

EXHIBIT A

SUMMARY OF MR. BOLLEA'S POSITION WITH RESPECT TO SPECIFIC MATERIALS IDENTIFIED IN GAWKER'S MOTION TO UNSEAL

BOLLEA1068-1354, DH1-14, 19-21: these are the “negotiations” and “agreements” with the lawyer for the extortionist who was attempting to blackmail Mr. Bollea into paying money to prevent the release of further sex videos. This has been the subject of state and federal investigations, and Mr. Bollea believes the investigations are still ongoing and that these documents constitute evidence of a crime against him. Release of these documents will not serve the public interest and could compromise any future prosecution of the extortionist. Further, they contain purported transcripts of offensive language, which the Court has ruled irrelevant to the case. **KEEP DESIGNATION.**

BOLLEA2654-2667: these are private text messages between Mr. Bollea and Bubba Clem. They were clearly intended as confidential communications, contain discussions of their private lives, and also contain Mr. Clem's private cell phone number. These should remain private. **KEEP DESIGNATION.**

DH1-21: these are the “negotiations” and “agreements” with the lawyer for the extortionist who was attempting to blackmail Mr. Bollea into paying money to prevent the release of further sex videos. This has been the subject of state and federal investigations, and Mr. Bollea believes the investigations are still ongoing and that these documents constitute evidence of a crime against him. Release of these documents will not serve the public interest and could compromise any future prosecution of the extortionist. Further, they contain purported transcripts of offensive language, which the Court has ruled irrelevant to the case. **KEEP DESIGNATION.**

DBA53-54, 326-27: these documents contain a purported transcript of offensive language, which the Court has ruled irrelevant to the case. **KEEP DESIGNATION.**

BOLLEA DEPO. 760:19-770:5: this contains a discussion of offensive language, which the Court has ruled irrelevant to the case. **KEEP DESIGNATION.**

BOLLEA DEPO. 786:23-832:4: this contains detailed testimony about the extortion attempt, release of which could compromise any future prosecution, as well as a discussion of offensive language, which the Court has ruled irrelevant to this case. **KEEP DESIGNATION.**

PEIRCE DEPO. 95:12-105:18: this contains a discussion of offensive language, which the Court has ruled irrelevant to this case. **KEEP DESIGNATION.**

PEIRCE DEPO. 105:19-114:14: confidentiality can be removed as to this portion of the deposition. **REMOVE DESIGNATION.**

BURTON DEPO. 26:17-29:14, 34:21-35-3, 43:5-16, 52:10-54:16, 57:9-61:14: this contains a discussion of offensive language, which the Court has ruled irrelevant to this case. **KEEP DESIGNATION.**

HOUSTON DEPO. 1:1-130:18: confidentiality can be removed as to these portions of the deposition. **REMOVE DESIGNATION.**

HOUSTON DEPO. 130:19-133:18, 163:2-171:3: this contains a discussion of offensive language, which the Court has ruled irrelevant to this case. **KEEP DESIGNATION.**

HOUSTON DEPO. 133:19-163:1, 171:4-227:9: this contains testimony about the extortion attempt, release of which could compromise any future prosecution. It also contains discussion of offensive language, which the Court has ruled irrelevant to this case **KEEP DESIGNATION.**

SUPPLEMENTAL AND SECOND SUPPLEMENTAL RESPONSES TO AJ DAULERIO INTERROGATORY NO. 9: this contains testimony about the extortion attempt, release of which could compromise any future prosecution. **KEEP DESIGNATION.**

AUDIO TRACKS E-3, E-4, AND E-5: these are recordings of telephone conversations related to the extortion attempt, release of which could compromise any future prosecution. **KEEP DESIGNATION.**

AUDIO TRACK ITEM D BUBBA APOLOGY: confidentiality can be removed as to this audio track. **REMOVE DESIGNATION.**

AUDIO TRACK WORKING FINAL TRACK 5: this is a recording of the sting operation related to the extortion attempt which also captures audio of purported sex tapes involving Mr. Bollea and Heather Clem, which are private and should remain private. It also contains discussion of offensive language, which has been ruled irrelevant by the Court. This recording is also potential evidence in any prosecution brought with respect to the sting attempt, and therefore should not be released as it could compromise any prosecution. **KEEP DESIGNATION.**

NOVEMBER 12, 2012 GAWKER ARTICLE: confidentiality can be removed as to this document. **REMOVE DESIGNATION.**

FEBRUARY 23, 2015 EMAIL FROM UNKNOWN USAFLM SENDER: Gawker has failed to describe this document with sufficient particularity so it can be located. **KEEP DESIGNATION.**

EOUSA1-24: these are documents relating to the extortion investigation. Release could compromise a later prosecution. **KEEP DESIGNATION.**

GAWKER1-1178 [FROM FBI PRODUCTION]: these documents concern the FBI's investigation of the extortion attempt, and release could jeopardize a future prosecution. They also contain discussions of offensive language, which the Court has ruled irrelevant. **KEEP DESIGNATION.**