested information through publicly available resources.
6. As to Request for Production number 49, Defendant's objections are overruled, and Defendant shall produce its entire Editor Wiki.
7. As to Request for Production number 50, Defendant's objections are overruled. Defendant shall produce all responsive documents within its possession, custody or control.
8. As to Request for Production numbers 89 and 90, Defendant's objections are overruled. Defendant shall produce all responsive documents within its possession, custody or control as to Defendants Gawker Media Group, Inc. and Kinja.
9. As to Request for Production number 91, Defendant's objections are sustained without prejudice to Plaintiff's right to request the subject documents in the future based on a review of the sufficiency of disclosures made in other documents and depositions taken as of November 25, 2013.

10. As to Request for Production number 92, Defendant's objections are sustained in part (without prejudice) and overruled in part. Defendant shall determine whether it has any responsive documents not previously produced that reflect amounts of any financial transactions between or among Defendant Gawker Media Group, Inc. and Kinja, KFT. The Court directs the parties to submit this issue to the Discovery Master to determine whether discovery disclosures and deposition testimony to date have provided sufficient information that would otherwise be available in the referenced documents.
11. As to Request for Production number 93, Defendant's objections are overruled, and Defendant shall produce the responsive documents within its possession, custody or control.
12. As to Request for Production numbers 94 through 99, Defendant's objections are sustained without prejudice to Plaintiff's right to request the subject documents in the future.
13. As to Request for Production numbers 101 through 104, Defendant's objections are sustained in part (without prejudice) and overruled in part. Defendant shall produce responsive documents regarding any revenue flowing from the publication of the Gawker Story. The Defendant's objections are otherwise sustained without prejudice to Plaintiff's right to request the subject documents in the future.
14. As to Request for Production number 105, Defendant's objections are sustained without prejudice to Plaintiff's right to request the subject documents in the future.
15. Defendant shall provide responsive documents and interrogatory answers as set forth above within 15 days of the date of this Order.

DONE AND ORDERED in Chambers at Pinellas County, Florida this ____ day of _____, 2014.

Pamela A.M. Campbell
Circuit Court Judge

Original Signed
FEB 26 2014
Pamela A.M. Campbell
Circuit Judge

Copies furnished to:
Counsel of Record

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
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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 GAWKER MEDIA, LLC**

Pursuant to Florida Rules of Civil Procedure 1.350, Plaintiff Terry Gene Bollea, professionally known as Hulk Hogan (“PLAINTIFF”) hereby requests that Defendant Gawker Media, LLC 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, on June 25, 2013, at 10:00 a.m.

Pursuant to the provisions of Florida Rule of Civil Procedure 1.350, you are required to produce the documents requested below, numbered 1 through 88, within thirty days from the certificate of service.

{BC00033273:1}

26. 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.

27. All DOCUMENTS that constitute, REFER or RELATE to all cease and desist COMMUNICATIONS that YOU received from January 1, 2005 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.

28. All DOCUMENTS that constitute, REFER or RELATE to all cease and desist COMMUNICATIONS that YOU received from January 1, 2005 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.

29. All DOCUMENTS that RELATE TO the formation of GAWKER or any affiliated company.

30. All DOCUMENTS that RELATE TO the identity of the owners of GAWKER or any affiliated company.

31. All DOCUMENTS that contain or constitute organization charts for GAWKER and/or its affiliated companies and/or corporate family.

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

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

34. All DOCUMENTS that RELATE TO any and all decisions as to what content to include or not to include in the SEX TAPE.
35. All DOCUMENTS that RELATE TO any decision as to whether to block, obscure, or edit any explicit content in the SEX TAPE.
36. All DOCUMENTS that RELATE TO website traffic, clicks, hits, visitors and/or page views of the WEBPAGE and/or the revenue associated therewith.
37. All DOCUMENTS that RELATE TO website traffic, clicks, hits, visitors and/or page views at GAWKER.COM from January 1, 2010 to the present.
38. All DOCUMENTS that RELATE TO all revenue generated by GAWKER.COM from January 1, 2010 to the present.
39. All DOCUMENTS that RELATE TO website traffic, clicks, hits, visitors and/or page views at each of the GAWKER websites from January 1, 2010 to the present, including the websites Deadspin, Gizmodo, io9, Jalopnik, Jezebel, Kotaku, and Lifehacker.
40. All DOCUMENTS that RELATE TO all revenue generated by each of the GAWKER websites from January 1, 2010 to the present, including the websites Deadspin, Gizmodo, io9, Jalopnik, Jezebel, Kotaku, and Lifehacker.
41. All DOCUMENTS that RELATE TO COMMUNICATIONS with advertisers and/or potential advertisers regarding the WEBPAGE.
42. All DOCUMENTS that RELATE TO COMMUNICATIONS with advertisers and/or potential advertisers regarding PLAINTIFF.
43. All DOCUMENTS that RELATE TO COMMUNICATIONS with advertisers and/or potential advertisers regarding HEATHER CLEM.

