

**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**  
**FINAL 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 FINAL list of exhibits for trial:

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			

---

<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>
3.	<p>Gawker.com articles:</p> <ol style="list-style-type: none"> <li>1. Many People Asked This Hulk Hogan Cosplayer About His Sex Tape This Weekend (October 15, 2012)</li> <li>2. Some Additional Notes About the Hulk Hogan Sex Tape We Should All Take Into Consideration As Things Fall Apart (October 5, 2012)</li> </ol> <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>			

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
7.	<p>Gawker.com – These Topless Photos of Kate Middleton Put Us as Two for Three on Royal Nudie Pic Scandals [NSFW] (Update)</p> <p>September 14, 2012</p> <p>Subsequently produced as BOLLEA 000678-000681</p>			
8.	<p>GQ.com – The Worldwide Leader in Dong Shots</p> <p>February 2011</p> <p>Subsequently produced as BOLLEA 000682-000686</p>			
9.	<p>NYMag.com – Nick Denton Using His Own Love Life to Plug Hulk Hogan Sex Tape</p> <p>October 8, 2012</p> <p>Subsequently produced as BOLLEA 000687-000688</p>			
10.	<p>TheGuardian.com – Gawk, don't talk</p> <p>December 1, 2006</p> <p>Subsequently produced as BOLLEA 000699-000703</p>			
11.	<p>Gawker.com – Fred Durst: Touch My Balls And Ass And Then Sue Gawker</p> <p>Subsequently produced as BOLLEA 000704-000705</p>			

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

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

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
23.	<p>Gawker.com articles</p> <ol style="list-style-type: none"> <li>1. ISIS Beheads American Journalist James Foley in Video Message to U.S. (August 19, 2014)</li> <li>2. Algerian Fighters Linked to ISIS Behead French Hostage in Video (September 24, 2014)</li> <li>3. ISIS Beheads Japanese Hostage Kinji Goto in New Video (January 31, 2015)</li> <li>4. ISIS Claims to Have Beheaded Third American Hostage in New Video (November 16, 2014)</li> <li>5. ISIS Reportedly Burns Captured Jordanian Pilot Alive (February 3, 2015)</li> </ol> <p>BOLLEA 002942-002981, 004798-004824</p>			
24.	<p>Gawker.com articles:</p> <ol style="list-style-type: none"> <li>1. Some Horrible Sociopath Hung a Used Condom From a F Train Handrail (October 10, 2014)</li> <li>2. Three Weeks Later, the F Train Condom Is Still Fucking Hanging There (October 14, 2014)</li> </ol> <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>			

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
26.	<p>Gawker.com – What happened to the stock option program?</p> <p>August 26, 2014</p> <p>BOLLEA 003627-003636</p>			
27.	<p>Archive.org – Bathroom Sex Pandemic Reaches The Damp Floor of Indiana Sports Bar (UPDATE)</p> <p>BOLLEA 003725</p>			
28.	<p>Deadspin.com – Cocaine, Suicide, Women, and Guns: An A.J. Daulerio Story</p> <p>January 4, 2012</p> <p>BOLLEA 003737-003746</p>			
29.	<p>Gizmodo.com – This is Apple’s Next iPhone</p> <p>April 19, 2010</p> <p>BOLLEA 003898-003925</p>			
30.	<p>PlayboySFW.Kinja.com – The Playboy Interview: A Candid Conversation with Gawker’s Nick Denton</p> <p>February 21, 2014</p> <p>BOLLEA 004089-004107</p>			
31.	<p>The Daily Beast – The Gospel According to Nick Denton—What Next For The Gawker Founder?</p> <p>December 14, 2014</p> <p>BOLLEA 004113-004120</p>			



