

**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. 12012447 CI-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 TERRY GENE BOLLEA'S EXHIBIT LIST

Plaintiff, Terry Gene Bollea, professionally known as Hulk Hogan, by counsel and pursuant to paragraph five of the Court's Order Setting Pre-Trial Conference and Jury Trial, dated February 18, 2015, submits the following list of exhibits for trial:

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
1.	Email correspondence between A.J. Daulerio and Tony Burton September/October 2012 AJD 001_C-006_C Redacted per the Court's April 22, 2015 Order			
2.	Gawker.com – Even for a Minute, Watching Hulk Hogan Have Sex in a Canopy Bed is Not Safe For Work but Watch it Anyway October 4, 2012 BOLLEA 000038-000041			

¹ The descriptions provided for each exhibit herein are intended to be descriptive in nature only and are not binding on Plaintiff.

² Objection Codes

- A-Authenticity
- R-Relevancy
- H-Hearsay
- UP-Unduly prejudicial
- O-All Objections
- N-No Objections
- Any other objection-detail specific objection

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
3.	<p>Gawker.com articles:</p> <ol style="list-style-type: none"> 1. Many People Asked This Hulk Hogan Cosplayer About His Sex Tape This Weekend (October 15, 2012) 2. Some Additional Notes About the Hulk Hogan Sex Tape We Should All Take Into Consideration As Things Fall Apart (October 5, 2012) <p>BOLLEA 000445-000447</p>			
4.	<p>Deadspin.com – The Iron Sheik: Hulk Hogan Sex Tape Proves “He Have Grasshopper Dick”</p> <p>October 7, 2012</p> <p>BOLLEA 000448-000450</p>			
5.	<p>Non-party websites exhibiting the Gawker produced sex video.</p> <p>BOLLEA 000459, 000461-000462, 000464-000467, 000470, 000472-000473, 000478-000484, 000488-000494, 000500-000501, 000604-000605</p>			
6.	<p>Deadspin.com – Brett Favre’s Cellphone Seduction of Jenn Sterger (Update)</p> <p>October 7, 2010</p> <p>Subsequently produced as BOLLEA 000676-000677</p>			

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7.	<p>Gawker.com – These Topless Photos of Kate Middleton Put Us as Two for Three on Royal Nudie Pic Scandals [NSFW] (Update)</p> <p>September 14, 2012</p> <p>Subsequently produced as BOLLEA 000678-000681</p>			
8.	<p>GQ.com – The Worldwide Leader in Dong Shots</p> <p>February 2011</p> <p>Subsequently produced as BOLLEA 000682-000686</p>			
9.	<p>NYMag.com – Nick Denton Using His Own Love Life to Plug Hulk Hogan Sex Tape</p> <p>October 8, 2012</p> <p>Subsequently produced as BOLLEA 000687-000688</p>			
10.	<p>TheGuardian.com – Gawk, don't talk</p> <p>December 1, 2006</p> <p>Subsequently produced as BOLLEA 000699-000703</p>			
11.	<p>Gawker.com – Fred Durst: Touch My Balls And Ass And Then Sue Gawker</p> <p>Subsequently produced as BOLLEA 000704-000705</p>			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
12.	<p>Wired.com – Nick Denton Is in Your Head</p> <p>April 16, 2013</p> <p>Subsequently produced as BOLLEA 000709</p>			
13.	<p>CBS News – Rebecca Gayheart, “McSteamy” Eric Dane, Get Gawker Settlement Over Threesome Video</p> <p>August 4, 2010</p> <p>Subsequently produced as BOLLEA 000710-000711</p>			
14.	<p>NewYorker.com – Search and Destroy</p> <p>October 18, 2010</p> <p>Subsequently produced as BOLLEA 000712-000730</p>			
15.	<p>Letter from Steven Hirsch to Hulk Hogan, c/o David Houston</p> <p>BOLLEA 000779</p>			
16.	<p>Letter from Martin Ellison, Sex.com, to David Houston</p> <p>BOLLEA 001057</p>			
17.	<p>Email from Jules Wortman to Terry Bollea</p> <p>October 3, 2012</p> <p>BOLLEA 001060-67</p>			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
18.	Google Trends chart to “gawker” January 2012 to December 2013 BOLLEA 002673			
19.	United States Patent and Trademark Office documents relating to Gawker Media LLC properties. BOLLEA 002675-02682 GAWKER 24412-24426			
20.	Email correspondence between A.J. Daulerio and the subject of a Deadspin article May 2010 BOLLEA 002714-002721			
21.	Gawker.com – Beyoncé, Clooney, Affleck: What’s the Best Rumor You Heard This Week? October 24, 2014 BOLLEA 002729-002741			
22.	Gawker.com – I’m Not Straight, But My Boyfriend Is February 14, 2013 BOLLEA 002918-002941			

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23.	<p>Gawker.com articles</p> <ol style="list-style-type: none"> 1. ISIS Beheads American Journalist James Foley in Video Message to U.S. (August 19, 2014) 2. Algerian Fighters Linked to ISIS Behead French Hostage in Video (September 24, 2014) 3. ISIS Beheads Japanese Hostage Kinji Goto in New Video (January 31, 2015) 4. ISIS Claims to Have Beheaded Third American Hostage in New Video (November 16, 2014) 5. ISIS Reportedly Burns Captured Jordanian Pilot Alive (February 3, 2015) <p>BOLLEA 002942-002981, 004798-004824</p>			
24.	<p>Gawker.com articles:</p> <ol style="list-style-type: none"> 1. Some Horrible Sociopath Hung a Used Condom From a F Train Handrail (October 10, 2014) 2. Three Weeks Later, the F Train Condom Is Still Fucking Hanging There (October 14, 2014) <p>BOLLEA 003256-003277, 000364-003577</p>			
25.	<p>Gawker.com – The 13 Most Powerful Images of Naked Celebrities of 2012</p> <p>December 5, 2012</p> <p>BOLLEA 003406-003419</p>			

