

EXHIBIT 14



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VIA EMAIL

Michael Berry, Esq.
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Re: *Terry Bollea v. Heather Clem, Gawker Media LLC, et al.*
No. 12012447-CI-011

Dear Michael:

Per your request, below is a chart more specifically outlining our objections to the non-party subpoenas that Gawker has noticed its intention to serve. Generally speaking, Plaintiff has serious concerns with the scope of the discovery sought, including because many of the requests are in direct violation of Judge Campbell's February 26, 2014 Order, which ruled that inquiry into Mr. Bollea's financial records is **prohibited**, and also because the subpoenas are excessively overbroad and appear to be fishing expeditions designed to interfere with and damage Mr. Bollea's business relationships.

ENTITY SERVED	REQUESTS	BASIS FOR OBJECTIONS
1. <u>Bay Harbor Hotel and Convention Center, LLC</u> ("Bay Harbor"), owners and operators of Terry' Bollea's restaurant, Hogan's Beach	Requests 5-12	On February 26, 2014, Judge Campbell entered a protective order limiting the scope of discovery in this case, and found that Mr. Bollea's financial records are not discoverable. The Court based its order on the scope of Mr. Bollea's claims and the fact that he is not seeking the kinds of damages (for instance, damage to his career) that would justify discovery of his financial dealings and employment and business contracts. Thus, these requests are an attempt to obtain from non-parties what the Court has already ruled Gawker may not obtain. They are also violative of Mr. Bollea's constitutional privacy rights.

ENTITY SERVED	REQUESTS	BASIS FOR OBJECTIONS
		<p>In addition, such requests are overbroad, not reasonably calculated to lead to the discovery of admissible evidence, and an invasion of Bay Harbor’s privacy by seeking its private financial information when that information is not relevant to the claims or defenses in this action. <i>See Rappaport v. Mercantile Bank</i>, 17 So. 3d 902, 906 (Fla. 2d DCA 2009) (holding that “the disclosure of personal financial information may cause irreparable harm to a person forced to disclose it, in a case in which the information is not relevant”); <i>see also Diaz-Verson v. Walbridge Aldinger Co.</i>, 54 So. 3d 1007, 1010 (Fla. 2d DCA 2010) (same).</p>
<p>2. <u>Ben Mallah</u>, Terry Bollea’s business partner in the Hogan’s Beach restaurant</p>	<p>Requests 5–12</p>	<p>As explained in relation to the Bay Harbor subpoena, above, the requests seek documents that Judge Campbell already ordered were off limits in discovery, violate Mr. Bollea’s constitutional privacy rights, and impermissibly seek the private financial information of a non-party.</p>
<p>3. <u>Wortman Works Media & Marketing, Inc.</u>, Ms. Pomeroy’s media and marketing firm</p>	<p>Request 6 Requests 5, 11 and 12</p>	<p>Request 6 is in violation of Judge Campbell’s February 26, 2014 protective order, which states that “inquiry into the . . . financial records . . . of Terry Bollea . . . is hereby prohibited” and violates Mr. Bollea’s constitutional privacy rights.</p> <p>Requests 5, 11 and 12 are burdensome, impermissibly overbroad and not reasonably calculated to lead to the discovery of admissible evidence. The requests impermissibly sweep beyond communications relating to the sex video at issue in this litigation to private financial matters covered by the February 26, 2014 protective order and other private matters having nothing to do with this case.</p>

