

**IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA**

TERRY GENE BOLLEA professionally
known as HULK HOGAN,

Case No. 12012447 CI-011

Plaintiff,

vs.

GAWKER MEDIA, LLC
aka GAWKER MEDIA; NICK DENTON; A.J.
DAULERIO,

Defendants.

_____ /

**PLAINTIFF TERRY GENE BOLLEA'S
FOURTH SUPPLEMENTAL EXHIBIT LIST**

Plaintiff, Terry Gene Bollea, professionally known as Hulk Hogan, by counsel and pursuant to paragraph six of the Court's Second Order Setting Jury Trial and Pretrial Conference, dated November 19, 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 – Gawker, 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>			

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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>			

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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.	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			
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			

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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			
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 BOLLEA 004242-004245			
36.	Watchdog.org – The Gawkerization of the media December 13, 2013 BOLLEA 004253-004256			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
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.	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			
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			

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

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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.	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			
73.	Gawker.com – Ladies: 8,000 Creeps on Reddit Are Sharing the Nude Photos You Posted to Photobucket August 8, 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, Gayheart v. Gawker Media, LLC et al.</i> September 23, 2009 BOLLEA 005334-005340			

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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			
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			

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

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

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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			

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112.	<p>Emails between Tony Burton and A.J. Daulerio</p> <p>September 27, 2012</p> <p>DBA 0348-0349</p>			
113.	<p>Emails between Tony Burton and A.J. Daulerio</p> <p>September 27, 2012</p> <p>DBA 0350-0352</p>			
114.	<p>Emails sent to tips@gawker.com</p> <p>Various dates</p> <p>GAWKER 00061-00069</p>			
115.	<p>HollywoodReporter.com – Gawker’s Nick Denton Explains Why Invasion of Privacy Is Positive for Society</p> <p>May 22, 2013</p> <p>Subsequently produced as BOLLEA 000706-000708</p>			
116.	<p>Internal Gawker email correspondence</p> <p>October 4, 2012</p> <p>GAWKER 00114-0015</p>			
117.	<p>Internal Gawker email correspondence</p> <p>October 4, 2012</p> <p>GAWKER 00125</p>			

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			

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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			

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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			

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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			
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			

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.	Raw data provided in support of Expert Report of Prof. Leslie John			
237.	<p>Expert Report of Prof. Leslie John</p> <p>May 20, 2015</p>			
238.	Google Trends data prepared by Shanti Shunn in support of report on video counters.			
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.	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.	Gawker.com - Tech Bro's Google-Sponsored Trip to India Turns Into Naked Beach Romp [UPDATE] February 18, 2013 BOLLEA 003278-003288			
257.	Defamer.Gawker.com - Teen Rocker Snapchats His Boner, Girl Uploads It For the World to See 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 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 be 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.			
366.	Nick Denton (Nick.Kinja.com) – The Price of Free Journalism June 12, 2015 BOLLEA 006868–006874			
367.	CapitalNewYork.com – Gawker in the fight of its life with Hulk Hogan sex-tape suit June 12, 2015 BOLLEA 006875–006881			