87. All DOCUMENTS requested to be identified in PLAINTIFF'S Interrogatory Number 9, propounded concurrently.

88. All DOCUMENTS requested to be identified in PLAINTIFF'S Interrogatory Number 10, propounded concurrently.

DATED: May 21, 2013

/s/ Christina Ramirez

Charles J. Harder, Esq.

PHV No. 102333

HARDER MIRELL & ABRAMS LLP

1801 Avenue of the Stars, Suite 1120

Los Angeles, CA 90067

Tel: (424) 203-1600

Fax: (424) 203-1601

Email: charder@hmafirm.com

-and-

Kenneth G. Turkel, Esq.

Florida Bar No. 867233

Christina K. Ramirez, Esq.

Florida Bar No.

BAJO CUVA COHEN & TURKEL, P.A.

100 North Tampa Street, Suite 1900

Tampa, Florida 33602

Tel: (813) 443-2199

Fax: (813) 443-2193

Email: kturkel@bajocuva.com

Email: cramirez@bajocuva.com

Counsel for Plaintiff

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DAULERIO; KATE BENNERT, and
BLOGWIRE HUNGARY SZELLEMI
ALKOTAST HASZNOSITO KFT aka
GAWKER MEDIA,

Defendants.

_____ /

**SECOND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO DEFENDANT GAWKER MEDIA, LLC**

Pursuant to Florida Rules of Civil Procedure 1.350, Plaintiff Terry Gene Bollea, professionally known as Hulk Hogan ("PLAINTIFF") hereby requests that Defendant Gawker Media, LLC 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, on July 29, 2013, at 10:00 a.m.

Pursuant to the provisions of Florida Rule of Civil Procedure 1.350, you are required to produce the documents requested below, numbered 89 through 106, within thirty days from the certificate of service.

REQUESTS FOR PRODUCTION OF DOCUMENTS

89. All DOCUMENTS that describe the role, function and/or line of business of Gawker Media, LLC, Gawker Media Group, Inc., Gawker Entertainment, LLC, Gawker Technology, LLC, Gawker Sales, LLC, Blogwire Hungary Szellemi Alkotast Hasznosito KFT, and/or their affiliates.

90. All DOCUMENTS that describe the role or function of Gawker Media, LLC, Gawker Media Group, Inc., Gawker Entertainment, LLC, Gawker Technology, LLC, Gawker Sales, LLC, Blogwire Hungary Szellemi Alkotast Hasznosito KFT, and/or their affiliates, with respect to the publication of material on GAWKER.COM.

91. All financial statements, including but not limited to balance sheets, income statements, and statements of changes in financial position, for Gawker Media, LLC, Gawker Media Group, Inc., Gawker Entertainment, LLC, Gawker Technology, LLC, Gawker Sales, LLC, Blogwire Hungary Szellemi Alkotast Hasznosito KFT, and/or their affiliates, including any combined financial statements, covering all periods from January 1, 2010 through the present.

92. All DOCUMENTS that RELATE TO any and all financial transactions between or among Gawker Media, LLC, Gawker Media Group, Inc., Gawker Entertainment, LLC, Gawker Technology, LLC, Gawker Sales, LLC, and/or Blogwire Hungary Szellemi Alkotast Hasznosito KFT, and/or their affiliates, between January 1, 2010 and the present.

93. All DOCUMENTS that RELATE TO the direct or indirect receipt of advertising revenue in connection with GAWKER.COM by Gawker Media, LLC, Gawker Media

Group, Inc., Gawker Entertainment, LLC, Gawker Technology, LLC, Gawker Sales, LLC and/or Blogwire Hungary Szellemi Alkotast Hasznosito KFT, and/or their affiliates.

94. All DOCUMENTS that RELATE TO any and all actions by BLOGWIRE HUNGARY with respect to GAWKER.COM and/or its content.

95. All DOCUMENTS that RELATE TO any and all actions by Gawker Media Group, Inc. with respect to GAWKER.COM and/or its content.

96. All DOCUMENTS that RELATE TO any and all actions by Gawker Entertainment, LLC with respect to GAWKER.COM and/or its content.

97. All DOCUMENTS that RELATE TO any and all actions by Gawker Technology, LLC with respect to GAWKER.COM and/or its content.

98. All DOCUMENTS that RELATE TO any and all actions by Gawker Sales, LLC with respect to GAWKER.COM and/or its content.

99. DOCUMENTS sufficient to show all revenues received by Gawker Media, LLC since January 1, 2012, and/or the basis for its receipt of such revenues.

100. DOCUMENTS sufficient to show all revenues, compensation, funding and/or assets received by Gawker Media Group, Inc. since January 1, 2012, and/or the basis for its receipt of such revenues, compensation, funding and/or assets.

101. DOCUMENTS sufficient to show all revenues, compensation, funding and/or assets received by Gawker Entertainment, LLC since January 1, 2012, and the basis for its receipt of such revenues, compensation, funding and/or assets.