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26.	<p>Gawker.com – What happened to the stock option program?</p> <p>August 26, 2014</p> <p>BOLLEA 003627-003636</p>			
27.	<p>Archive.org – Bathroom Sex Pandemic Reaches The Damp Floor of Indiana Sports Bar (UPDATE)</p> <p>BOLLEA 003725</p>			
28.	<p>Deadspin.com – Cocaine, Suicide, Women, and Guns: An A.J. Daulerio Story</p> <p>January 4, 2012</p> <p>BOLLEA 003737-003746</p>			
29.	<p>Gizmodo.com – This is Apple’s Next iPhone</p> <p>April 19, 2010</p> <p>BOLLEA 003898-003925</p>			
30.	<p>PlayboySFW.Kinja.com – The Playboy Interview: A Candid Conversation with Gawker’s Nick Denton</p> <p>February 21, 2014</p> <p>BOLLEA 004089-004107</p>			
31.	<p>The Daily Beast – The Gospel According to Nick Denton—What Next For The Gawker Founder?</p> <p>December 14, 2014</p> <p>BOLLEA 004113-004120</p>			

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32.	<p>CapitalNewYork.com – No phones, Twitter, Instagram allowed at Nick Denton’s wedding</p> <p>May 13, 2014</p> <p>BOLLEA 004131-004133</p>			
33.	<p>Gawker.com/Matt Hardigree – How Gawker Media Blew Up The Traditional News Business</p> <p>March 18, 2013</p> <p>BOLLEA 004206-004212</p>			
34.	<p>Gawker.com – The Writer Nick Denton Couldn’t Let Go (And Then Secretly Smeared)</p> <p>April 30, 2009</p> <p>BOLLEA 004230-004241</p>			
35.	<p>Observer.com – Gossip Guys: Nick Denton and Michael Wolff Teach Teenage Girls to Survive</p> <p>October 6, 2014</p> <p>BOLLEA 004242-004245</p>			
36.	<p>Watchdog.org – The Gawkerization of the media</p> <p>December 13, 2013</p> <p>BOLLEA 004253-004256</p>			

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37.	<p>WashingtonPost.com – Gawker Widens Its Withering Gaze</p> <p>June 22, 2009</p> <p>BOLLEA 004269-004271</p>			
38.	<p>Gizmodo.com – At Last, This Revenge Porn Kingpin Has Been Stopped</p> <p>January 29, 2015</p> <p>BOLLEA 004280-004282</p>			
39.	<p>DailyFinance.com – How Checkbook Journalism Gave Gizmodo Its iPhone Scoop</p> <p>April 19, 2010</p> <p>BOLLEA 004296-004298</p>			
40.	<p>Gawker Media Management</p> <p>BOLLEA 004411-004414</p>			
41.	<p>International Business Times – Gawker Media Hopes To Spur E-Commerce Revenue with “Commerce Journalism,” Says Nick Denton</p> <p>January 24, 2013</p> <p>BOLLEA 004415-004416</p>			
42.	<p>BusinessInsider.com – Gawker Media Generated \$45 Million In Net Revenue Last Year And It’s Raising A \$15 Million Round of Debt</p> <p>January 28, 2015</p> <p>BOLLEA 004419-004425</p>			

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43.	<p>NPR.org – Gawker Wants To Offer More Than Snark, Gossip</p> <p>January 3, 2011</p> <p>BOLLEA 004433-004436</p>			
44.	<p>CNET.com – How Gizmodo escaped indictment in iPhone prototype deal</p> <p>October 12, 2011</p> <p>BOLLEA 004454-004461</p>			
45.	<p>TheAwl.com – Inside Gawker Media’s First Company-Wife Meeting</p> <p>September 8, 2011</p> <p>BOLLEA 004470-004477</p>			
46.	<p>YouTube.com – John Cook (Former Editor-in-Chief at Gawker) on “Ethics in Journalism #GamerGate</p> <p>Uploaded: November 8, 2014 Originally aired: April 4, 2014</p> <p>BOLLEA 004502-004503</p>			
47.	<p>Video found at YouTube.com – John Cook (Former Editor-in-Chief at Gawker) on “Ethics in Journalism #GamerGate</p> <p>BOLLEA 004504</p>			

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48.	DailyFinance.com – Muzzled Reporter Says ‘Maw of Yahoo’ No Place for Journalism September 22, 2010 BOLLEA 004525-004527			
49.	Email from David Houston to nick@gawker.com October 5, 2012 BOLLEA 00453			
50.	Gawker.com - That Type of Girl Deserves It September 27, 2014 BOLLEA 004565-004567			
51.	TheNextWeb.com – The internal memo sent to Gawker staff after the attack December 18, 2010 BOLLEA 004573-004577			
52.	Multiple Gawker Media memorandums published at JimRomenesko.com Various dates BOLLEA 004672-004731, 005364-005373			
53.	Non-party websites exhibiting the Gawker produced sex video. BOLLEA 004624-004645			

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54.	BusinessInsider.com – Someone Is Willing To Pay A WHOLE Lot Of Money To Get Kim Kardashian’s Sex Tape Off The Market August 31, 2011 BOLLEA 004659-004660			
55.	AVN.com – Alleged Gene Simmons Sex Video Released February 19, 2008 BOLLEA 004661-004662			
56.	Preservations of Vivid.com and ShopVivid.com BOLLEA 004666-004671			
57.	Multiple Whois Records for Gawker.com Various dates BOLLEA 004776-004783			
58.	Whois Records for Gawker Media websites September 12, 2014 BOLLEA 004784-004797			
59.	BusinessInsider.com – Why Gawker Media is Kicking Everyone’s Ass April 8, 2010 BOLLEA 004828-004832			

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60.	Philly.com – Deadspin’s A.J. Daulerio playing a different game February 14, 2011 BOLLEA 004833-004835			
61.	Post on Nick Denton’s Twitter account October 1, 2013 BOLLEA 004836-004837			
62.	Preservations of VividCeleb.com BOLLEA 005142-005159			
63.	Multiple posts on the Facebook page for Gawker Various dates BOLLEA 005160-005168			
64.	Deadspin.com – Erin Andrews And Guilt, Imagined And Otherwise July 21, 2009 BOLLEA 005169-005174			
65.	Deadspin.com – ESPN Doles Out Swift Bristol Justice Over New York Post’s Erin Andrews Coverage July 22, 2009 BOLLEA 005175-005182			

