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August 27, 2014

**VIA EMAIL**

The Honorable James R. Case  
137 Lookout Lane  
Whitefish, Montana 59937

**VIA EMAIL**

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601 S. Boulevard  
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**VIA EMAIL**

Seth D. Berlin, Esq.  
Alia L. Smith, Esq.  
Levine Sullivan et al.  
1899 L. Street, NW, Suite 200  
Washington, DC 20036

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

**Plaintiff Terry Gene Bollea's Request for Additional Interrogatories to Propound to Defendant Gawker Media, LLC**

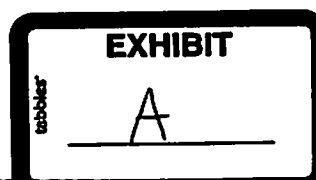
Dear Judge Case and Counsel:

We write to request that Mr. Bollea be allowed to propound an additional thirty (30) interrogatories to Defendant Gawker Media, LLC ("Gawker") beyond the thirty (30) interrogatories permitted by Fla. R. Civ. P. 1.340(a). Good cause exists for this request, as follows:

First, to date, Mr. Bollea has propounded 27 interrogatories to Gawker, eight (8) to Defendant Nick Denton ("Denton") and six (6) to Defendant A.J. Daulerio ("Daulerio")—totaling 41 interrogatories. Gawker, Denton and Daulerio have propounded to Mr. Bollea 20, 16 and 10 interrogatories, respectively—totaling 46 interrogatories collectively.

Whereas the interrogatories propounded by Mr. Bollea to Gawker, Denton and Daulerio relate only to information uniquely within each such defendant's possession, the interrogatories propounded to Mr. Bollea by Gawker, Denton and Daulerio—all represented by the same counsel—relate to all three defendants' mutual defenses and the case more generally, rather than relating specifically to the propounding defendant. Thus, Mr. Bollea is at a disadvantage in terms of the number of interrogatories he is allowed to propound as compared with the number of interrogatories Mr. Bollea must answer.

Second, this is a high-level litigation involving eight causes of action and five defendants, with discovery ongoing for more than a year, including the taking of five depositions, production of more than 26,000 pages of documents, numerous third-party subpoenas, and numerous related



motions and appeals. Mr. Bollea needs the ability to serve additional interrogatories to seek information relevant to the case. His request for only 30 additional interrogatories, to propound to Defendant Gawker only, is reasonable and necessary under these circumstances.

We will be prepared to discuss these issues during the August 29, 2014, scheduling conference with Judge Case. Please feel free to contact me with any questions or concerns.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Charles J. Harder', with a long horizontal flourish extending to the right.

CHARLES J. HARDER Of  
**HARDER MIRELL & ABRAMS LLP**

cc: Paul J. Safier (by email)  
Michael Berry (by email)  
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