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

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

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

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
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 ¹	Date Identified	Date Admitted	Objections ²
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 No.	Description ¹	Date Identified	Date Admitted	Objections ²
405.	Documents relating to Gawker Media LLC's ownership of Vox Media, Inc. shares GAWKER 28758_C–28759_C			
406.	Gawker Media Group, Inc. Common Stock Valuation Report April 30, 2014 DENTON 105_C–179_C			
407.	Gawker Media LLC Income Statement 2014 GAWKER 28223_C			
408.	Gawker Media LLC Income Statement January 2015–April 2015 GAWKER 28224_C			
409.	Gawker Media LLC Balance Sheet April 2015 GAWKER 28227_C–28228_C			
410.	Promissory Note January 10, 2015 GAWKER 28750_C–28753_C			
411.	Promissory Note January 10, 2013 GAWKER 28742_C–28745_C			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
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.	RGFREE “Cap Table” 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			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
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.	Statement for Chase accounts 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 No.	Description ¹	Date Identified	Date Admitted	Objections ²
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 ¹	Date Identified	Date Admitted	Objections ²
432.	Statement for Voya Financial account belonging to Nicholas Denton January 1, 2015–March 31, 2015 DENTON 009_C–015_C			
433.	W-2 statements relating to Albert 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.	Documents relating to Albert Daulerio’s tax return for 2014 AJD 046_C–049_C			
438.	Documents relating to AJ Daulerio’s ownership of shares in RGFREE, Inc. AJD 061_C–065_C			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
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 066_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			
443.	Email from Jules Wortman to Terry Bollea October 5, 2012 TNA-G0018–G0023			
444.	Digiday.com – Nick Denton’s Beef with BuzzFeed July 25, 2013 Subsequently produced as BOLLEA 000693–000698			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
445.	Post on Nick Denton's Twitter account June 26, 2015 BOLLEA 006989–006990			
446.	Youtube.com – Hulk Hogan sex tape: \$100m lawsuit against celebrity gossip news site Gawker – TomoNews June 22, 2015 BOLLEA 006991–006992			
447.	Video found at Exhibit 446 June 22, 2015 BOLLEA 006993			
448.	Post on Nick Denton's Twitter account October 10, 2012 BOLLEA 006994			
449.	Chart found at yfrog.com/h4r94vp BOLLEA 006995			
450.	Post on Nick Denton's Twitter account June 30, 2015 BOLLEA 006996–006997			
451.	Buzzfeed.com – Sex-Tape Broker Says Hulk Hogan's Sex Video Is Worth Nothing June 30, 2015 BOLLEA 006998–007001			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
452.	Buzzfeed.com – Gawker’s Nick Denton Once Had Risqué Photos Stolen – And says They’re Fair Game for Publication June 30, 2015			
453.	Email from Douglas DeMay to Thomas Plunkett and Jesse Ma November 7, 2012 GAWKER 00815–00846			
454.	Confidential Deposition transcript of A.J. Daulerio June 17, 2015			
455.	Confidential Deposition transcript of Nick Denton June 16, 2015			
456.	Confidential Deposition transcript of Scott Kidder June 16, 2015			
457.	Newsweek.com – “We Need Some Limits”: A Very Brief Q&A With Gawker Founder Nick Denton July 23, 2015			
458.	NYTimes.com – Two Editors Resign Over Article’s Removal July 20, 2015			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
459.	HuffingtonPost.com – Anyone Else Think James Franco Should Sue the Hell Out of Gawker July 17, 2015			
460.	Deadspin.com – Bills Fans Hump Between Cars December 16, 2015			
461.	Gawker.com – BuzzFeed Consolidated Financial Statements August 12, 2015			
462.	CNN.com – Founder of Gawker Media Nick Denton: “...in this particular instance, the judgment call was wrong, and I had it reversed.” July 26, 2015			
463.	NYPost.com – Gawker dodges potentially deadly Hulk Hogan lawsuit—for now July 2, 2015			
464.	Fortune.com – Gawker’s lawyer is proud of Hulk Hogan fight, regrets outing exec August 4, 2015			
465.	Recode.net – Gawker Media Ads Boss Andrew Gorenstein Is Out October 19, 2015			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
466.	WSJ.com – Gawker Reels Amid Identity Crisis July 21, 2015			
467.	NYTimes.com – Gawker to Retool as Politics Site November 17, 2015			
468.	NYTimes.com – Gawker’s Future: A Conversation with Nick Denton July 27, 2015			
469.	Fortune.com – Gawker gives media world a model of crude coverage July 16, 2015			
470.	Digiday.com – Gawker’s real business problem: It’s too small for the modern media economy July 23, 2015			
471.	Fortune.com – Meet the young, fearless lawyer behind Gawker August 18, 2015			
472.	TheHollywoodReporter.com – Gawker Editor-in-Chief Resigns After Controversial Post Gets Take Down July 20, 2015			