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66.	Gawker.com – All Your McSteamy Dreams Come True August 18, 2009 BOLLEA 005183-005184			
67.	Gawker.com – Internet’s Sleaziest Pornographer Calls It Quits: ‘I’m Done with Looking at Little Kids Naked All Day’ April 19, 2012 BOLLEA 005185-005189			
68.	Gawker.com – Unmasking Reddit’s Violentacrez, The Biggest Troll on the Web October 12, 2012 BOLLEA 005190-005204			
69.	Gawker.com – The Case of Making Revenge Porn a Federal Crime March 27, 2014 BOLLEA 005205-005210			
70.	Jezebel.com – Tumblr Refuses to Take Down Illegal Public Restroom Photos July 16, 2014 BOLLEA 005211-005215			

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71.	<p>Gawker.com – One Woman’s Crusade Against Revenge Porn</p> <p>May 1, 2013</p> <p>BOLLEA 005216-005223</p>			
72.	<p>Gawker.com – A Judge Told Us to Take Down Our Hulk Hogan Sex Tape Post. We Won’t.</p> <p>April 25, 2013</p> <p>BOLLEA 005224-005231</p>			
73.	<p>Gawker.com – Ladies: 8,000 Creeps on Reddit Are Sharing the Nude Photos You Posted to Photobucket</p> <p>August 8, 2012</p> <p>BOLLEA 005244-005257</p>			
74.	<p>Gawker.com – Pervy Flesh-Peddler Bill O’Reilly Plays Erin Andrews Peephole Video On-Air</p> <p>July 23, 2009</p> <p>BOLLEA 005258-005263</p>			
75.	<p>Complaint for Copyright Infringement and Demand for Jury Trial in <i>Dane, Gayheart v. Gawker Media, LLC et al.</i></p> <p>September 23, 2009</p> <p>BOLLEA 005334-005340</p>			

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76.	<p>TheGate – The New News: Ethics’ Place in the Digital World</p> <p>February 16, 2015</p> <p>BOLLEA 005344-005347</p>			
77.	<p>Post on Nick Denton’s Twitter account</p> <p>September 23, 2009</p> <p>BOLLEA 005348</p>			
78.	<p>NYDailyNews – Rebecca Gayheart and husband Eric Dane win settlement over sex tape posted on Gawker</p> <p>August 4, 2010</p> <p>BOLLEA 005349-005350</p>			
79.	<p>Society of Professional Journalists Code of Ethics</p> <p>BOLLEA 005558</p>			
80.	<p>Business Insider – AOL Hopes To Turn A Profits On Huffington Post Next Year</p> <p>December 23, 2013</p> <p>Subsequently produced as BOLLEA 005589-005592</p>			
81.	<p>TheAwl.com – Gawker Media Moves To Uniques: Be “Even More of a Hustler” Says Nick Denton</p> <p>January 5, 2010</p> <p>Subsequently produced as BOLLEA 005610-005638</p>			

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82.	S&P Capital IQ – Grandparents.com Subsequently produced as BOLLEA 005671			
83.	Google Trends for “gawker” January 2012 to January 2015 Subsequently produced as BOLLEA 006027-006029			
84.	Quantcast.com – Bleacher Report Network Subsequently produced as BOLLEA 006096-006100			
85.	Quantcast.com – BuzzFeed Network Subsequently produced as BOLLEA 006101-006105			
86.	S&P Capital IQ – Grandparents.com Subsequently produced as BOLLEA 006111			
87.	Quantcast.com – Ozy.com Subsequently produced as BOLLEA 006112-006116			
88.	PWC – IP valuation, exploitation and finance June 2011 Subsequently produced as BOLLEA 006122-006165			

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89.	CogentValuation.com – The Pricing of Online Media Subsequently produced as BOLLEA 006172-006178			
90.	SeekingAlpha.com – Valuation Metrics Of Large vs. Small Website Acquisitions August 27, 2008 Subsequently produced as BOLLEA 006179-006180			
91.	TheVerge.com – YouTube view counts stop at 301 to prevent ‘counterfeit’ views June 26, 2012 BOLLEA 006381-006382			
92.	ROI Factor Blog – How Does YouTube Count Views? August 2010 BOLLEA 006383-006392			
93.	9to5Google – Google announces changes to YouTube view count validation February 4, 2014 BOLLEA 006393-006395			

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94.	<p>StackOverflow.com – Tracking YouTube player embedded video view count</p> <p>October 15, 2013</p> <p>BOLLEA 006396</p>			
95.	<p>StackOverflow.com – How can I track a click event of an embedded video (youtube, vimeo, etc.)? (to track play count)</p> <p>August 31, 2011</p> <p>BOLLEA 006397-006399</p>			
96.	<p>GQ magazine</p> <p>February, 2011</p> <p>BOLLEA 006401</p> <p>Plaintiff previously provided a copy of this exhibit to Defendants and will not be providing any additional copies with this list.</p>			
97.	<p>New Yorker magazine</p> <p>October, 2010</p> <p>BOLLEA 006402</p> <p>Plaintiff previously provided a copy of this exhibit to Defendants and will not be providing any additional copies with this list.</p>			

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98.	Playboy magazine March, 2014 BOLLEA 006403 Plaintiff previously provided a copy of this exhibit to Defendants and will not be providing any additional copies with this list.			
99.	Wired magazine May, 2013 BOLLEA 006404 Plaintiff previously provided a copy of this exhibit to Defendants and will not be providing any additional copies with this list.			
100.	SearchEngineWatch.com – New York Times to Sell About.com: Google to Blame? August 16, 2012 BOLLEA 006443-006445			
101.	Form 10-K – XO Group Inc. BOLLEA 006446-006537			
102.	Form 10-K – Everyday Health, Inc. BOLLEA 006538-006677			
103.	Form 10-K – TheStreet, Inc. BOLLEA 006678-006834			

