## 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 SUPPLEMENTAL EXHIBIT LIST

Plaintiff, Terry Gene Bollea, professionally known as Hulk Hogan, by counsel, submits the following list of exhibits for trial:

No.	Exhibit	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>	
1101	No.					

<sup>&</sup>lt;sup>1</sup> The descriptions provided for each exhibit herein are intended to be descriptive in nature only and are not binding on Plaintiff.

<sup>2</sup> 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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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			
3.	Gawker.com articles:			
	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)			
	BOLLEA 000445-000447			
4.	Deadspin.com – The Iron Sheik: Hulk Hogan Sex Tape Proves "He Have Grasshopper Dick"			
	October 7, 2012			
	BOLLEA 000448-000450			

Exhibit	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
No.	NT			
5.	Non-party websites exhibiting the			
	Gawker produced sex video.			
	DOLLEA 000450 000461 000462			
	BOLLEA 000459, 000461-000462, 000464-000467, 000470, 000472-			
	000473, 000478-000484, 000488-			
	000494, 000500-000501, 000604-			
	000605			
	000003			
6.	Deadspin.com – Brett Favre's			
	Cellphone Seduction of Jenn Sterger			
	(Update)			
	October 7, 2010			
	Subsequently produced as			
	BOLLEA 000676-000677			
	Carden There Taylor Dhate			
7.	Gawker.com – These Topless Photos of Kate Middleton Put Us as Two for			
	Three on Royal Nudie Pic Scandals			
	[NSFW] (Update)			
	[[NSI W] (Opdate)			
	September 14, 2012			
	2 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0			
	Subsequently produced as			
	BOLLEA 000678-000681			
8.	GQ.com – The Worldwide Leader in			
	Dong Shots			
	7.1			
	February 2011			
	Subsequently must be added			
	Subsequently produced as BOLLEA 000682-000686			
	BOLLEA 000062-000060			
1		1		i .

Exhibit	Description 1	Date Identified	Date Admitted	Objections <sup>2</sup>
No.	r			
9.	NYMag.com – Nick Denton Using His Own Love Life to Plug Hulk Hogan Sex Tape  October 8, 2012			
	Subsequently produced as BOLLEA 000687-000688			
10.	TheGuardian.com – Gawk, don't talk  December 1, 2006			
	Subsequently produced as BOLLEA 000699-000703			
11.	Gawker.com – Fred Durst: Touch My Balls And Ass And Then Sue Gawker			
	Subsequently produced as BOLLEA 000704-000705			
12.	Wired.com – Nick Denton Is in Your Head			
	April 16, 2013 Subsequently produced as			
	BOLLEA 000709			
13.	CBS News – Rebecca Gayheart, "McSteamy" Eric Dane, Get Gawker Settlement Over Threesome Video			
	August 4, 2010			
	Subsequently produced as BOLLEA 000710-000711			

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
14.	NewYorker.com – Search and Destroy			
	October 18, 2010			
	Subsequently produced as BOLLEA 000712-000730			
15.	Letter from Steven Hirsch to Hulk Hogan, c/o David Houston			
	BOLLEA 000779			
16.	Letter from Martin Ellison, Sex.com, to David Houston			
	BOLLEA 001057			
17.	Email from Jules Wortman to Terry Bollea			
	October 3, 2012			
	BOLLEA 001060-67			
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			

Exhibit	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
No.	_			-
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			
23.	Gawker.com articles			
	<ol> <li>ISIS Beheads American Journalist James Foley in Video Message to U.S. (August 19, 2014)</li> <li>Algerian Fighters Linked to ISIS Behead French Hostage in Video (September 24, 2014)</li> <li>ISIS Beheads Japanese Hostage Kinji Goto in New Video (January 31, 2015)</li> <li>ISIS Claims to Have Beheaded Third American Hostage in New Video (November 16, 2014)</li> <li>ISIS Reportedly Burns Captured Jordanian Pilot Alive (February 3, 2015)</li> </ol>			
	BOLLEA 002942-002981, 004798- 004824			