473.	JimRomenesko.com – Nick Denton warns Gawker Media staff about upcoming negative New York Post story July 2, 2015			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
474.	CapitalNewYork.com – As Gawker traffic stalls, writers told to work faster October 9, 2015			
475.	NYTimes.com – A Blog Revolution? Get a Grip May 8, 2005			
476.	IBTimes.com – Civil War At Gawker Media: Nick Denton Has ‘No Chance’ Of Winning Back Trust July 20, 2015			
477.	TheIntercept.com – Max Read’s Moralizing Justification for Gawker’s Vile Article July 17, 2015			
478.	NYTimes.com – John Cook’s Memo to Gawker’s Staff November 17, 2015			
479.	NYTimes.com – Limits at Gawker? Rules at Reddit? Wild West Web Turns a Page July 21, 2015			
480.	NYTimes.com – Nick Denton’s Memo to Gawker’s Staff November 17, 2015			
481.	NYTimes.com – 2 Editors Resign Over Article’s Removal July 20, 2015			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
482.	Post on Peter Sterne's Twitter account July 21, 2015			
483.	CapitalNewYork.com – Gawker president: 'More likely than not' we'll lose Hogan case October 27, 2015			
484.	TheSun.co.uk – Porn baron who made Kim a star September 28, 2015			
485.	Deadspin.com – Soccer Player Cut From Team After Being Filmed Boning Fan In The Dugout [Update: Now With Video] April 20, 2015			
486.	CapitalNewYork.com – The 'Gawker tax' is getting too high, Denton tells his staff July 22, 2015			
487.	AboveTheLaw.com – The Most Interesting In-House Job In The World? July 1, 2015			
488.	BusinessInsider.com – Bleacher Report has EYE-POPPING Revenues—No Wonder Turn Is About To Snatch It Up June 27, 2012			
489.	Capital IQ – Bleacher Report, Inc. December 1, 2015			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
490.	AwfulAnnouncing.com – Understanding Turner’s Acquisition of Bleacher Report August 8, 2012			
491.	Axel Springer – Axel Springer acquired Business Insider September 29, 2015			
492.	NYTimes.com – Axel Springer Pays Very Generous Price for Business Insider September 29, 2015			
493.	Capital IQ – Axel Springer SE M&A Call September 29, 2015			
494.	Capital IQ – Business Insider, Inc. December 1, 2015			
495.	Adage.com – Here’s Business Insider’s Crazy New Strategy to Boost Ad Revenue October 10, 2012			
496.	Recode.net – Investors Think Business Insider Doubled Its Value in Less Than a Year January 29, 2015			
497.	FT.com – Lunch with the FT: Henry Blodget November 15, 2013			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
498.	Buzzfeed, Inc. & Subsidiaries Consolidated Financial Statements Various dates			
499.	Capital IQ – BuzzFeed, Inc. December 1, 2015			
500.	Forbes.com – Here’s How BuzzFeed and HuffPost Really Stack Up August 21, 2014			
501.	Recode.net – NBCUniversal Poised to Make Big Investments in BuzzFeed and Vox Media July 30, 2015			
502.	Capital IQ – Flipboard, Inc. December 1, 2015			
503.	TechCrunch.com – Confirmed: Flipboard Raises Another \$50 Million To Close Out Its Series C Round December 9, 2013			
504.	WSJ.com – AOL Buys Huffington Post: Is It Crazy? February 7, 2011			
505.	Capital IQ – TheHuffingtonPost.com, Inc. December 1, 2015			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
506.	WSJ.com – Is Huffington Post Worth \$1 Billion? June 12, 2015			
507.	TechCrunch.com – The Huffington Post Raises \$25 Million from Oak Investment Partners December 1, 2008			
508.	Capital IQ – Mashable, Inc. December 1, 2015			
509.	Capital IQ – Medium December 1, 2015			
510.	Untitled document relating to Medium			
511.	Recode.Net – Ev Williams’s Medium Raises \$57 Million for the ‘Best Stories and Ideas on the Internet’ September 28, 2015			
512.	Capital IQ – Purch, Inc. December 1, 2015			
513.	WSJ.com – Digital-Media Firm Purch Raises Funds June 2, 2015			
514.	Capital IQ – Refinery29, Inc. December 1, 2015			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
515.	Fortune.com – Exclusive: Refinery29 is raising up to \$50 million March 3, 2015			
516.	Recode.net – Refinery29 Joins the Big Media Startup Club, With a \$50 Million Funding Round April 27, 2015			
517.	Inc.com – The Way I Work: Philippe von Borries, Refinery29 October 2013			
518.	CrainsNewYork.com – 2014 Fast 50: No. 23 Thrillist Media Group October 2014			
519.	Forbes.com – America’s Most Promising Companies: #35 Thrillist Date unknown			
520.	Capital IQ – Thrillist Media Group, Inc. December 1, 2015			
521.	BusinessInsider.com – This Startup’s Revenue Exploded From ~ \$10 To ~ \$30 Million Last Year February 8, 2012			
522.	Recode.net – Thrillist and JackThreads Raise \$54 Million, Split Into Separate Companies September 30, 2015			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
523.	Gigaom.com – Thrillist Media Group raises \$13M in first funding round August 16, 2012			
524.	NYTimes.com – As Vice Moves More to TV, It Tries to Keep Brash Voice May 3, 2015			
525.	Capital IQ – Vice Media, Inc. December 1, 2015			
526.	Forbes.com – Thanks To Rupert Murdoch, Vice Is Worth \$1.4 Billion. Could It Be In Play Soon? August 19, 2013			
527.	WSJ.com – Vice Media Rides Lofty Expectations November 2, 2015			