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104.	S&P Capital IQ – Bleacher Report, Inc. BOLLEA 006835-006836			
105.	S&P Capital IQ – BuzzFeed, Inc. BOLLEA 006837-006838			
106.	S&P Capital IQ – Grandparents.com, Inc. BOLLEA 006839-006840			
107.	S&P Capital IQ – Yelp Inc. BOLLEA 006841-006843			
108.	ComScore.com – comScore Ranks the Top 50 U.S. Digital Media Properties for September 2014 October 22, 2014 BOLLEA 006844-006849			
109.	Presentation prepared by The Street BOLLEA 006850-006867			
110.	Email from Charles Harder to Stephen Diaco and Todd Alan Clem aka Bubba The Love Sponge Clem October 16, 2012 BOLLEA 000732-35			
111.	Email from Tony Burton to A.J. Daulerio September 27, 2012 DBA 0058			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
112.	Emails between Tony Burton and A.J. Daulerio September 27, 2012 DBA 0348-0349			
113.	Emails between Tony Burton and A.J. Daulerio September 27, 2012 DBA 0350-0352			
114.	Emails sent to tips@gawker.com Various dates GAWKER 00061-00069			
115.	HollywoodReporter.com – Gawker’s Nick Denton Explains Why Invasion of Privacy Is Positive for Society May 22, 2013 Subsequently produced as BOLLEA 000706-000708			
116.	Internal Gawker email correspondence October 4, 2012 GAWKER 00114-0015			
117.	Internal Gawker email correspondence October 4, 2012 GAWKER 00125			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
118.	Email sent to tips@gawker.com October 5, 2012 GAWKER 00140			
119.	Letter from David Houston to Gawker Media and Nick Denton and response to same October 5, 2012; October 9, 2012 GAWKER 00142-00144, 157			
120.	Email sent to tips@gawker.com October 6, 2012 GAWKER 00146			
121.	Email from Valerio Stavolo to A.J. Daulerio October 11, 2012 GAWKER 00163			
122.	Internal Gawker email correspondence October 2012 GAWKER 00168-69			
123.	Email correspondence between A.J. Daulerio and James King October 16, 2012 GAWKER 00188			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
124.	Email correspondence between A.J. Daulerio and James King October 16, 2012 GAWKER 00189			
125.	Email correspondence between A.J. Daulerio and unknown person October 2012 GAWKER 00197			
126.	Email correspondence between A.J. Daulerio, Emma Carmichael and Kate Bennert October 2012 GAWKER 00216			
127.	Email from Nick Denton to edit@gawker.com October 10, 2012 GAWKER 00224-25			
128.	Email from AJ Daulerio to Jim Cooke November 2, 2012 GAWKER 00228			
129.	Email from Lauren Bertolini to Emma Carmichael December 18, 2012 GAWKER 00240-41			

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130.	Email from Gawker to tips@gawker.com January 1, 2013 GAWKER 00265-00278			
131.	Email from Jim Cooke to John Cook April 25, 2013 GAWKER 00303-00305			
132.	Emails between Emma Carmichael, A.J. Daulerio and Kate Bennert October 2012 GAWKER 00517-00518			
133.	Email from Diane Schwartz to “Traffic Gawker” and Stefanie Joho October 4, 2012 GAWKER 00549-52			
134.	Email from Scott Kidder to Maureen Heaton April 25, 2013 GAWKER 00910-00911			
135.	Emails between Diane Schwartz and Allison Wentz October 4, 2012 GAWKER 00950_C-00954_C, 00958			

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136.	Email from "Post Alerts" to ops@gawker.com October 9, 2012 GAWKER 00960			
137.	Offer of employment to A.J. Daulerio June 26, 2008 GAWKER 01119_C-01124_C			
138.	Emails from AJ Daulerio and Nick Denton to Gawker staff January 10, 2013 GAWKER 01426-27			
139.	Video file titled "Gawker_4702.mp4" GAWKER 01429			
140.	Gawker Editorial Resources – Style Guide GAWKER 01438			
141.	Gawker internal Campfire messages Various dates GAWKER 01536_C-01572_C			
142.	Gawker Editorial Resources – Editorial Wiki GAWKER 01573-01607			