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<p>4. <u>Jules Wortman Pomeroy</u>, former publicist with TNA</p>	<p>Request 6 Requests 5, 11 and 12</p>	<p>Request 6 is in violation of Judge Campbell’s February 26, 2014 protective order, which states that “inquiry into the . . . financial records . . . of Terry Bollea . . . is hereby prohibited” and violates Mr. Bollea’s constitutional privacy rights.</p> <p>Requests 5, 11 and 12 are burdensome, impermissibly overbroad and not reasonably calculated to lead to the discovery of admissible evidence. The requests impermissibly sweep beyond communications relating to the sex video at issue in this litigation to private financial matters covered by the February 26, 2014 protective order and other private matters having nothing to do with this case.</p>
<p>5. <u>Tech Assets, Inc.</u>, operator of Hostamania, a web hosting service that is the result of a business partnership between Terry Bollea and Tech Assets</p>	<p>Requests 5–13</p>	<p>Again, the requests seek documents that Judge Campbell already ordered were off limits in discovery, violate Mr. Bollea’s privacy rights, and impermissibly seek the private financial information of a non-party.</p> <p>There also is no conceivable relevancy to the outtakes from the recording of the wrecking ball advertisement.</p>
<p>6. <u>Marc Hardgrove</u>, owner of Tech Assets, Inc., which operates Hostamania, a web hosting service that is the result of a business partnership between Terry Bollea and Tech Assets</p>	<p>Requests 5–13</p>	<p>As explained above, the requests seek documents that Judge Campbell already ordered were off limits in discovery, violate Mr. Bollea’s privacy rights, and impermissibly seek the private financial information of a non-party.</p> <p>There also is no conceivable relevancy to the outtakes from the recording of the wrecking ball advertisement.</p>
<p>7. <u>Peter Young, Sovereign Talent Group</u>, Terry Bollea’s talent agent</p>	<p>Requests 5–12</p>	<p>As explained in relation to the Bay Harbor subpoena, above, the requests seek documents that Judge Campbell already ordered were off limits in discovery,</p>

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		<p>violate Mr. Bollea’s constitutional privacy rights, and impermissibly seek the private financial information of a non-party.</p> <p>They also are burdensome, overbroad and not reasonably calculated to lead to the discovery of admissible evidence.</p>
<p>8. <u>TNA Entertainment, LLC (“TNA”)</u>, management and production company specializing in professional wrestling; Terry Bollea has a business contract with TNA to provide wrestling and entertainment services in connection with their programming and events</p>	<p>Requests 10, 12, and 18–23</p> <p>Requests 7 & 9</p>	<p>Requests 10, 12, and 18 through 23 are in violation of Judge Campbell’s February 26, 2014 protective order, violate of Mr. Bollea’s constitutional privacy rights, and impermissibly seek the private financial information of a non-party.</p> <p>Requests 7 & 9 are overbroad and not reasonably calculated to lead to the discovery of admissible evidence.</p>
<p>9. <u>Prince Marketing Group</u>, Mr. Prince’s sports and entertainment marketing firm</p>	<p>Requests 5–12</p> <p>Topics 9–16</p>	<p>The requests and topics are in violation of Judge Campbell’s February 26, 2014 protective order, violate of Mr. Bollea’s constitutional privacy rights, and impermissibly seek the private financial information of a non-party.</p> <p>They are also burdensome, overbroad and not reasonably calculated to lead to the discovery of admissible evidence.</p>
<p>10. <u>Darren Prince</u>, Terry Bollea’s marketing agent</p>	<p>Requests 5–12</p>	<p>The requests are in violation of Judge Campbell’s February 26, 2014 protective order, violate of Mr. Bollea’s constitutional privacy rights, and impermissibly seek the private financial information of a non-party.</p> <p>They are also burdensome, overbroad and not reasonably calculated to lead to the discovery of admissible evidence.</p>

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<p>11. <u>World Wrestling Entertainment, Inc.</u>, professional wrestling promotion; Terry Bollea has a business contract with WWE to provide wrestling and entertainment services in connection with their programming and events</p>	<p>Requests 4–18 Topics 7–16</p>	<p>The requests and topics are in violation of Judge Campbell’s February 26, 2014 protective order, violate of Mr. Bollea’s constitutional privacy rights, and impermissibly seek the private financial information of a non-party.</p> <p>The requests also impermissibly seek the private financial information of a non-party.</p>
<p>12. <u>Cox Media Group</u>, owner and operator of radio stations broadcasting the Bubba the Love Sponge Show</p>	<p>Requests 2–5</p>	<p>The requests are burdensome, impermissibly overbroad and not reasonably calculated to lead to the discovery of admissible evidence.</p>

I look forward to our call tomorrow afternoon. Please feel free to contact me with any questions or concerns. Nothing contained herein is intended as a waiver of any rights or claims.

Very truly yours,



CHARLES J. HARDER OF
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