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

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
43.	<p>NPR.org – Gawker Wants To Offer More Than Snark, Gossip</p> <p>January 3, 2011</p> <p>BOLLEA 004433-004436</p>			
44.	<p>CNET.com – How Gizmodo escaped indictment in iPhone prototype deal</p> <p>October 12, 2011</p> <p>BOLLEA 004454-004461</p>			
45.	<p>TheAwl.com – Inside Gawker Media’s First Company-Wife Meeting</p> <p>September 8, 2011</p> <p>BOLLEA 004470-004477</p>			
46.	<p>YouTube.com – John Cook (Former Editor-in-Chief at Gawker) on “Ethics in Journalism #GamerGate</p> <p>Uploaded: November 8, 2014 Originally aired: April 4, 2014</p> <p>BOLLEA 004502-004503</p>			
47.	<p>Video found at YouTube.com – John Cook (Former Editor-in-Chief at Gawker) on “Ethics in Journalism #GamerGate</p> <p>BOLLEA 004504</p>			

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
48.	<p>DailyFinance.com – Muzzled Reporter Says ‘Maw of Yahoo’ No Place for Journalism</p> <p>September 22, 2010</p> <p>BOLLEA 004525-004527</p>			
49.	<p>Email from David Houston to nick@gawker.com</p> <p>October 5, 2012</p> <p>BOLLEA 00453</p>			
50.	<p>Gawker.com - That Type of Girl Deserves It</p> <p>September 27, 2014</p> <p>BOLLEA 004565-004567</p>			
51.	<p>TheNextWeb.com – The internal memo sent to Gawker staff after the attack</p> <p>December 18, 2010</p> <p>BOLLEA 004573-004577</p>			
52.	<p>Multiple Gawker Media memorandums published at JimRomenesko.com</p> <p>Various dates</p> <p>BOLLEA 004672-004731, 005364-005373</p>			
53.	<p>Non-party websites exhibiting the Gawker produced sex video.</p> <p>BOLLEA 004624-004645</p>			

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
54.	BusinessInsider.com – Someone Is Willing To Pay A WHOLE Lot Of Money To Get Kim Kardashian’s Sex Tape Off The Market  August 31, 2011  BOLLEA 004659-004660			
55.	AVN.com – Alleged Gene Simmons Sex Video Released  February 19, 2008  BOLLEA 004661-004662			
56.	Preservations of Vivid.com and ShopVivid.com  BOLLEA 004666-004671			
57.	Multiple Whois Records for Gawker.com  Various dates  BOLLEA 004776-004783			
58.	Whois Records for Gawker Media websites  September 12, 2014  BOLLEA 004784-004797			
59.	BusinessInsider.com – Why Gawker Media is Kicking Everyone’s Ass  April 8, 2010  BOLLEA 004828-004832			

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

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
66.	<p>Gawker.com – All Your McSteamy Dreams Come True</p> <p>August 18, 2009</p> <p>BOLLEA 005183-005184</p>			
67.	<p>Gawker.com – Internet’s Sleaziest Pornographer Calls It Quits: ‘I’m Done with Looking at Little Kids Naked All Day’</p> <p>April 19, 2012</p> <p>BOLLEA 005185-005189</p>			
68.	<p>Gawker.com – Unmasking Reddit’s Violentacrez, The Biggest Troll on the Web</p> <p>October 12, 2012</p> <p>BOLLEA 005190-005204</p>			
69.	<p>Gawker.com – The Case of Making Revenge Porn a Federal Crime</p> <p>March 27, 2014</p> <p>BOLLEA 005205-005210</p>			
70.	<p>Jezebel.com – Tumblr Refuses to Take Down Illegal Public Restroom Photos</p> <p>July 16, 2014</p> <p>BOLLEA 005211-005215</p>			

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
71.	<p>Gawker.com – One Woman’s Crusade Against Revenge Porn</p> <p>May 1, 2013</p> <p>BOLLEA 005216-005223</p>			
72.	<p>Gawker.com – A Judge Told Us to Take Down Our Hulk Hogan Sex Tape Post. We Won’t.</p> <p>April 25, 2013</p> <p>BOLLEA 005224-005231</p>			
73.	<p>Gawker.com – Ladies: 8,000 Creeps on Reddit Are Sharing the Nude Photos You Posted to Photobucket</p> <p>August 8, 2012</p> <p>BOLLEA 005244-005257</p>			
74.	<p>Gawker.com – Pervy Flesh-Peddler Bill O’Reilly Plays Erin Andrews Peephole Video On-Air</p> <p>July 23, 2009</p> <p>BOLLEA 005258-005263</p>			
75.	<p>Complaint for Copyright Infringement and Demand for Jury Trial in <i>Dane, Gayheart v. Gawker Media, LLC et al.</i></p> <p>September 23, 2009</p> <p>BOLLEA 005334-005340</p>			



Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
76.	<p>TheGate – The New News: Ethics’ Place in the Digital World</p> <p>February 16, 2015</p> <p>BOLLEA 005344-005347</p>			
77.	<p>Post on Nick Denton’s Twitter account</p> <p>September 23, 2009</p> <p>BOLLEA 005348</p>			
78.	<p>NYDailyNews – Rebecca Gayheart and husband Eric Dane win settlement over sex tape posted on Gawker</p> <p>August 4, 2010</p> <p>BOLLEA 005349-005350</p>			
79.	<p>Society of Professional Journalists Code of Ethics</p> <p>BOLLEA 005558</p>			
80.	<p>Business Insider – AOL Hopes To Turn A Profits On Huffington Post Next Year</p> <p>December 23, 2013</p> <p>Subsequently produced as BOLLEA 005589-005592</p>			
81.	<p>TheAwl.com – Gawker Media Moves To Uniques: Be “Even More of a Hustler” Says Nick Denton</p> <p>January 5, 2010</p> <p>Subsequently produced as BOLLEA 005610-005638</p>			

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

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
89.	CogentValuation.com – The Pricing of Online Media  Subsequently produced as BOLLEA 006172-006178			
90.	SeekingAlpha.com – Valuation Metrics Of Large vs. Small Website Acquisitions  August 27, 2008  Subsequently produced as BOLLEA 006179-006180			
91.	TheVerge.com – YouTube view counts stop at 301 to prevent ‘counterfeit’ views  June 26, 2012  BOLLEA 006381-006382			
92.	ROI Factor Blog – How Does YouTube Count Views?  August 2010  BOLLEA 006383-006392			
93.	9to5Google – Google announces changes to YouTube view count validation  February 4, 2014  BOLLEA 006393-006395			

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

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
98.	Playboy magazine March, 2014 BOLLEA 006403 Plaintiff previously provided a copy of this exhibit to Defendants and will not be providing any additional copies with this list.			
99.	Wired magazine May, 2013 BOLLEA 006404 Plaintiff previously provided a copy of this exhibit to Defendants and will not be providing any additional copies with this list.			
100.	SearchEngineWatch.com – New York Times to Sell About.com: Google to Blame? August 16, 2012 BOLLEA 006443-006445			
101.	Form 10-K – XO Group Inc. BOLLEA 006446-006537			
102.	Form 10-K – Everyday Health, Inc. BOLLEA 006538-006677			
103.	Form 10-K – TheStreet, Inc. BOLLEA 006678-006834			

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
104.	S&P Capital IQ – Bleacher Report, Inc.  BOLLEA 006835-006836			
105.	S&P Capital IQ – BuzzFeed, Inc.  BOLLEA 006837-006838			
106.	S&P Capital IQ – Grandparents.com, Inc.  BOLLEA 006839-006840			
107.	S&P Capital IQ – Yelp Inc.  BOLLEA 006841-006843			
108.	ComScore.com – comScore Ranks the Top 50 U.S. Digital Media Properties for September 2014  October 22, 2014  BOLLEA 006844-006849			
109.	Presentation prepared by The Street  BOLLEA 006850-006867			
110.	Email from Charles Harder to Stephen Diaco and Todd Alan Clem aka Bubba The Love Sponge Clem  October 16, 2012  BOLLEA 000732-35			
111.	Email from Tony Burton to A.J. Daulerio  September 27, 2012  DBA 0058			

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

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



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

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

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

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

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

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

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



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

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

Exhibit No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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.	<p>Nick Denton (Nick.Kinja.com) – The Price of Free Journalism</p> <p>June 12, 2015</p> <p>BOLLEA 006868–006874</p>			
367.	<p>CapitalNewYork.com – Gawker in the fight of its life with Hulk Hogan sex-tape suit</p> <p>June 12, 2015</p> <p>BOLLEA 006875–006881</p>			

