

Exhibit A

Mr. Bollea does not waive any objection as to the unsealing of the documents and believes that the majority of documents listed below are irrelevant to this litigation, infringe on the privacy of Mr. Bollea, and that their unsealing will cause harm to Mr. Bollea. Without prejudice to that position, Mr. Bollea acknowledges that the documents below are either publicly available or are similar to those unsealed by the DCA on March 17, 2016 and so in the interest of avoiding needless litigation and writ proceedings from the Intervenors, does not oppose the removal of the confidentiality designation from the following documents.

Mr. Bollea's position as it relates to the audio and video recordings of himself and third parties, including without limitation the "sting audio" and all surreptitiously recorded footage, is clear and the inadvertent inclusion of any such file below is in error and not intended consent to the unsealing of same.

1. Defendants' Motion to Dismiss on Grounds of Fraud on the Court and exhibits 1 through 16, and 18 through 63 thereto;

(Mr. Bollea does **not** consent to the unsealing of Exhibit 17)

2. All exhibits to Defendants' Motion to Compel Improperly Withheld Documents;

3. Defendants' Motion for Access to Corrected and Unredacted DVDs, including the full brief and all exhibits thereto;

4. Plaintiff's Omnibus Response in Opposition to Defendants' "Disguised Motion for Rehearing," including the full brief and all exhibits thereto;

5. Defendants' Motion *in Limine* No. 1: Evidence Concerning the FBI Investigation and exhibits 1 through 6 and 8 through 15 thereto;

(Mr. Bollea does **not** consent to the unsealing of Exhibit 7)

6. Defendants' Motion *In Limine* No. 2: Evidence Concerning Plaintiff's Use Of Racial Slurs On A Sex Tape and exhibits 1 through 14 and 16 through 19 thereto;

(Mr. Bollea does **not** consent to the unsealing of Exhibit 15)

7. Appendix Containing A Timeline Of Key Events, Evidence, And Testimony In Support Of Defendants' Motion *In Limine* No. 2: Evidence Concerning Plaintiff's Use Of Racial Slurs On A Sex Tape, and exhibits thereto;

8. Defendants' Motion In Limine No. 3: Relevant Excerpts From DVDs Produced By The FBI and exhibits thereto;

9. Defendants' Supplemental Brief Re: Plaintiff's Motion In Limine No. 3 To Exclude Evidence Or Argument Related To Settlement, and exhibits thereto; and

10. Defendants' Opposition to Plaintiff's Motion in Limine No. 24: To Exclude Argument or Evidence of Illegally Recorded Audio of Terry Bollea and Any Evidence Derived Therefrom, and exhibits thereto.