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143.	Gawker Editorial Resources – Tracking Uniques GAWKER 01579-01580			
144.	Email from the subject of a Deadspin article to various Gawker staff members May 11, 2010 GAWKER 20097_C			
145.	Gawker Media website preservation GAWKER 23133-23282			
146.	Gawker Media Group Non-Disclosure Agreement GAWKER 23398_C-23399_C			
147.	Gawker Media Group form employment contract GAWKER 23400_C-23409_C			
148.	Bank Statements for Gawker Various dates GAWKER 24389_C-24398_C			
149.	Email from Bob Ryder to Jules Wortman September 7, 2012 TNA-G0011			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
150.	Gawker Media Group, Inc. and Subsidiaries Consolidated Financial Statements for Years Ended December 31, 2011 and 2010 YAC000001-0000044			
151.	First Amended Complaint December 28, 2012			
152.	Expert Report of Mike Foley March 6, 2015			
153.	Expert Report of Jeff Anderson March 5, 2015			
154.	Curriculum Vitae of Jeff Anderson			
155.	Exhibits to Expert Report of Jeff Anderson			
156.	Expert Witness Disclosure of Defendants Gawker Media, LLC, Nick Denton, and A.J. Daulerio March 6, 2015			
157.	Rebuttal Expert Witness Disclosure of Defendants Gawker Media, LLC, Nick Denton, and A.J. Daulerio March 27, 2015			
158.	Response to Report of Jeff Anderson and Analysis of Economic Value Derived by Gawker Media As a Result of Publishing the Bollea Video by Peter C. Horan April 3, 2015			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
159.	Resume of Shanti Shunn			
160.	Expert Report regarding the accuracy of video counters, by Shanti Shunn April 4, 2016			
161.	YouTube Video View Counts			
162.	Other Video View Counts			
163.	Screenshot of source-code for CrazyShit.com			
164.	Screenshot of source-code for TMZ.com			
165.	Screenshot of source-code for DeviantClip.com			
166.	Expert Report regarding subscription fees, by Shanti Shunn March 5, 2012			
167.	Various documents relied upon by Shanti Shunn in support of report regarding subscription fees			
168.	Resume of Leslie John			
169.	University of Chicago Journal of Legal Studies – What Is Privacy Worth? June, 2013			
170.	NBC Rock Center – Gawker founder Nick Denton agrees website is ‘Snark... Sexual... Shameless... Mean (occasionally) March 6, 2012			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
171.	<p>Village Voice – Hulk Hogan Sues Gawker Over Leaked Sex Tape Co-Starring His Friend’s Wife</p> <p>October 16, 2012</p>			
172.	<p>Deadspin – ESPN Lawyers Try To Smoke Out Creepy Amateur Peephole Videographer (Update)</p> <p>July 17, 2009</p>			
173.	<p>Selected social media postings of Kevin Blatt</p> <p>Various dates</p> <p>Subsequently produced as BOLLEA006181-006294, 006295-006341</p>			
174.	<p>TheMorningNews.org – Paris Hilton and the American Cannibal</p> <p>April 27, 2006</p> <p>BOLLEA 004838-004855</p>			
175.	<p>AVN.com – Houston’s Labia Operation</p> <p>April 11, 2010</p> <p>BOLLEA 004856-004857</p>			
176.	<p>XBIZ.com – Adult Entertainment News</p> <p>April 23, 2006</p> <p>BOLLEA 004858-004860</p>			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
177.	XBIZ – Celebrity Sex Tapes, Parts 1 and 2 January 12, 2015; January 13, 2015 BOLLEA 004861-004868			
178.	TVFanatic – Kevin Blatt Seeks Contestants to Enter Virgin Territory May 8, 2007 BOLLEA 004869-004874			
179.	FoxNews.com – Negotiations continue over Verne Troyer sex tape July 11, 2008 BOLLEA 004875			
180.	NYMag.com – Say Hello to Kevin Blatt, Hollywood’s Sex-Tape Broker November 13, 2009 BOLLEA 004876-004878			
181.	ABCNews.com – An Inside Look at the Celebrity Sex Tape Industry June 3, 2010 BOLLEA 004879-004882			
182.	Cleveland.com – From Charlie Sheen’s porn-star trysts to Paris Hilton’s sex tape, Kevin Blatt aims to be the Charles Schwab of celebrity dirt January 17, 2012 BOLLEA 004883-004895			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
183.	XBIZ.com – Sex Tape Broker Kevin Blatt’s ‘Bachelor’ Lawsuit Dismissed May 30, 2012 BOLLEA 004896-004898			
184.	ABCNews.com – Do Sex Tapes Give Stars’ Careers a Boost? BOLLEA 004899-004901			
185.	Twitter post by Kevin Blatt February 14, 2015 BOLLEA 004902-004903			
186.	Sarah Peachez’s Twitter page BOLLEA 004904-004909			
187.	KevinBlatt.com – About Kevin Blatt BOLLEA 004910-004911			
188.	KevinBlatt.com – Celebrities BOLLEA 004912-004917			
189.	Various documents from <i>Coring v. Blatt</i> BOLLEA 004918-004931			
190.	Various documents from <i>Maley v. Blatt</i> BOLLEA 004932-004959			
191.	Various documents from <i>Papa v. Blatt</i> BOLLEA 004960-005033			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
192.	Various documents from <i>Nguyen v. Blatt</i> BOLLEA 005034-005050			
193.	Complaint in <i>Troyer v. Blatt</i> June 26, 2008 BOLLEA 005051-005072			
194.	Fleshbot.com – Calling Dr. Love (To Please Euthanize Us): The “Gene Simmons Sex Tape” February 19, 2008 BOLLEA 005073-005080			
195.	Gawker.com – How Gene Simmons’ Sex Tape Is the Fairytale Romance of Our Time February 20, 2008 BOLLEA 005081-005101			
196.	Gawker.com – Sex Tape Of The Day February 20, 2008 BOLLEA 005102-005107			
197.	RollingStone.com – Pam and Tommy: The Untold Story of the World’s Most Famous Sex Tape December 22, 2014 BOLLEA 005108-005141			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
198.	Translated documents relating to the finances of Kinja KFT BOLLEA 004748-004775; 006431-006442			
199.	Gawker Media LLC Balance Sheets for June 2013, and for the years 2010, 2011 and 2012 GAWKER 01431_C-01434_C			
200.	Gawker Media LLC Revenue by Month, from January 2010 to June 2013 GAWKER 01439_C			
201.	Gawker Media LLC Balance Sheets for February 2014 and for the year 2013 GAWKER 18319_C-18320_C			
202.	Gawker Media LLC Income Statement from January 2010 to February 2014 GAWKER 18323_C			
203.	Gawker Media LLC Balance Sheet as of May 31, 2014 GAWKER 23413_C			
204.	Gawker Media LLC Income Statement FY 14 GAWKER 23414_C			
205.	Gawker Media LLC Revenue by Month, January 2010 to May 2014 GAWKER 23415_C			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