Exhibit No.	Description <sup>T</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
No. 24.	Gawker.com articles:  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)  BOLLEA 003256-003277, 000364-003577			
25.	Gawker.com – The 13 Most Powerful Images of Naked Celebrities of 2012  December 5, 2012  BOLLEA 003406-003419			
26.	Gawker.com – What happened to the stock option program?  August 26, 2014  BOLLEA 003627-003636			
27.	Archive.org – Bathroom Sex Pandemic Reaches The Damp Floor of Indiana Sports Bar (UPDATE) BOLLEA 003725			
28.	Deadspin.com – Cocaine, Suicide, Women, and Guns: An A.J. Daulerio Story  January 4, 2012  BOLLEA 003737-003746			

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
29.	Gizmodo.com – This is Apple's Next iPhone			
	April 19, 2010			
	BOLLEA 003898-003925			
30.	PlayboySFW.Kinja.com – The Playboy Interview: A Candid Conversation with Gawker's Nick Denton			
	February 21, 2014			
	BOLLEA 004089-004107			
31.	The Daily Beast – The Gospel According to Nick Denton—What Next For The Gawker Founder?			
	December 14, 2014			
	BOLLEA 004113-004120			
32.	CapitalNewYork.com – No phones, Twitter, Instagram allowed at Nick Denton's wedding			
	May 13, 2014			
	BOLLEA 004131-004133			
33.	Gawker.com/Matt Hardigree – How Gawker Media Blew Up The Traditional News Business			
	March 18, 2013			
	BOLLEA 004206-004212			

Exhibit	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
No.				
34.	Gawker.com – The Writer Nick			
	Denton Couldn't Let Go (And Then			
	Secretly Smeared)			
	April 30, 2009			
	BOLLEA 004230-004241			
35.	Observer.com – Gossip Guys: Nick			
	Denton and Michael Wolff Teach			
	Teenage Girls to Survive			
	October 6, 2014			
	October 6, 2014			
	BOLLEA 004242-004245			
36.	Watchdog.org – The Gawkerization of			
50.	the media			
	December 13, 2013			
	BOLLEA 004253-004256			
37.	WashingtonPost.com – Gawker			
	Widens Its Withering Gaze			
	June 22, 2009			
	BOLLEA 004269-004271			
	BOLLEA 004209-0042/1			
38.	Gizmodo.com – At Last, This Revenge			
	Porn Kingpin Has Been Stopped			
	January 29, 2015			
	DOLLEA 004200 004202			
	BOLLEA 004280-004282			
		<u> </u>		

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
39.	DailyFinance.com – How Checkbook Journalism Gave Gizmodo Its iPhone Scoop			
	April 19, 2010			
	BOLLEA 004296-004298			
40.	Gawker Media Management			
	BOLLEA 004411-004414			
41.	International Business Times – Gawker Media Hopes To Spur E-Commerce Revenue with "Commerce Journalism," Says Nick Denton January 24, 2013 BOLLEA 004415-004416			
42.	BusinessInsider.com – Gawker Media			
42.	Generated \$45 Million In Net Revenue Last Year And It's Raising A \$15 Million Round of Debt			
	January 28, 2015			
	BOLLEA 004419-004425			
43.	NPR.org – Gawker Wants To Offer More Than Snark, Gossip			
	January 3, 2011			
	BOLLEA 004433-004436			
44.	CNET.com – How Gizmodo escaped indictment in iPhone prototype deal			
	October 12, 2011			
	BOLLEA 004454-004461			

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
45.	TheAwl.com – Inside Gawker Media's First Company-Wife Meeting			
	September 8, 2011			
	BOLLEA 004470-004477			
46.	YouTube.com – John Cook (Former Editor-in-Chief at Gawker) on "Ethics in Journalism #GamerGate Uploaded: November 8, 2014			
	Originally aired: April 4, 2014 BOLLEA 004502-004503			
47.	Video found at YouTube.com – John Cook (Former Editor-in-Chief at Gawker) on "Ethics in Journalism #GamerGate			
	BOLLEA 004504			
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			