102. DOCUMENTS sufficient to show all revenues, compensation, funding and/or assets received by Gawker Technology, LLC since January 1, 2012, and the basis for its receipt of such revenues, compensation, funding and/or assets.

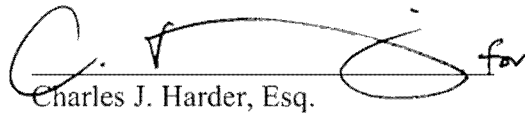
103. DOCUMENTS sufficient to show all revenues, compensation, funding and/or assets received by Gawker Sales, LLC since January 1, 2012, and the basis for its receipt of such revenues, compensation, funding and/or assets.

104. DOCUMENTS sufficient to show all revenues, compensation, funding and/or assets received by BLOGWIRE HUNGARY since January 1, 2012, and the basis for its receipt of such revenues, compensation, funding and/or assets.

105. All DOCUMENTS that RELATE TO COMMUNICATIONS between GAWKER, on the one hand, and any vendor engaged to conduct, assist in, or otherwise participate in any electronic discovery, computer searches, or database management with respect to DOCUMENTS that are relevant to this action.

106. All DOCUMENTS that RELATE TO any protocols, instructions, or search criteria RELATING TO any electronic discovery, computer searches, or database management conducted or assisted by any vendor with respect to DOCUMENTS that are relevant to this action.

DATED: June 27, 2013

A handwritten signature in black ink, appearing to read "C. J. Harder" with a stylized flourish at the end.

Charles J. Harder, Esq.
PHV No. 102333
HARDER MIRELL & ABRAMS LLP
1801 Avenue of the Stars, Suite 1120
Los Angeles, CA 90067
Tel: (424) 203-1600
Fax: (424) 203-1601
Email: charder@hmafirm.com

-and-

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Florida Bar No. 867233
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100 North Tampa Street, Suite 1900
Tampa, Florida 33602
Tel: (813) 443-2199
Fax: (813) 443-2193
Email: kturkel@bajocuva.com
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BLOGWIRE HUNGARY SZELLEMI
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GAWKER MEDIA,

Defendants.

**PLAINTIFF'S SECOND SET OF INTERROGATORIES
TO DEFENDANT GAWKER MEDIA, LLC**

Plaintiff Terry Gene Bollea, professionally known as Hulk Hogan, by counsel and pursuant to Florida Rule of Civil Procedure 1.340, requests that Defendant Gawker Media LLC answer the interrogatories set forth below, numbered 11 through 14, within 30 days from the certificate of service.

DEFINITIONS AND INSTRUCTIONS

As used in these interrogatories:

(a) "YOU" or "YOUR" or "GAWKER" means Defendant Gawker Media LLC and its parent company, subsidiaries, affiliated companies, including but not limited to Gawker Media Group, Inc., Gawker Entertainment, LLC, Gawker Technology, LLC, Gawker Sales, LLC, and/or Blogwire Hungary Szellemi Alkotast Hasznosito KFT, and all of their members,

(p) In the event any interrogatory 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.

(q) A separate answer shall be furnished for each interrogatory.

INTERROGATORIES

(If answering for another PERSON or ENTITY, answer with respect to that PERSON or ENTITY, unless otherwise stated.)

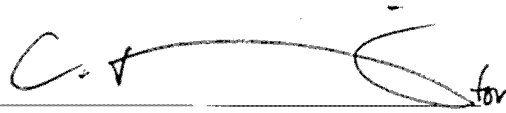
11. STATE ALL FACTS regarding BLOGWIRE HUNGARY's role in the creation, editing, and/or posting of content on GAWKER.COM.

12. Describe the role and line of business of GAWKER and each company affiliated in any way with GAWKER throughout the period between January 1, 2010 and the present.

13. IDENTIFY each entity and/or individual which directly or indirectly receives money or other compensation that is generated by or originated by GAWKER.COM or any content thereon.

14. IDENTIFY any vendor engaged to conduct, assist in, or otherwise participate in any electronic discovery, computer searches, or database management with respect to DOCUMENTS that are relevant to this action.

DATED: June 27, 2013

A handwritten signature in black ink, appearing to read 'C. J. Harder', with a horizontal line drawn underneath it.

Charles J. Harder, Esq.
PHV No. 102333
HARDER MIRELL & ABRAMS LLP
1801 Avenue of the Stars, Suite 1120
Los Angeles, CA 90067
Tel: (424) 203-1600
Fax: (424) 203-1601
Email: charder@hmafirm.com

Kenneth G. Turkel, Esq.
Florida Bar No. 867233
Christina K. Ramirez, Esq.
Florida Bar No.
BAJO CUVA COHEN & TURKEL, P.A.
100 North Tampa Street, Suite 1900
Tampa, Florida 33602
Tel: (813) 443-2199
Fax: (813) 443-2193
Email: kturkel@bajocuva.com
Email: cramirez@bajocuva.com

Counsel for Plaintiff