

Exhibit 2¹

Documents Produced by **Plaintiff Terry Gene Bollea:**

- Preservations of articles/pages on the Gawker/Kinja websites:
 - o BOLLEA000001-000032
 - o BOLLEA000038-000450
 - o BOLLEA000676-000681
 - o BOLLEA000692
 - o BOLLEA000704-000705
 - o BOLLEA002683-002713
 - o BOLLEA002722-003955
 - o BOLLEA004159-004241
 - o BOLLEA004257-004267
 - o BOLLEA004280-004282
 - o BOLLEA004299-004311
 - o BOLLEA004411-004414
 - o BOLLEA004462-004469
 - o BOLLEA004537-004555
 - o BOLLEA004565-004567
 - o BOLLEA004622-004623
 - o BOLLEA004798-004827
- Third party websites/articles referring or relating to Gawker, Daulerio, Denton and/or associated persons:
 - o BOLLEA000033-000037
 - o BOLLEA000682-000688
 - o BOLLEA000693-000703
 - o BOLLEA000706-000730
 - o BOLLEA003956-004133
 - o BOLLEA004242-004245
 - o BOLLEA004253-004256
 - o BOLLEA004268-004279
 - o BOLLEA004283-004298
 - o BOLLEA004312-004325
 - o BOLLEA004327-004410
 - o BOLLEA004415-004446
 - o BOLLEA004448-004461
 - o BOLLEA004470-004503
 - o BOLLEA004505-004536

¹ For purposes of clarity, Plaintiff's Request for Admission does not request that Gawker admit the introductory descriptions of categories of documents provided herein are accurate or authentic descriptions of those documents.

- BOLLEA004556-004564
- BOLLEA004568-004621
- BOLLEA004672-004731
- BOLLEA004828-004837
- Preservations of third party websites exhibiting the sex video:
 - BOLLEA000454-000515
 - BOLLEA000604-000605
 - BOLLEA000608-000609
 - BOLLEA000643-000644
 - BOLLEA004624-004656
- Preservations of online articles referring or relating to Plaintiff:
 - BOLLEA 000689-000691
 - BOLLEA 004134-004157
- Demand letters to, and preservations of, third party websites exhibiting images of the sex video:
 - BOLLEA000780-001056
- Media (photo, audio or video) files:
 - BOLLEA000731
 - BOLLEA001058
 - BOLLEA004326.
 - BOLLEA004447
 - BOLLEA004504
 - BOLLEA004657-004658
- Google Trends data:
 - BOLLEA002673-002674
- USPTO Documents:
 - BOLLEA002675-002682
- Correspondence between third parties and Gawker, Daulerio, Denton and/or associated persons referring or relating to Gawker Media LLC articles/posts:
 - BOLLEA002714-002721
- Documents relating to the finances of Gawker and/or Kinja:
 - BOLLEA004732-004775
- Other documents not categorized above:
 - BOLLEA004246-004252 (Article about journalism, ethics and invasion of privacy)
 - BOLLEA004659-004665 (Articles regarding previous celebrity sex videos)
 - BOLLEA004666-004671 (Preservations of the Vivid website)
 - BOLLEA004776-004797 (WhoIs documents)

Documents produced by Defendant **Gawker Media LLC**:

- Email alerts from non-Gawker Media entities that mention Plaintiff and/or his family, including without limitation Google Alerts:
 - o GAWKER 00001-00113
 - o GAWKER 00140-00141
 - o GAWKER 00146
 - o GAWKER 00148-00152
 - o GAWKER 00155-00156
 - o GAWKER 00159-00162
 - o GAWKER 00165
 - o GAWKER 00167
 - o GAWKER 00174-00179
 - o GAWKER 00186-00187
 - o GAWKER 00198-00199
 - o GAWKER 00201-00206
 - o GAWKER 00232
 - o GAWKER 00246-00249
 - o GAWKER 00279-00280
 - o GAWKER 00283-00294
 - o GAWKER 00297-00302
 - o GAWKER 00306-00320
 - o GAWKER 00329-00338
 - o GAWKER 00341-00416
 - o GAWKER 00419-00466
 - o GAWKER 00471-00494
 - o GAWKER 00496
 - o GAWKER 00505-00507
 - o GAWKER 00509-00514
 - o GAWKER 00524-00527
 - o GAWKER 00529-00532
 - o GAWKER 00536-00548
 - o GAWKER 00554
 - o GAWKER 00566-00606
 - o GAWKER 00613
 - o GAWKER 00630-00634
 - o GAWKER 00637-00645
 - o GAWKER 00648-00650
 - o GAWKER 00653
 - o GAWKER 00660-00661
 - o GAWKER 00669-00713
 - o GAWKER 00716-00759
 - o GAWKER 00783-00805
 - o GAWKER 00810-00814
 - o GAWKER 00847-00858
 - o GAWKER 00860-00864
 - o GAWKER 00866-00870

