

EXHIBIT 19

Alia Smith

From: Douglas Mirell <dmirell@hmafirms.com>
Sent: Tuesday, August 19, 2014 2:10 PM
To: Alia Smith
Cc: Seth Berlin; Charles Harder; dhouston@houstonatlaw.com; Ken Turkel (KTurkel@bajocuva.com); Christina.Ramirez@bajocuva.com
Subject: RE: Bollea v. Gawker -- correspondence
Attachments: Bollea Motion to Compel Further Response re Kinja Affiliate Websites (....pdf; Mirell Affidavit ISO Motion to Compel Further Response re Kinja Affili....pdf; Ex F to Mirell Affidavit ISO Motion to Compel Further Response re Kinjapdf; Ex E to Mirell Affidavit ISO Motion to Compel Further Response re Kinjapdf; Ex D to Mirell Affidavit ISO Motion to Compel Further Response re Kinjapdf; Ex C to Mirell Affidavit ISO Motion to Compel Further Response re Kinjapdf; Ex B to Mirell Affidavit ISO Motion to Compel Further Response re Kinjapdf; Ex A to Mirell Affidavit ISO Motion to Compel Further Response re Kinjapdf; Ex G to Mirell Affidavit ISO Motion to Compel Further Responses re Kinja....pdf

Dear Alia,

We expect that the attached motion will be formally filed in Florida by the end of the day today.

We are doing so for at least the following reasons: (1) the parties' positions have already been clearly articulated in our exchange of correspondence (see attached Exhibits "D" and "E"), thus fully satisfying all of our "meet and confer" obligations; (2) since you have not suggested that there is any flexibility whatsoever in your client's posture vis-à-vis any of the issues in dispute, no purpose served by further delaying service of this motion; (3) in reading your below email, a phone call with you appears to be an exercise in futility since you obviously lack the requisite authority to alter any of your client's positions; and (4) if, after receiving our moving papers and upon Mr. Berlin's return from his vacation, your firm has anything further to address with us in advance of your opposition deadline, we'll be happy to discuss same with you and, if appropriate, give due consideration to a stipulation delaying that opposition deadline and/or amending the attached motion.

Sincerely,

Doug



DOUGLAS E. MIRELL, ESQ.
HARDER MIRELL & ABRAMS LLP
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Los Angeles, CA 90067-2749
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From: Alia Smith [mailto:ASmith@lskslaw.com]
Sent: Saturday, August 16, 2014 1:59 PM
To: Douglas Mirell
Cc: Seth Berlin; Charles Harder; dhouston@houstonatlaw.com; Ken Turkel (KTurkel@bajocuva.com);
Christina.Ramirez@bajocuva.com
Subject: RE: Bollea v. Gawker -- correspondence

Dear Doug,

I received your message after I had left the office early yesterday to celebrate my daughter's 7th birthday, which is the reason for the Saturday response.

I must admit that I was taken aback that you would not wait one week for Seth's return from vacation for a proper meet and confer, given that (a) we responded to your letter close to two weeks ago and you are only responding now because you yourself were on vacation, (b) its substance relates to discovery responses that in many cases were served almost five months ago, (c) we filed a Notice of Unavailability for Seth's vacation, (d) we respected the Notice of Unavailability that Charles filed for his vacations, including in connection with extended discussions over third party discovery we are attempting to serve, and (e) when plaintiff did the exact same thing last year -- refusing to delay a meet and confer to accommodate a vacation, and then rushing to Court with a motion to compel -- Judge Campbell made clear to all counsel that this was not the conduct she expected. Indeed, the Court has written standards of professional conduct that frown upon such tactics. See Standards of Prof. Courtesy in 6th Jud. Dist. of Fla., Standard 7B (counsel expected to "grant reasonable requests for scheduling," etc. to opposing side).

That said, although not the most efficient way for us to proceed, I nevertheless agree to confer with you next week, without Seth, to discuss the issues raised by your letter, and if I am not able to address all of the issues myself, will follow up and get back to you as promptly as possible. Although I am willing to do so to avoid a further dispute over the scheduling of a meet and confer, going forward, I very much hope that you will accommodate our reasonable scheduling requests, and we will afford you and your colleagues the same courtesy.

Wednesday is the best day for me to talk -- I am free all day until 5 PM EDT. Thanks.