Exhibit	Description <sup>T</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
No. 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			
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			

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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			
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			

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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			
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			

Exhibit No.	Description	Date Identified	Date Admitted	Objections <sup>2</sup>
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			
71.	Gawker.com – One Woman's Crusade Against Revenge Porn			
	May 1, 2013			
	BOLLEA 005216-005223			
72.	Gawker.com – A Judge Told Us to Take Down Our Hulk Hogan Sex Tape Post. We Won't.			
	April 25, 2013			
	BOLLEA 005224-005231			

Exhibit	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
No.	1			,
73.	Gawker.com – Ladies: 8,000 Creeps on Reddit Are Sharing the Nude Photos You Posted to Photobucket August 8, 2012			
	August 6, 2012			
	BOLLEA 005244-005257			
74.	Gawker.com – Pervy Flesh-Peddler Bill O'Reilly Plays Erin Andrews Peephole Video On-Air July 23, 2009			
	BOLLEA 005258-005263			
75.	Complaint for Copyright Infringement and Demand for Jury Trial in <i>Dane</i> , <i>Gayheart v. Gawker Media</i> , <i>LLC et al</i> .			
	September 23, 2009			
	BOLLEA 005334-005340			
76.	TheGate – The New News: Ethics' Place in the Digital World			
	February 16, 2015			
	BOLLEA 005344-005347			
77.	Post on Nick Denton's Twitter account			
	September 23, 2009			
	BOLLEA 005348			

Exhibit	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
No. 78.	NYDailyNews – Rebecca Gayheart and husband Eric Dane win settlement over sex tape posted on Gawker			
	August 4, 2010			
	BOLLEA 005349-005350			
79.	Society of Professional Journalists Code of Ethics			
	BOLLEA 005558			
80.	Business Insider – AOL Hopes To Turn A Profits On Huffington Post Next Year			
	December 23, 2013			
	Subsequently produced as BOLLEA 005589-005592			
81.	TheAwl.com – Gawker Media Moves To Uniques: Be "Even More of a Hustler" Says Nick Denton			
	January 5, 2010			
	Subsequently produced as BOLLEA 005610-005638			
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			

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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			
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			

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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			
94.	StackOverflow.com – Tracking YouTube player embedded video view count			
	October 15, 2013			
	BOLLEA 006396			
95.	StackOverflow.com – How can I track a click event of an embedded video (youtube, vimeo, etc.)? (to track play count)			
	August 31, 2011			
	BOLLEA 006397-006399			

Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
GQ magazine			
February, 2011			
BOLLEA 006401			
Plaintiff previously provided a copy of this exhibit to Defendants and will not be providing any additional copies with this list.			
New Yorker magazine			
October, 2010			
BOLLEA 006402			
Plaintiff previously provided a copy of this exhibit to Defendants and will not be providing any additional copies with this list.			
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.			
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.			
	GQ magazine February, 2011 BOLLEA 006401 Plaintiff previously provided a copy of this exhibit to Defendants and will not be providing any additional copies with this list.  New Yorker magazine October, 2010 BOLLEA 006402 Plaintiff previously provided a copy of this exhibit to Defendants and will not be providing any additional copies with this list.  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.  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.	GQ magazine February, 2011 BOLLEA 006401 Plaintiff previously provided a copy of this exhibit to Defendants and will not be providing any additional copies with this list.  New Yorker magazine October, 2010 BOLLEA 006402 Plaintiff previously provided a copy of this exhibit to Defendants and will not be providing any additional copies with this list.  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.  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.	GQ magazine February, 2011 BOLLEA 006401 Plaintiff previously provided a copy of this exhibit to Defendants and will not be providing any additional copies with this list.  New Yorker magazine October, 2010 BOLLEA 006402 Plaintiff previously provided a copy of this exhibit to Defendants and will not be providing any additional copies with this list.  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.  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.

