

Exhibit A

to the

**GAWKER DEFENDANTS' OPPOSITION
TO PLAINTIFF'S MOTION FOR ATTORNEYS' FEES
AND COSTS ON DISCOVERY RULINGS**

DISCOVERY REQUESTS:

Plaintiff's Requests for Production to the Gawker Defendants: Plaintiff's First RFP to Gawker (88 requests) (May 21, 2013); Plaintiff's Second RFP to Gawker (18 requests) (Aug. 12, 2013); Plaintiff's Third RFP to Gawker (10 requests) (November 1, 2013); Plaintiff's First Supp. RFP to Gawker (1 request) (Jan. 28, 2014); Plaintiff's Fourth RFP to Gawker (14 requests) (May 23, 2014); Plaintiff's Fifth RFP to Gawker (21 requests) (Dec. 29, 2014); Plaintiff's Sixth RFP to Gawker (26 requests) (March 11, 2015); Plaintiff's RFP re: Net Worth to Gawker (88 requests) (May 1, 2015); Plaintiff's First RFP to Daulerio (84 requests) (Nov. 11, 2013); Plaintiff's Second RFP to Daulerio (1 request) (May 23, 2014); Plaintiff's Third RFP to Daulerio (5 requests) (Dec. 15, 2014); Plaintiff's RFP re: Net Worth to Daulerio (80 requests) (May 1, 2015); Plaintiff's First RFP to Denton (4 requests) (June 16, 2014); Plaintiff's RFP re: Net Worth to Denton (92 requests) (May 1, 2015); Plaintiff's First RFP to GMGI (32 requests) (Nov. 7, 2013); Plaintiff's First RFP to Kinja (116 requests) (May 1, 2014).

Plaintiff's Interrogatories to the Gawker Defendants: Plaintiff's First Set of Interrogs. to Gawker (10 interrogatories) (May 21, 2013); Plaintiff's Second Set of Interrogs. to Gawker (4 interrogatories) (June 27, 2013); Plaintiff's Third Set of Interrogs. to Gawker (13 interrogatories) (May 23, 2014); Plaintiff's Fourth Set of Interrogs. to Gawker (8 interrogatories) (Dec. 29, 2014); Plaintiff's First Set of Interrogs. to Daulerio (5 interrogatories) (Nov. 1, 2013); Plaintiff's Second Set of Interrogs. to Daulerio (1 interrogatory) (May 23, 2014); Plaintiff's First Set of Interrogs. to Denton (8 interrogatories) (June 16, 2014); Plaintiff's First Set of Interrogs. to Kinja (22 interrogatories) (May 1, 2014); Plaintiff's First Set of Interrogs. to GMGI (12 interrogatories) (Nov. 7, 2013); Plaintiff's First Set of Net Worth Interrogs. to Gawker (21 interrogatories) (May 1, 2015); Plaintiff's First Set of Net Worth Interrogs. to Daulerio (27 interrogatories) (May 1, 2015); Plaintiff's First Set of Net Worth Interrogs. to Denton, (21 interrogatories) (May 1, 2015).

Plaintiff's Requests for Admission to the Gawker Defendants: Plaintiff's First RFAs to Gawker (22 requests) (May 21, 2013); Plaintiff's Second RFAs to Gawker (2 requests) (Nov. 1, 2013); Plaintiff's Third First RFAs to Gawker (5 requests) (March 11, 2015); Plaintiff's First RFAs to Daulerio (14 requests) (Nov. 1, 2013); Plaintiff's First RFAs to Denton (20 requests) (June 16, 2014).

Gawker Defendants' Requests for Production to Plaintiff: Gawker's First RFP to Plaintiff (50 requests) (June 17, 2013); Gawker's Second RFP to Plaintiff (4 requests) (Dec. 19, 2013); Gawker's Third RFP to Plaintiff (1 request) (January 24, 2014); Gawker's Fourth RFP to Plaintiff (9 requests) (Aug. 21, 2014); Gawker's Fifth RFP to Plaintiff (9 requests) (Dec. 18, 2014); Gawker's Sixth RFP to Plaintiff (7 requests) (March 5, 2015).

Gawker Defendants' Interrogatories to Plaintiff: Gawker's First Set of Interrogs. to Plaintiff (20 interrogatories) (June 17, 2013); Daulerio's First Set of Interrogs. to Plaintiff (8 interrogatories) (June 17, 2013); Daulerio's Second Set of Interrogs. to Plaintiff (2 interrogatories) (Dec. 19, 2013); Denton's First Set of Interrogs. to Plaintiff (16 interrogatories) (Aug. 21, 2014); Denton's Second Set of Interrogs. to Plaintiff (1 interrogatory) (Oct. 7, 2014); Denton's Third Set of Interrogs. to Plaintiff (9 interrogatories) (Dec. 18, 2014).

Gawker Defendants' Requests for Admission to Plaintiff: Gawker's First RFAs to Plaintiff (21 requests) (March 5, 2015); Gawker's Second RFAs to Plaintiff (4 requests) (March 11, 2015).