206.	Revenue by Month for Gawker Media LLC websites, January 2010 to December 2014 GAWKER 24324_C-24331_C			
207.	Untranslated documents relating to finances of Kinja KFT GAWKER 24332_C-24347_C			
208.	Gawker Media Group, Inc. and Subsidiaries Consolidated Financial Statements for Years Ended December 31, 2011 and 2010 GAWKER 24348_C-24359_C			
209.	Gawker Media Group, Inc. and Subsidiaries Consolidated Financial Statements for Year Ended December 31, 2012 GAWKER 24360_C-24371_C			
210.	Gawker Media Group, Inc. and Subsidiaries Consolidated Financial Statements for Year Ended December 31, 2013 GAWKER 24372_C-24388_C			
211.	Google Analytics preservation October 4, 2012 to June 30, 2013 GAWKER 01148			
212.	Google Analytics preservation January 1, 2012 to December 31, 2012 GAWKER 01149			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
213.	Preservation of Quantcast.com statistics for Gawker.com GAWKER 001150-001151			
214.	Preservation of Quantcast.com statistics for Gawker.com GAWKER 01152			
215.	Preservation of Quantcast.com statistics for Gawker.com GAWKER 01154-001155			
216.	Preservation of Quantcast.com statistics for Gawker.com GAWKER 01156			
217.	Statistics for “HOGAN-SEX-TAPE-ACTUAL-FINAL-CUT” October 4, 2012 GAWKER 01185			
218.	Google Analytics preservation January 1, 2013 to October 31, 2013 GAWKER 18331			
219.	Google Analytics preservation November 31, 2013 to March 20, 2014 GAWKER 18332			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
220.	Google Analytics preservation June 30, 2013 to March 16, 2014 GAWKER 18333			
221.	Google Analytics preservation January 1, 2011 to June 30, 2014 GAWKER 23283_C-23286_C			
222.	Google Analytics preservation March 21, 2014 to June 30, 2014 GAWKER 23410			
223.	Google Analytics preservation March 17, 2014 to June 30, 2014 GAWKER 23411			
224.	Video – Re/code Interview of Nick Denton BOLLEA 005333			
225.	Video – NBC Rock Center interview of Nick Denton BOLLEA 000731			
226.	Audio – Bubba Clem’s on-air apology to Terry Gene Bollea BOLLEA001058			
227.	Marital Settlement Agreement between Bubba and Heather Clem February 13, 2012			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
228.	Email from bubbabr@gmail.com to "Heather" April 19, 2012			
229.	Email from Heather Clem to "Bubba," and Thomas J. Bean April 2012			
230.	Emails between Tony Burton and AJ Daulerio September-October, 2012 DBA 0065-0068 Redacted per the Court's April 22, 2015 Order			
231.	Photographs of Bubba Clem's bedroom			
232.	Top 500 Gawker stories, as of 6-21-2013 GAWKER 01175-84			
233.	Kinja Legal – Content Guidelines BOLLEA 002693			
234.	NYMag.com – A.J. Daulerio Would Have Gone to Jail for Brett Favre's Penis January 19, 2011 BOLLEA 004272-004279			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
235.	<p>PopMatters.com – The First Amendment Bubble: How Privacy and Paparazzi Threaten a Free Press</p> <p>January 16, 2015</p> <p>BOLLEA 006372-006380</p>			
236.	<p>Raw data provided in support of Expert Report of Prof. Leslie John</p>			
237.	<p>Expert Report of Prof. Leslie John</p> <p>May 20, 2015</p>			
238.	<p>Google Trends data prepared by Shanti Shunn in support of report on video counters.</p>			
239.	<p>JournalistsResource.org – Beyond “he said, she said” journalism: Using research to inform the debate over 12 controversial issues.</p> <p>August 13, 2014</p> <p>BOLLEA 005559-005561</p>			
240.	<p>TampaBay.com – Ex-swim coach to face old case</p> <p>December 24, 2008</p> <p>BOLLEA 005562-005563</p>			
241.	<p>LATimes.com – Bathroom video, bullying led to teen’s suicide parents say</p> <p>July 14, 2014</p> <p>BOLLEA 005564-005565</p>			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
242.	WESH.com – Man accused of taping women in dressing room BOLLEA 005566-005567			
243.	BayNews9.com – Tampa CFO accused of secretly taping female employees March 22, 2014 BOLLEA 005568-005571			
244.	TampaBay.com – Spurred by Hillsborough case, Senate passes tougher penalties for video voyeurism February 14, 2012 BOLLEA 005572			
245.	TampaBay.com – Cops: Tampa executive filmed women using toilets and showering at his company (w/video) March 21, 2014 BOLLEA 005556-005557			
246.	DailyJournal.com – News media should draw a line, or the courts will September 9, 2014 BOLLEA 005573-005575			
247.	Emails between the subject of a Deadspin article, A.J. Daulerio and Gaby Darbyshire May 11, 2010 AJD 00036_C-00038_C			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
248.	Photographs of motion sensor, taken during the deposition of Bubba Clem BOLLEA 004657-004658			
249.	Gawker.com – ASU Student Wears the Most Shocking ‘Sexy’ Costume Ever: Nothing [NSFW] October 31, 2013 BOLLEA 002725-002728			
250.	Gawker.com – Ex-Deputy Mayor of London Posted Dick Pics on Facebook (NSFW) September 25, 2013 BOLLEA 002792-002803			
251.	Gawker.com – Christina Hendricks Says These Giant Naked Boobs Aren’t Hers, But Everything Else Is March 5, 2012 BOLLEA 002742-002749			
252.	TheRepublic.com – AP Newsbreak: Johns Hopkins pays \$190 million after gynecologist secretly recorded exams July 21, 2014 BOLLEA 004121-004122			
253.	Today.com - Gawker.com launches ‘stalker’ map May 21, 2006 BOLLEA 004003-004005			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
254.	<p>Gawker.com/Nick Denton - What is to be done?</p> <p>January 9, 2015</p> <p>BOLLEA 005401-005404</p>			
255.	<p>Gawker.com - Former Disney Star Sends Nude Pics to Girl, Girl Puts Them on Tumblr</p> <p>December 16, 2013</p> <p>BOLLEA 002821-002832</p>			
256.	<p>Gawker.com - Tech Bro's Google-Sponsored Trip to India Turns Into Naked Beach Romp [UPDATE]</p> <p>February 18, 2013</p> <p>BOLLEA 003278-003288</p>			
257.	<p>Defamer.Gawker.com - Teen Rocker Snapchats His Boner, Girl Uploads It For the World to See</p> <p>August 29, 2014</p> <p>BOLLEA 003313-003318</p>			
258.	<p>Gawker.com - This Week's Naked Celebrity Phone Pics: Glee's Heather Morris</p> <p>March 12, 2012</p> <p>BOLLEA 003533-003550</p>			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
259.	Deadspin - Blowjob In the Stands Livens Up Indoor Volleyball [NSFW] July 31, 2013 BOLLEA 003728-003729			