Exhibit	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
No. 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			
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			

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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			
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			

Exhibit No.	Description <sup>T</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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			
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			

Exhibit No.	Description <sup>T</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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			
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			
		I .	l	l

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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			
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			

Exhibit No.	Description	Date Identified	Date Admitted	Objections <sup>2</sup>
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			
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			

Exhibit No.	Description <sup>T</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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			
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			

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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			
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			

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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			
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			

Exhibit No.	Description <sup>T</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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			
171.	Village Voice – Hulk Hogan Sues Gawker Over Leaked Sex Tape Co- Starring His Friend's Wife			
	October 16, 2012			
172.	Deadspin – ESPN Lawyers Try To Smoke Out Creepy Amateur Peephole Videographer (Update)			
	July 17, 2009			
173.	Selected social media postings of Kevin Blatt			
	Various dates			
	Subsequently produced as BOLLEA006181-006294, 006295-006341			

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
174.	TheMorningNews.org – Paris Hilton and the American Cannibal			
	April 27, 2006			
	BOLLEA 004838-004855			
175.	AVN.com – Houston's Labia Operation			
	April 11, 2010			
	BOLLEA 004856-004857			
176.	XBIZ.com – Adult Entertainment News			
	April 23, 2006			
	BOLLEA 004858-004860			
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			

Exhibit No.	Description	Date Identified	Date Admitted	Objections <sup>2</sup>
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			
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			

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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 Maley v. Blatt			
	BOLLEA 004932-004959			
191.	Various documents from Papa v. Blatt			
	BOLLEA 004960-005033			
192.	Various documents from <i>Nguyen v. Blatt</i>			
	BOLLEA 005034-005050			
193.	Complaint in Troyer v. Blatt			
	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			

Exhibit	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
No.				
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			
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			

Exhibit	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
No. 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			
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			

Exhibit No.	Description	Date Identified	Date Admitted	Objections <sup>2</sup>
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			
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			

Exhibit	Description <sup>T</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
No.				
216.	`			
	statistics for Gawker.com			
	GAWKER 01156			
217.	Statistics for "HOGAN-SEX-TAPE-			
	ACTUAL-FINAL-CUT"			
	October 4, 2012			
	CANACED 01107			
	GAWKER 01185			
210	Cooole Analytics programation			
218.	Google Analytics preservation			
	January 1, 2013 to October 31, 2013			
	January 1, 2013 to October 31, 2013			
	GAWKER 18331			
	GAWKER 16551			
219.	Google Analytics preservation			
217.	Google 7 maryties preservation			
	November 31, 2013 to March 20, 2014			
	1.0.0.000 2.1, 2012 to 1.1000 20, 201			
	GAWKER 18332			
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			
	N. 1 21 2014 . T 22 2014			
	March 21, 2014 to June 30, 2014			
	CAWWED 22410			
	GAWKER 23410			

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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			
228.	Email from bubbabrn@gmail.com to "Heather"			
	April 19, 2012			
229.	Email from Heather Clem to "Bubba," and Thomas J. Bean			
	April 2012			

Exhibit No.	Description	Date Identified	Date Admitted	Objections <sup>2</sup>
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			
235.	PopMatters.com – The First Amendment Bubble: How Privacy and Paparazzi Threaten a Free Press			
	January 16, 2015			
	BOLLEA 006372-006380			
236.	Raw data provided in support of Expert Report of Prof. Leslie John			
237.	Expert Report of Prof. Leslie John			
	May 20, 2015			