528.	WSJ.com – Vice Raises \$500 Million to Become Media Powerhouse on Every Screen September 4, 2014			
529.	Capital IQ – Vox Media, Inc. December 1, 2015			
530.	Recode.net – NBCUniversal Buys Big Chunks of Vox Media and BuzzFeed August 12, 2015			
531.	NYTimes.com – NBC Universal Invests \$200 Million in Vox Media August 12, 2015			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
532.	WSJ.com – Vox Media to Acquire Technology Website Re/code May 26, 2015			
533.	WashingtonPost.com – Vox Media ventures into general news and news analysis with Vox.com April 7, 2014			
534.	Fortune.com – Vox Media becomes a startup “unicorn” with NBCU funding August 12, 2015			
535.	Business Valuation Resources, LLC – Economic Outlook Update Quarterly, 3Q 2015 Exact date unknown			
536.	Pepperdine University Graziadio School of Business Management – 2015 Capital Markets Report Exact date unknown			
537.	Barenholtz & Company – Individual Condominium Unit Appraisal Report December 7, 2015			
538.	Excerpt from Duff & Phelps Valuation Handbook			
539.	William Blair – Internet & Digital Media Insights: January 2015 Industry Update Exact date unknown			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
540.	PWC – IAB Internet Advertising Revenue Report October 2014			
541.	PWC – IAB Internet Advertising Revenue Report October 2015			
542.	Adage.com – Reality Check: Sizing Up VC-Backed Publishers’ Prospects February 10, 2015			
543.	Time Warner Cable Annual Report 2012			
544.	Untitled document October 4—11, 2012 AJD 007_C			
545.	Email conversation between A.J. Daulerio and Kari Tervo October 12, 2012 AJD 008_C—AJD 012_C			
546.	Email conversation between A.J. Daulerio and Kari Tervo January 6, 2013 AJD 019_C—AJD 020_C			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
547.	JP Morgan Chase Bank, N.A. Annual Tax and Interest Statement December 31, 2014 DENTON 007_C			
548.	Valuation Appraisal for 76 Crosby St. DENTON 029_C— DENTON 067_C October 17, 2013			
549.	Fidelity Investments Investment Report May 1—31, 2015 DENTON 395_C— DENTON 399_C			
550.	Fidelity Investments Investment Report January 1—December 31, 2014 DENTON 401_C— DENTON 406_C			
551.	Fidelity Investments Investment Report January 1—December 31, 2013 DENTON 407_C— DENTON 413_C			
552.	Fidelity Investments Investment Report January 1—December 31, 2012 DENTON 415_C— DENTON 423_C			
553.	Fidelity Investments Investment Report November 1—31, 2012 DENTON 425_C— DENTON 433_C			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
554.	Citibank – Summary of Citigold Account December 15, 2013—January 14, 2014 DENTON 435_C— DENTON 439_C			
555.	Citibank – Relationship Report December 12, 2014 DENTON 440_C—DENTON 446_C			
556.	Untitled text messages Date unknown DENTON 447_C			
557.	Gawker.com Revenue by Month January 2010—June 2013 GAWKER 01147_C			
558.	Documents relating to Gawker Media LLC's tax returns for 2011 and 2012 GAWKER 28616_C—28656_C			
559.	Amended and Restated Memorandum and Articles of Association for Gawker Media Group, Inc. December 2013 GAWKER 28846_C—28887_C			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
560.	Third Amendment to Loan Security Agreement May 15, 2015 GAWKER 28888_C—28905_C			
561.	Second Amended and Restated License Agreement January 1, 2011 GAWKER 28910_C—28921_C			
562.	Internal Corporate Gawker Media Group, Inc. Documents Various dates GAWKER 28950_C—28958_C			
563.	The Gawker Media Group Date unknown GAWKER 28959_C—29006_C			
564.	Gawker Media Group, Inc. and Subsidiaries Consolidated Financial Statements for the Year Ended December 31, 2013 September 29, 2014 GAWKER 29007_C—29023_C			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
565.	Gawker Media Group, Inc. and Subsidiaries Consolidated Financial Statements for the Year Ended December 31, 2014 June 30, 2015 GAWKER 29024_C—29040_C			
566.	Affidavit of Nick Denton July 30, 2015			
567.	Affidavit of Nick Denton October 9, 2015			
568.	Affidavit of Scott Kidder July 30, 2015			
569.	Affidavit of James Donohue December 1, 2015			
570.	Expert Report of James J. Donohue December 11, 2015			
571.	Appendix to Expert Report of James J. Donohue December 11, 2015			
572.	Deadspin.com – Sometimes This World Is A Horrible Place To Live July 18, 2009			
573.	Medium.com – On Gawker’s Problem With Women November 16, 2015			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
574.	Incorporation documents for Gawker Media Limited May 31, 2013			
575.	Form AP01 (Appointment of Director) – Eva Denton October 10, 2013			
576.	Resolution to Amend Articles of Association for Gawker Media Limited October 9, 2013			
577.	Form TM01 (Termination of Appointment of Director) – John Duncan October 9, 2013			
578.	Form CC04 (Statement of Company's Objects) November 1, 2013			
579.	Form AP01 (Appointment of Director) – Adrian Weinbrecht October 9, 2013			
580.	Annual Return for Gawker Media Limited May 31, 2014			
581.	Form RP04 (Second Filing of a Document Previously Delivered) – Annual Return for Gawker Media Limited June 26, 2014			