260.	Deadspin - Martellus Bennett Becomes Latest Player To Have Dong Shots Exposed By Scorned Female July 26, 2010 BOLLEA 003815-003819			
261.	Deadspin - More From the C-Roll Stash: Reverse Cowgirl In the Coliseum Cheap Seats (NSFW) September 20, 2011 BOLLEA 003839-003843			
262.	Jezebel - NBC News Producer Uploaded Secret Sex Tape of Girlfriend to Porn Site September 9, 2014 BOLLEA 004825-004827			
263.	Deadspin - Poor Lady Chiefs Fan Caught With Her Boobs Out After Post-Playoff Pity Hump (NSFW) (UPDATE) January 1, 2011 BOLLEA 003852-003861			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
264.	Deadspin - Roy Jones Jr's Sexting Technique is Very On-Brand [NSFW] June 11, 2014 BOLLEA 003865-003866			
265.	Deadspin - The C-Roll Stash, Part 1: Sex Above the SkyDome (NSFW) September 19, 2011 BOLLEA 003867-003871			
266.	Deadspin - The C-Roll's Happy Ending: A Back-Row Handjob At A Marlins Game (NSFW) September 27, 2011 BOLLEA 003881-003884			
267.	Deadspin - Video: A Couple Humped In A Yankee Bathroom Stall For About Three Innings On Saturday [NSFW] September 16, 2012 BOLLEA 003936-003953			
268.	Letter from David Houston to Gawker Media and Nick Denton October 5, 2012 GAWKER 00142-00144			
269.	Email from Cameron Stracher to David Houston October 9, 2012 GAWKER 00157			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
270.	Affidavit of Mike Foley June 20, 2014			
271.	Affidavit of Mike Foley May 3, 2015			
272.	SearchEngineJournal.com - Will Ask.com's Ad Campaign by Effective? May 3, 2007			
273.	Defendant Gawker Media, LLC's Responses to Plaintiff's First Request for Production of Documents July 25, 2013			
274.	Defendant Gawker Media, LLC's Responses to Plaintiff's First Set of Interrogatories July 25, 2013			
275.	Defendant Gawker Media, LLC's Responses to Plaintiff's Requests for Admission July 25, 2013			
276.	Defendant Gawker Media, LLC's Responses to Plaintiff's Second Request for Production of Documents August 12, 2013			
277.	Plaintiff Terry Gene Bollea's Responses to A.J. Daulerio's Interrogatories August 21, 2013			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
278.	Plaintiff Terry Gene Bollea's Responses to Gawker Media, LLC's Interrogatories August 21, 2013			
279.	Plaintiff Terry Gene Bollea's Responses to Gawker Media, LLC's Request for Production of Documents August 21, 2013			
280.	Defendant, Heather Clem/Cole's Notice of Filing Answers to Plaintiff, Terry Gene Bollea's Interrogatories September 19, 2013			
281.	Defendant, Heather Clem/Cole's Notice of Filing Answers to Plaintiff, Terry Gene Bollea's Request for Admissions September 19, 2013			
282.	Defendant, Heather Clem/Cole's Notice of Serving Responses to Plaintiff, Terry Gene Bollea's Request for Production September 19, 2013			
283.	Defendant Gawker Media, LLC's Supplemental Response to Plaintiff's Interrogatory No. 5 September 12, 2013			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
284.	Defendant, Heather Cole's, Response to Defendant, Gawker Media, LLC's First Request for Production of Documents November 21, 2013			
285.	Defendant, Heather Cole's, Response to Defendant, Gawker Media, LLC's Second Request for Production of Documents November 21, 2013			
286.	Objections of Defendant Gawker Media Group, Inc., Specially Appearing, To Plaintiff's First Set of Interrogatories December 12, 2013			
287.	Objections of Defendant Gawker Media Group, Inc., Specially Appearing, To Plaintiff's First Request for Production of Documents December 12, 2013			
288.	Defendant AJ Daulerio's Responses to Plaintiff's Request for Admissions December 20, 2013			
289.	Defendant AJ Daulerio's Responses to Plaintiff's First Set of Interrogatories December 20, 2013			
290.	Defendant AJ Daulerio's Responses to Plaintiff's First Request for Production of Documents December 20, 2013			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
291.	Defendant Gawker Media, LLC's Responses to Plaintiffs Third Request for Production of Documents December 20, 2013			
292.	Defendant Gawker Media's Responses to Plaintiff's Second Request for Admissions December 20, 2013			
293.	Plaintiff Terry Gene Bollea's Response to Second Set of Interrogatories Propounded by AJ Daulerio January 21, 2014			
294.	Plaintiff Terry Gene Bollea's Responses to Gawker Media, LLC's Second Request for Production of Documents January 21, 2014			
295.	Plaintiff Terry Gene Bollea's Responses to Gawker Media, LLC's Third Request for Production of Documents February 24, 2014			
296.	Plaintiff Terry Gene Bollea's Confidential Supplemental Responses to Interrogatory Nos. 9 and 10 Propounded by Gawker Media, LLC February 21, 2014			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
297.	Defendant AJ Daulerio's Responses to Plaintiff's First Supplemental Request for Production of Documents March 4, 2014			
298.	Defendant Gawker Media, LLC's Responses to Plaintiff's First Supplemental Request for Production of Documents March 4, 2014			
299.	Defendant Gawker Media, LLC's Supplemental Response to Plaintiff's Interrogatory No. 13 March 18, 2014			
300.	Plaintiff Terry Gene Bollea's Confidential Second Supplemental Response to Interrogatory No. 9 Propounded by AJ Daulerio May 16, 2014			
301.	Plaintiff Terry Gene Bollea's Confidential Third Supplemental Response to Interrogatory No. 10 Propounded by AJ Daulerio June 9, 2014			
302.	Plaintiff Terry Gene Bollea's Third Supplemental Response to Interrogatory No. 12 Propounded by Gawker Media, LLC June 24, 2014			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
303.	Defendant AJ Daulerio's Responses to Plaintiff's Second Request for Production of Documents July 11, 2014			
304.	Defendant AJ Daulerio's Responses to Plaintiff's Second Set of Interrogatories July 11, 2014			
305.	Defendant Gawker Media, LLC's Responses to Plaintiff's Fourth Request for Production of Documents July 11, 2014			
306.	Defendant Gawker Media, LLC's Responses to Plaintiff's Third Set of Interrogatories July 11, 2014			
307.	Defendant Nick Denton's Responses to Plaintiff's First Set of Interrogatories July 28, 2014			
308.	Defendant Nick Denton's Responses to Plaintiff's Request for Admissions July 28, 2014			