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
238.	Google Trends data prepared by Shanti Shunn in support of report on video counters.			
239.	JournalistsResource.org – Beyond "he said, she said" journalism: Using research to inform the debate over 12 controversial issues.			
	August 13, 2014			
	BOLLEA 005559-005561			
240.	TampaBay.com – Ex-swim coach to face old case			
	December 24, 2008			
	BOLLEA 005562-005563			
241.	LATimes.com – Bathroom video, bullying led to teen's suicide parents say			
	July 14, 2014			
	BOLLEA 005564-005565			
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			

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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			
248.	Photographs of motion sensor, taken during the deposition of Bubba Clem			
	BOLLEA 004657-004658			

Exhibit	Description	Date Identified	Date Admitted	Objections <sup>2</sup>
No.				
249.				
	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)			
	a			
	September 25, 2013			
	BOLLEA 002792-002803			
	BOLLLA 002/72-002803			
251.	Gawker.com – Christina Hendricks			
	Says These Giant Naked Boobs Aren't			
	Hers, But Everything Else Is			
	March 5, 2012			
	BOLLEA 002742-002749			
	BOLLEA 002/42-002/49			
252.	TheRepublic.com – AP Newsbreak:			
	Johns Hopkins pays \$190 million after			
	gynecologist secretly recorded exams			
	- <del>-</del>			
	July 21, 2014			
	DOLLEA 004121 004122			
	BOLLEA 004121-004122			
253.	Today.com - Gawker.com launches			
	'stalker' map			
	•			
	May 21, 2006			
	BOLLEA 004003-004005			
	DOLLEA 004003-004003			
			L	I

Exhibit	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
No.				
254.	Gawker.com/Nick Denton - What is to			
	be done?			
	January 9, 2015			
	• ,			
	BOLLEA 005401-005404			
255.	Gawker.com - Former Disney Star			
	Sends Nude Pics to Girl, Girl Puts			
	Them on Tumblr			
	December 16, 2013			
	BOLLEA 002821-002832			
256.	9			
	Sponsored Trip to India Turns Into			
	Naked Beach Romp [UPDATE]			
	February 18, 2013			
	1 cordary 10, 2013			
	BOLLEA 003278-003288			
257.	Defamer.Gawker.com - Teen Rocker			
	Snapchats His Boner, Girl Uploads It			
	For the World to See			
	August 20, 2014			
	August 29, 2014			
	BOLLEA 003313-003318			
258.	Gawker.com - This Week's Naked			
	Celebrity Phone Pics: Glee's Heather			
	Morris			
	March 12, 2012			
	BOLLEA 003533-003550			

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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	Description	Date Identified	Date Admitted	Objections <sup>2</sup>
No. 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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
No. 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	Description	Date Identified	Date Admitted	Objections <sup>2</sup>
No.	2000.			constant
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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
303.	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 <sup>T</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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.				
319.	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	Description	Date Identified	Date Admitted	Objections <sup>2</sup>
No. 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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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 <sup>T</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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.			