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.	<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 <sup>1</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 No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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.	Fusion.net – Hulk Hogan is fighting for 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>1</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 No.	Description <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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.	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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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 <sup>1</sup>	Date Identified	Date Admitted	Objections <sup>2</sup>
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			
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)			

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

**SUPPLEMENTAL EXHIBITS**

592.	Video – Video found at Plaintiff’s Exhibit 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			
593.	Video – Video found at Plaintiff’s Exhibit 460 [Deadspin.com – Bills Fans Hump Between Cars]  December 16, 2015			
594.	Video – Video found at Plaintiff’s Exhibit 485 [Deadspin.com – Soccer Player Cut From Team After Being Filmed Boning Fan In The Dugout [Update: Now With Video]]  April 20, 2015			

595.	<p>Recode.net – Nick Denton Says Facebook Is the Boss, and Gawker Will Fall in Line</p> <p>January 28, 2016</p>			
596.	<p>Audio – Audio interview found at Plaintiff’s Exhibit 595.</p>			
597.	<p>Chase Checking Summary</p> <p>November 2015—December 2015</p> <p>AJD 071_C</p>			
598.	<p>Balance Overview</p> <p>Date unknown</p> <p>AJD 072_C</p>			
599.	<p>JP Morgan Statement</p> <p>November 13, 2015—December 10, 2015</p> <p>DENTON 448_C—449_C</p>			
600.	<p>JP Morgan Statement</p> <p>December 1, 2015—December 31, 2015</p> <p>DENTON 450_C—451_C</p>			
601.	<p>Fidelity Investments Investment Report</p> <p>October 1, 2015—December 31, 2015</p> <p>DENTON 452_C—463_C</p>			

602.	Gawker Media Group, Inc. Common Stock Valuation Report  July 31, 2015  DENTON 464_C—535_C			
603.	Gawker Media Summary  Date Unknown  DENTON 536_C			
604.	Gawker Media Group Inc. Balance Sheet  November 2015  DENTON 537_C			
605.	Gawker Media Group Inc. Cash Flow Statement  January 2015—November 2015  DENTON 538_C			
606.	Gawker Media Group Inc. Income Statement  January 2015—November 2015  DENTON 539_C			
607.	Fourth Amended and Restated Memorandum and Articles of Association of Gawker Media Group, Inc.  January 21, 2016  DENTON 540_C—580_C			

608.	Gawker Media Group, Inc. Amended & Restated Stockholders Agreement  January 21, 2016  DENTON 581_C—652_C			
609.	Untitled document  Date unknown  DENTON 653_C			
610.	Gawker Media LLC Income Statement  FY 2015  GAWKER 29291_C—29293_C			
611.	Documents relating to Gawker Media LLC's 2014 Tax Return  GAWKER 29294_C—29357_C			
612.	Gawker Media LLC Revenue by Month  January 2010—December 2015  GAWKER 29358_C			
613.	Silicon Valley Bank Statement  December 2015  GAWKER 29359_C			
614.	Gawker Media LLC A/R Aging Summary  December 31, 2015  GAWKER 1825_C—29362_C			

615.	Gawker Media LLC Cash Flow Statement  FY 2015  GAWKER 29363_C			
616.	2015 W-2 Wage and Tax Statement for Nick Denton  GAWKER 29364_C—29365_C			

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.

DATED: February 16, 2016.

*/s/ Kenneth G. Turkel*

\_\_\_\_\_  
Kenneth G. Turkel, Esq.

Florida Bar No. 867233

Shane B. Vogt

Florida Bar No. 0257620

BAJO | CUVA | COHEN | TURKEL

100 North Tampa Street, Suite 1900  
Tampa, Florida 33602  
Tel: (813) 443-2199  
Fax: (813) 443-2193  
Email: [kturkel@bajocuva.com](mailto:kturkel@bajocuva.com)  
Email: [svogl@bajocuva.com](mailto:svogl@bajocuva.com)