- GAWKER 00885-00891
- GAWKER 00895-00896
- GAWKER 00897-00906
- GAWKER 00912-00914
- GAWKER 00923-00930
- GAWKER 00934-00944
- GAWKER 00959
- GAWKER 00961
- GAWKER 00963-00985
- GAWKER 00988-00999
- GAWKER 01034-01053
- Emails sent or received by Gawker Media LLC employees, which refer or relate to Plaintiff and/or any Gawker article about Plaintiff:
 - GAWKER 00114-00127
 - GAWKER 00130-00139
 - GAWKER 00147
 - GAWKER 00153-00154
 - GAWKER 00163-00164
 - GAWKER 00166
 - GAWKER 00168-00173
 - GAWKER 00180-00185
 - GAWKER 00188-00197
 - GAWKER 00200
 - GAWKER 00207-00231
 - GAWKER 00234-00235
 - GAWKER 00239
 - GAWKER 00242-00245
 - GAWKER 00250
 - GAWKER 00281
 - GAWKER 00295-00296
 - GAWKER 00303-00305
 - GAWKER 00321-00328
 - GAWKER 00339-00340
 - GAWKER 00417-00418
 - GAWKER 00470
 - GAWKER 00495
 - GAWKER 00497
 - GAWKER 00515-00520
 - GAWKER 00549-00553
 - GAWKER 00558-00565
 - GAWKER 00609-00612
 - GAWKER 00616-00627
 - GAWKER 00646-00647
 - GAWKER 00651-00652
 - GAWKER 00654-00659
 - GAWKER 00662-00668

- GAWKER 00714-00715
- GAWKER 00806-00809
- GAWKER 00815-00846
- GAWKER 00865
- GAWKER 00892-00894
- GAWKER 00908-00911
- GAWKER 00915-00922
- GAWKER 00931-00933
- GAWKER 00945
- GAWKER 00949-00954
- GAWKER 00958
- GAWKER 01055-001069
- GAWKER 01070-001071
- Email alerts and/or mail-outs sent by Gawker Media LLC and linking recipients to articles referring or relating to Plaintiff:
 - GAWKER 00128-00129
 - GAWKER 00251-00278
 - GAWKER 00498-00504
 - GAWKER 00533-00534
 - GAWKER 00607-00608
 - GAWKER 00614-00615
 - GAWKER 00628-00629
 - GAWKER 00635-00636
 - GAWKER 00871-00884
 - GAWKER 00912-00914
 - GAWKER 01003-01030
- Correspondence between Gawker Media LLC and David Houston, counsel for Plaintiff:
 - GAWKER 00142-00144
 - GAWKER 00157-00158
 - GAWKER 00646-00647
 - GAWKER 01186-01188
- Analytics prepared internally by Gawker Media LLC:
 - GAWKER 00240-00241
 - GAWKER 01158-01184
- Internal Gawker Media LLC email alerts referring to articles referring or relating to Plaintiff:
 - GAWKER 00946-00948
 - GAWKER 00955-00957
 - GAWKER 00960
 - GAWKER 00962
 - GAWKER 00986-00987
 - GAWKER 01000-01002
 - GAWKER 01031-01033
 - GAWKER 01054
- Gawker Media LLC's internal management documents, including without limitation human resources documents and company filings:

- GAWKER 01072-01135
- GAWKER 23389-23409
- GAWKER 24401-24426
- Documents relating to Gawker Media LLC's corporate formation:
 - GAWKER 01136-01146
- Documents relating to Gawker Media LLC's finances:
 - GAWKER 01147
 - GAWKER 01430-01434
 - GAWKER 01439
 - GAWKER 18319-18323
 - GAWKER 23412-23415
 - GAWKER 24324-24331
 - GAWKER 24348-24398
- Analytics for various Gawker Media LLC properties prepared by companies other than Gawker Media LLC:
 - GAWKER 01148-01157
 - GAWKER 01185
 - GAWKER 18331-18333
 - GAWKER 23283-23286
 - GAWKER 23410-23411
- Preservations of articles and webpages posted on Gawker Media LLC websites:
 - GAWKER 01255-01398
 - GAWKER 18324-18330
 - GAWKER 23133-23282
 - GAWKER 23387-23388
- Preservations of articles from non-Gawker Media LLC websites and magazines referring or relating to Plaintiff, his personal life, the sex video and Plaintiff's removal of the sex video from various internet websites:
 - GAWKER 01399-01424
 - GAWKER 23421-24318
- Various video files of the sex video:
 - GAWKER 01428-01429
- Gawker Media LLC's Editorial Guides:
 - GAWKER 01437-01438
 - GAWKER 01573-01607
- Preservations of conversations held on Gawker Media's internal instant messaging system:
 - GAWKER 01536-01572
- Advertising orders received by Gawker Media LLC:
 - GAWKER 01608-16708
- "Cease and Desist" communications received by Gawker Media LLC:
 - GAWKER 16709-18318
 - GAWKER 18334-23132
- Books:
 - GAWKER 24195-24196
- Media files, including audio and video files:

- GAWKER 23416-23420
- GAWKER 24319-24323
- Documents relating to Kinja KFT:
 - GAWKER 24332-24347
 - GAWKER 24399-24400
- Other internal Gawker Media LLC emails and documents not elsewhere categorized:
 - GAWKER 00467-00469 (Kate Bennert's self-completed annual review)
 - GAWKER 00508 (Emails between K. Bennert and acquaintance)
 - GAWKER 01425-01427 (Email from AJ Daulerio to staff regarding leaving Gawker and Nick Denton's comments on same)
 - GAWKER 01435-01436 List of terms used by Gawker for e-discovery searches)

Documents produced by **AJ Daulerio**

- All documents: AJD 001-038

Documents produced by **Nick Denton**

- All documents: Denton 001-006