309.	Defendant Nick Denton's Responses to Plaintiff's First Request for Production of Documents July 28, 2014			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
310.	Plaintiff Terry Gene Bollea's Responses to Gawker Media, LLC's Fourth Request for Production of Documents October 15, 2014			
311.	Plaintiff Terry Gene Bollea's Responses to Defendant Nick Denton's First Set of Interrogatories October 15, 2014			
312.	Exhibit to Plaintiff Terry Gene Bollea's Responses to Defendant Nick Denton's First Set of Interrogatories October 15, 2014			
313.	Plaintiff Terry Gene Bollea's Responses to Defendant Nick Denton's Second Set of Interrogatories November 11, 2014			
314.	Defendant AJ Daulerio's Responses to Plaintiff's Third Request for Production of Documents January 20, 2015			
315.	Plaintiff Terry Gene Bollea's Responses to Defendant Nick Denton's Third Set of Interrogatories January 22, 2015			
316.	Plaintiff Terry Gene Bollea's Responses to Gawker Media, LLC's Fifth Request for Production of Documents January 22, 2015			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
317.	Defendant Gawker Media, LLC's Responses to Plaintiff's Fifth Request for Production of Documents February 2, 2015			
318.	Defendant Gawker Media, LLC's Confidential Supplemental Responses to Plaintiff's Interrogatory Nos. 18-19 and Request for Production No. 126 Pursuant to December 17, 2014 Order February 2, 2015			
319.	Defendant Gawker Media, LLC's Responses to Plaintiff's Fourth Set of Interrogatories February 2, 2015			
320.	Plaintiff Terry Gene Bollea's Supplemental Responses to Defendant Nick Denton's Third Set of Interrogatories, Nos. 22-14 February 5, 2015			
321.	Plaintiff Terry Gene Bollea's Fourth Supplemental Response to Interrogatory No. 12 Propounded by Gawker Media, LLC March 6, 2015			
322.	Plaintiff Terry Gene Bollea's Responses to Gawker Media, LLC's Sixth Request for Production of Documents April 9, 2015			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
323.	Plaintiff Terry Gene Bollea's Responses to Gawker Media, LLC's First Request for Admissions April 9, 2015			
324.	Plaintiff Terry Gene Bollea's Responses to Gawker Media, LLC's Second Request for Admissions April 9, 2015			
325.	Defendant Gawker Media, LLC's Responses to Plaintiff's Sixth Request for Production of Documents April 10, 2015			
326.	Defendant Gawker Media, LLC's Responses to Plaintiff's Third Request for Admissions April 10, 2015			
327.	Defendant AJ Daulerio's Responses to Financial Worth Interrogatories June 4, 2014			
328.	Defendant Nick Denton's Responses to Financial Worth Interrogatories June 4, 2014			
329.	Defendant Gawker Media, LLC's Responses to Financial Worth Interrogatories June 4, 2014			
330.	Verification August 22, 2013			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
331.	Verification December 3, 2013			
332.	Verification February 21, 2014			
333.	Verification May 30, 2014			
334.	Verification June 11, 2014			
335.	Verification July 2, 2014			
336.	Verification October 22, 2014			
337.	Verification November 12, 2013			
338.	Verification February 10, 2015			
339.	Verification February 10, 2015			
340.	Verification March 13, 2015			
341.	Verification April 22, 2015			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
342.	Verification April 27, 2015			
343.	Deposition transcript of Jules Wortman April 7, 2015			
344.	Deposition transcript of AJ Daulerio September 30, 2013			
345.	Deposition transcript of Emma Carmichael March 5, 2015			
346.	Deposition transcript of John Cook April 15, 2015			
347.	Deposition transcript of Scott Kidder October 1, 2013			
348.	Deposition transcript of Scott Kidder April 14, 2015			
349.	Deposition transcript of Peter Horan April 23, 2015			
350.	Deposition transcript of Andrew Gorenstein March 3, 2015			
351.	Deposition transcript of Erin Pettigrew March 4, 2015			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
352.	Deposition transcript of Kevin Blatt March 25, 2015			
353.	Deposition transcript of Nick Denton October 2, 2013			
354.	Deposition transcript of Elizabeth Rosenthal Traub March 2, 2015			
355.	Deposition transcript of David Rice March 9, 2015			
356.	Deposition transcript of Tony Burton March 2, 2015			
357.	Deposition transcript of Michael Kuntz March 3, 2015			
358.	Deposition transcript of Tom Plunkett March 5, 2015			
359.	All transcripts of and exhibits to depositions yet to be conducted in this case concerning Defendants' financial worth.			
360.	Any documents rendered relevant by the Court's subsequent rulings on motions in limine and/or the parties' respective Daubert motions.			
361.	All pleadings filed by Plaintiff and Defendants in this proceeding.			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
362.	Any and all exhibits listed by Defendants and any and all exhibits otherwise identified by all parties to this matter are incorporated herein; with full reservation of all objections to such exhibits.			
363.	Any and all exhibits reasonably required and necessary for rebuttal and/or impeachment purposes, which are not reasonably contemplated at this time.			
364.	Any and all documents referenced or identified in any pleadings, motions, answers to interrogatories, responses to requests for production, or depositions in the above-styled proceeding.			
365.	Demonstrative enlargements or projections of all listed exhibits.			

Plaintiff reserves his right to supplement these disclosures to include additional exhibits associated with Defendants’ financial worth discovery, including without limitation, the financial worth depositions of A.J. Daulerio, Nick Denton and Gawker Media LLC, as well as interrogatories and requests for production served by Plaintiff concerning Defendants’ financial worth. These depositions and discovery likely will reveal the existence of additional exhibits to be used at trial.

DATED: June 8, 2015.

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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 8th Day of June, 2015 to the following:

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