-and-

Charles J. Harder, Esq.  
PHV No. 102333  
Jennifer J. McGrath, Esq.  
PHV No. 114890  
HARDER MIRELL & ABRAMS LLP  
132 South Rodeo Drive, Suite 301  
Beverly Hills, CA 90212-2406  
Tel: (424) 203-1600  
Fax: (424) 203-1601  
Email: [charder@hmafirm.com](mailto:charder@hmafirm.com)  
Email: [jmcgrath@hmafirm.com](mailto:jmcgrath@hmafirm.com)

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 16<sup>th</sup> day of February, 2016, to the following:

Barry A. Cohen, Esquire  
The Cohen Law Group  
201 E. Kennedy Blvd., Suite 1950  
Tampa, Florida 33602  
[bcohen@tampalawfirm.com](mailto:bcohen@tampalawfirm.com)  
[jhalle@tampalawfirm.com](mailto:jhalle@tampalawfirm.com)  
[mwalsh@tampalawfirm.com](mailto:mwalsh@tampalawfirm.com)  
*Counsel for Heather Clem*

Gregg D. Thomas, Esquire  
Rachel E. Fugate, Esquire  
Thomas & LoCicero PL  
601 S. Boulevard  
Tampa, Florida 33606  
[gthomas@tlolawfirm.com](mailto:gthomas@tlolawfirm.com)  
[rfugate@tlolawfirm.com](mailto:rfugate@tlolawfirm.com)  
[kbrown@tlolawfirm.com](mailto:kbrown@tlolawfirm.com)  
[abeene@tlolawfirm.com](mailto:abeene@tlolawfirm.com)  
*Counsel for Gawker Defendants*

David R. Houston, Esquire  
Law Office of David R. Houston  
432 Court Street  
Reno, NV 89501  
[dhouston@houstonatlaw.com](mailto:dhouston@houstonatlaw.com)  
[krosser@houstonatlaw.com](mailto:krosser@houstonatlaw.com)

Seth D. Berlin, Esquire  
Paul J. Safier, Esquire  
Alia L. Smith, Esquire  
Michael D. Sullivan, Esquire  
Levine Sullivan Koch & Schulz, LLP  
1899 L. Street, NW, Suite 200  
Washington, DC 20036  
[sberlin@lskslaw.com](mailto:sberlin@lskslaw.com)  
[psafier@lskslaw.com](mailto:psafier@lskslaw.com)  
[asmith@lskslaw.com](mailto:asmith@lskslaw.com)  
[msullivan@lskslaw.com](mailto:msullivan@lskslaw.com)  
*Pro Hac Vice Counsel for  
Gawker Defendants*

Michael Berry, Esquire  
Levine Sullivan Koch & Schultz, LLP  
1760 Market Street, Suite 1001  
Philadelphia, PA 19103  
[mberry@lskslaw.com](mailto:mberry@lskslaw.com)  
*Pro Hac Vice Counsel for  
Gawker Defendants*

Timothy J. Conner  
Holland & Knight LLP  
50 North Laura Street, Suite 3900  
Jacksonville, FL 32202  
[timothy.conner@hkllaw.com](mailto:timothy.conner@hkllaw.com)

Allison M. Steele  
Rahdert, Steele, Reynolds & Driscoll, P.L.  
535 Central Avenue  
St. Petersburg, FL 33701  
[amnesteec@aol.com](mailto:amnesteec@aol.com)  
[asteel@rahdertlaw.com](mailto:asteel@rahdertlaw.com)  
[ncampbell@rahdertlaw.com](mailto:ncampbell@rahdertlaw.com)  
*Attorneys for Intervenor Times Publishing  
Company*

Charles D. Tobin  
Holland & Knight LLP  
800 17th Street N.W., Suite 1100  
Washington, D.C. 20006  
[charles.tobin@hkllaw.com](mailto:charles.tobin@hkllaw.com)  
*Attorneys for Intervenor, First Look Media,*



*Inc., WFTS-TV and WPTV-TV, Scripps Media, Inc., WFTX-TV, Journal Broadcast Group, Vox Media, Inc., WFLA-TV, Media General Operations, Inc., Cable News Network, Inc., BuzzFeed and The Associated Press.*

*/s/ Kenneth G. Turkel*  
\_\_\_\_\_  
Attorney