Any and all exhibits listed by			
Defendants and any and all exhibits otherwise identified by all parties to his matter are incorporated herein; with full reservation of all objections to such exhibits.			
Any and all exhibits reasonably equired and necessary for rebuttal and/or impeachment purposes, which are not reasonably contemplated at this ime.			
Any and all documents referenced or dentified in any pleadings, motions, unswers to interrogatories, responses to requests for production, or depositions in the above-styled proceeding.			
Demonstrative enlargements or projections of all listed exhibits.			
SUPPLEMENTA	AL EXHIBITS		
Nick Denton (Nick.Kinja.com) – The Price of Free Journalism			
Tune 12, 2015			
BOLLEA 006868-006874			
CapitalNewYork.com – Gawker in the ight of its life with Hulk Hogan sexape suit			
Tune 12, 2015			
BOLLEA 006875-006881			
of hwar Actualist Adduced Don Live State S	therwise identified by all parties to his matter are incorporated herein; with full reservation of all objections to each exhibits.  In any and all exhibits reasonably equired and necessary for rebuttal and/or impeachment purposes, which are not reasonably contemplated at this me.  In any and all documents referenced or dentified in any pleadings, motions, asswers to interrogatories, responses to equests for production, or depositions at the above-styled proceeding.  Supplementative enlargements or rejections of all listed exhibits.  Supplementative of Free Journalism  Lick Denton (Nick.Kinja.com) – The rice of Free Journalism  Line 12, 2015  OLLEA 006868–006874  PapitalNewYork.com – Gawker in the ght of its life with Hulk Hogan sexape suit  Line 12, 2015	therwise identified by all parties to his matter are incorporated herein; with full reservation of all objections to each exhibits.  In y and all exhibits reasonably equired and necessary for rebuttal and/or impeachment purposes, which are not reasonably contemplated at this me.  In y and all documents referenced or dentified in any pleadings, motions, asswers to interrogatories, responses to equests for production, or depositions in the above-styled proceeding.  It is above-styled proceeding.  SUPPLEMENTAL EXHIBITS  It is Denton (Nick.Kinja.com) — The rice of Free Journalism  In 12, 2015  OLLEA 006868–006874  SapitalNewYork.com — Gawker in the ght of its life with Hulk Hogan sexape suit  In 12, 2015	therwise identified by all parties to his matter are incorporated herein; with full reservation of all objections to each exhibits.  In any and all exhibits reasonably equired and necessary for rebuttal and/or impeachment purposes, which are not reasonably contemplated at this me.  In any and all documents referenced or elentified in any pleadings, motions, asswers to interrogatories, responses to equests for production, or depositions in the above-styled proceeding.  SUPPLEMENTAL EXHIBITS  Fick Denton (Nick.Kinja.com) – The rice of Free Journalism  In 12, 2015  OLLEA 006868–006874  FapitalNewYork.com – Gawker in the ght of its life with Hulk Hogan sexupe suit  In 12, 2015

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
368.	NYTimes.com – Gawker's Moment of Truth			
	June 12, 2015			
	BOLLEA 006882-006892			
369.	CapitalNewYork.com – Nick Denton steps down as Gawker president, names seven-person managing board			
	December 10, 2014			
	BOLLEA 006892 A-006902 A			
370.	NYTimes.com – Two Paths to the Same Destination			
	June 6, 2014			
	BOLLEA 006903 A-006909 A			
371.	TechCrunch.com – Vox Media Raises \$46.5M At A Reported \$380M Valuation			
	November 30, 2014			
	BOLLEA 006910 A-006914 A			
372.	VentureDeal.com – Albert Daulerio			
	Subsequently produced as BOLLEA 006915			

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
373.	CapitalNewYork.com – A.J. Daulerio to start up 'Ratter'			
	March 28, 2014			
	Subsequently produced as BOLLEA 006916–6918			
374.	Post on Nick Denton's Twitter Account			
	June 12, 2015			
	BOLLEA 006919			
375.	Post on Nick Denton's Twitter Account			
	June 13, 2015			
	BOLLEA 006920-006921			
376.	Post on Nick Denton's Twitter Account			
	June 13, 2015			
	BOLLEA 006922-006926			
377.	Post on Nick Denton's Twitter Account			
	June 13, 2015			
	BOLLEA 006927–006929			

Exhibit No.	Description <sup>T</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
378.	Post on Nick Denton's Twitter Account			
	June 12, 2015			
	BOLLEA 006930-006931			
379.	Post on Nick Denton's Twitter Account			
	June 12, 2015			
	BOLLEA 006932-006933			
380.	Post on Nick Denton's Twitter Account			
	June 12, 2015			
	BOLLEA 006934-006935			
381.	ABCNews – Hulk Hogan Taking Gawker Media to Court Over Sex Tape			
	June 19, 2015			
	BOLLEA 006936-006938			
382.	Money.CNN.com – Hulk Hogan sex tape trial could destroy Gawker			
	June 18, 2015			
	BOLLEA 006939-006945			
383.	BusinessInsider.com – Gawker lawyers don't think the journalist Hulk Hogan pays \$350 an hour is an 'expert'			
	June 19, 2015			
	BOLLEA 006946-006947			