Exhibit No.	Description ¹	Date Identified	Date Admitted	Objections ²
582.	Gawker Media Limited Abbreviated Accounts for the Year Ended 31/05/2014 February 25, 2015			
583.	Annual Return for Gawker Media Limited May 31, 2015			
584.	All documents obtained through subpoenas issued in the United Kingdom			
585.	Vice.com – Sex Tapes and the First Amendment July 10, 2015			
586.	“Gawker Vs. Hulk Hogan” audio file from Vice.com – Sex Tapes and the First Amendment July 10, 2015			

SUPPLEMENTAL EXHIBITS

587.	Gizmodo.com – 7 Rules for Recording Police April 10, 2012			
588.	Gawker.com – Secret Recording of Mitt Romney Fundraiser May Have Broken Florida Law September 18, 2012			

589.	Tampa PD General Offense Hardcopy November 13, 2015 (Printed on) (For rebuttal purposes only, pending court rulings)			
590.	Sworn Statement of Lori Ann Burbridge February 3, 2015 (For rebuttal purposes only, pending court rulings)			
591.	FBI Form FD302 [FBI Document] GAWKER-447 February 28, 2013 (For rebuttal purposes only, pending court rulings)			

Plaintiff reserves his right to supplement these disclosures to include additional exhibits subsequently deemed relevant as a result of any Motion(s) to Compel and/or Motion(s) in Limine currently being litigated or filed between now and the trial date.

Plaintiff further reserves his right to supplement these disclosures to include additional exhibits subsequently deemed relevant as a result of the continuing expert witness testimony concerning the financial worth of defendants Gawker Media, LLC, Nick Denton, and A.J. Daulerio, including without limitation the transcript of and any exhibits to the deposition of James Donohue and of any rebuttal expert witness provided by the above named defendants.

Plaintiff further reserves his right to supplement these disclosures to include additional exhibits subsequently deemed relevant as a result of the continuing discovery into the possession

and/or ownership of Gawker Media Group Inc. shares by relatives or persons associated with defendant Nick Denton residing in the United Kingdom.

Plaintiff further reserves the right to supplement these disclosures with additional exhibits deemed relevant as a result of continuing discovery regarding defendants' net worth, including documents and materials related to the recently reported investment in Gawker Media Group, Inc.

DATED: January 28, 2016.

/s/ Kenneth G. Turkel

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Counsel for Plaintiff

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 28th day of January, 2016 to the following:

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/s/ Kenneth G. Turkel

Attorney