Exhibit	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
No. 384.	FoxNews.com – Hulk Hogan, Gawker			
	prepare to head to trial over sex tape			
	June 19, 2015			
	BOLLEA 006948-006953			
385.	USAToday.com – Wolff: Gawker			
	should pay for free speech			
	June 18, 2015			
	BOLLEA 006954-006956			
386.				
	the privacy of the world's sex tapes			
	June 16, 2015			
	BOLLEA 006957-006963			
387.	AJ Daulerio Twitter Post			
	June 15, 2015			
	BOLLEA 006964-006965			
388.	Adrian Chen Twitter Post			
	June 17, 2015			
	BOLLEA 006966-006967			
389.	Adrian Chen Twitter Post			
	June 17, 2015			
	BOLLEA 006968			

Exhibit No.	Description <sup>T</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
390.	Leah Finnegan Twitter Post			
	June 16, 2015			
	BOLLEA 006969-006970			
391.	Leah Finnegan Twitter Post			
	June 16, 2015			
	BOLLEA 006971			
392.	Leah Finnegan Twitter Post			
	June 16, 2015			
	BOLLEA 006972-006973			
393.	Leah Finnegan Twitter Post			
	June 16, 2015			
	BOLLEA 006974			
394.	Leah Finnegan Twitter Post			
	June 16, 2015			
	BOLLEA 006975-006976			
395.	Max Read Twitter Post			
	June 16, 2015			
	BOLLEA 006977-006980			
396.	Max Read Twitter Post			
	June 12, 2015			
	BOLLEA 006981-006982			

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
397.	Tom Scocca Twitter Post			
	June 17, 2015			
	BOLLEA 006983-006985			
398.	Tom Scocca Twitter Post			
	June 17, 2015			
	BOLLEA 006986			
399.	Tom Scocca Twitter Post			
	June 16, 2015			
	BOLLEA 006987			
400.	Tom Scocca Twitter Post			
	June 16, 2015			
	BOLLEA 006988			
401.	Deposition transcript of Scott Kidder			
	June 16 ,2015			
402.	Deposition transcript of Nick Denton			
	June 16, 2015			
403.	Deposition transcript of A.J. Daulerio			
	June 17, 2015			
404.	Form of Corporate Guaranty			
	GAWKER 28465_C-28471_C			

Exhibit	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
No.				
405.	Documents relating to Gawker Media			
	LLC's ownership of Vox Media, Inc. shares			
	Sitates			
	GAWKER 28758 C-28759 C			
	<del>-</del> -			
406.	1 /			
	Stock Valuation Report			
	April 30, 2014			
	April 30, 2014			
	DENTON 105_C-179_C			
407.	Gawker Media LLC Income Statement			
	2014			
	2014			
	GAWKER 28223_C			
	_			
408.	Gawker Media LLC Income Statement			
	T 2015 A 32015			
	January 2015–April 2015			
	GAWKER 28224 C			
409.	Gawker Media LLC Balance Sheet			
	April 2015			
	GAWKER 28227 C-28228 C			
	GAWKER 28227_C-28228_C			
410.	Promissory Note			
	•			
	January 10, 2015			
	CAWKED 20750 C 20752 C			
	GAWKER 28750_C-28753_C			
411.	Promissory Note			
	•			
	January 10, 2013			
	CAWVED 20742 C 20745 C			
	GAWKER 28742_C-28745_C			
L		L		l

Exhibit	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
No. 412.	Dromingowy Note			
412.	Promissory Note			
	January 10, 2014			
	GAWKER 28746_C-28749_C			
413.	Documents relating to Gawker Media, LLC's ownership of shares in RGFREE, Inc.			
	GAWKER 28756 C-28757 C			
414.	NAME AND ADDRESS OF THE PARTY O			
	February 2, 2015			
	AJD 069_C			
415.	Loan statement			
	June 1, 2015			
	GAWKER 28754_C-28755_C			
416.	Spreadsheet			
	May 1, 2015			
	DENTON 104_C			
417.	Statement for Chase accounts belonging to Gawker Media LLC and check images from same			
	December 1, 2011–December 30, 2011			
	GAWKER 28657_C-28672_C			
		L	L	J

Exhibit	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
No.	_			-
418.	Statement for Chase accounts belonging to Gawker Media LLC and check images from same			
	December 1, 2012–December 30, 2012			
	GAWKER 28680_C-28682_C			
419.	belonging to Gawker Media LLC			
	April 1, 2015–April 30, 2015			
	GAWKER 28738_C-28741_C			
420.	Statement for Silicon Valley Bank account belonging to Gawker Media LLC and check images from same			
	April 2015			
	GAWKER 28720_C-28737_C			
421.	Documents relating to Gawker Media LLC's tax return for 2013			
	GAWKER 28512_C-28575_C			
422.	Documents relating to Gawker Media LLC's tax returns for 2011 and 2012			
	GAWKER 28618_C-28656_C			
423.	Documents relating to Gawker Media LLC's tax returns for 2011 and 2012			
	GAWKER 28576_C-28617_C			
424.	Documents relating to Nicholas Denton's tax return for 2011			
	DENTON 068_C-077_C			

Exhibit	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
No. 425.	W-2 statements relating to Nicholas Denton			
	GAWKER 28505_C-28511_C			
426.	Statement for Chase accounts belonging to Nicholas Denton			
	November 11, 2011–December 12, 2011			
	DENTON 016_C			
427.	Documents relating to Nicholas Denton's tax return for 2012			
	DENTON 078_C-103_C			
428.	Statement for Chase accounts belonging to Nicholas Denton			
	November 14, 2012–December 12, 2012			
	DENTON 017_C			
429.	Documents relating to Nicholas Denton's tax return for 2013			
	DENTON 321_C-347_C			
430.	Documents relating to Nicholas Denton's tax return for 2014			
	DENTON 348_C-377_C			
431.	Statement for J.P. Morgan account belonging to Nicholas Denton			
	November 4, 2013–December 11, 2013			
	DENTON 018_C-028_C			

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
432.	Statement for Voya Financial account belonging to Nicholas Denton			
	January 1, 2015–March 31, 2015			
	DENTON 009_C-015_C			
433.	Daulerio and Nicholas Denton			
	GAWKER 28501_C-28504_C			
434.	Documents relating to Albert Daulerio's tax return for 2012			
	AJD 039_C-045_C			
435.	Various documents relating to Albert Daulerio's tax return for 2013			
	AJD 050_C-055_C			
436.	Statement for Chase accounts belonging to Albert Daulerio			
	November 14, 2013–December 11, 2013			
	AJD 056 C-059 C			
437.				
	AJD 046_C-049_C			
438.	Documents relating to AJ Daulerio's ownership of shares in RGFREE, Inc.			
	AJD 061_C-065_C			

Exhibit	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
No.				
439.	Statement for Chase accounts belonging to Albert Daulerio			
	November 14, 2014—December 10, 2014			
	AJD 060_C			
440.	Statement for Chase accounts belonging to Albert Daulerio			
	April 15, 2015			
	AJD 060_C			
441.	Loan details			
	AJD 070_C			
442.	Any additional documents and testimony obtained through or later deemed relevant as a result of additional financial worth discovery permitted by the Court			

Plaintiff reserves his right to supplement these disclosures to include additional exhibits subsequently deemed relevant as a result of Motion(s) to Compel and/or Motions in Limine currently be litigated.

DATED: June 23, 2015.

/s/ Kenneth G. Turkel

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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 23rd day of June, 2015 to the following:

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