Best,
Alia

Alia L. Smith

 LEVINE SULLIVAN
KOCH & SCHULZ, LLP
(202) 508-1125 | Phone

From: Douglas Mirell [mailto:dmirell@hmafirm.com]
Sent: Friday, August 15, 2014 2:55 PM
To: Alia Smith
Cc: Seth Berlin; Charles Harder; dhouston@houstonatlaw.com; Ken Turkel (KTurkel@bajocuva.com);
Christina.Ramirez@bajocuva.com
Subject: RE: Bollea v. Gawker -- correspondence

Dear Alia,

I am happy to schedule a call with you early next week to determine whether indeed "any common ground or compromise" is possible, but we're not inclined to await Seth Berlin's return -- particularly in light of your August 4th letter which strongly suggests you have little intention of compromising on any of the points in dispute. [Upon sending my email to you yesterday, I received a blowback message indicating that Mr. Berlin is out of the office until August 25th.]

Assuming you have the requisite authority to discuss and adopt the compromises that would be necessary to avoid a motion to compel, please let me know your availability as soon as possible. I have a

noon lunch meeting on Monday and a 10 AM conference call on Tuesday (all PDT), but can otherwise make myself available on either of those days.

Sincerely,
Doug



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From: Alia Smith [<mailto:ASmith@lskslaw.com>]
Sent: Friday, August 15, 2014 9:30 AM
To: Douglas Mirell
Cc: Seth Berlin; Charles Harder; dhouston@houstonatlaw.com; Ken Turkel (KTurkel@bajocuva.com); Christina.Ramirez@bajocuva.com
Subject: RE: Bollea v. Gawker -- correspondence

Dear Doug,

Thank you for your email. Just to be clear, we remain open to discussing plaintiff's positions to assess whether the parties are able to find any common ground or compromise. We think that plaintiff's approach to this discovery is unfortunate, particularly since much of your letter relates to discovery responses that Gawker served many months ago. We do not understand plaintiff's refusal to meet and confer about these requests nor plaintiff's desire to proceed directly to court without first talking about the open issues. This approach does not seem consistent with the court's expectations or the approach taken when other discovery issues have arisen. For instance, when plaintiff objected to subpoenas Gawker is trying to issue to third-party witnesses, Mike Berry and Charles Harder held several weeks of discussions. Through those discussions, we were able to resolve some of plaintiff's concerns, narrow the issues in dispute, and save the parties and the court needless litigation. We would hope to engage in discussions with you on the issues plaintiff has raised in the same spirit. While those discussions might not resolve the disputes, as you suggest, we think it is worth the effort to try, and, as I said, remain open to talking with you.

Please let me know if you change your mind about holding a "meet and confer," and we will, of course, work with you to schedule something mutually convenient.

Thank you very much.

Best,
Alia

Alia L. Smith



(202) 508-1125 | Phone

From: Douglas Mirell [<mailto:dmirell@hmafirm.com>]

Sent: Thursday, August 14, 2014 5:50 PM

To: Alia Smith

Cc: Seth Berlin; Charles Harder; dhouston@houstonatlaw.com; Ken Turkel (KTurkel@bajocuva.com); Christina.Ramirez@bajocuva.com

Subject: RE: Bollea v. Gawker -- correspondence

Dear Ms. Smith,

Thank you for your below email. Having just returned from a 12-day vacation, I have now had an opportunity to review your letter of August 4, 2014, which responds to my correspondence of July 25, 2014. We agree that your letter "addresses" each of the issues raised in my July 25th letter and we have no "additional concerns" beyond our fundamental disagreement with the positions you have articulated and continue to maintain in response to Mr. Bollea's discovery requests. Thus, given the posture you have assumed in your August 4th letter, we do not believe that any additional "meet and confer" efforts are either necessary or likely to prove productive. Accordingly, with the exception of our determination not to pursue a further response from Gawker to Request No. 122 of Mr. Bollea's Fourth Set of Requests for Production (premised expressly upon your representation "that the Kinja software was not used until approximately six months after the publication of the post at issue"), we will be preparing a motion to compel further responses to the balance of the disputed issues addressed in the parties' exchange of correspondence.

Sincerely,
Doug Mirell



DOUGLAS E. MIRELL, ESQ.

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From: Alia Smith [<mailto:ASmith@lskslaw.com>]

Sent: Tuesday, August 05, 2014 6:10 AM

To: Douglas Mirell

Cc: Seth Berlin

Subject: RE: Bollea v. Gawker -- correspondence

Hi Doug. I got your out-of-office message that you are out through August 13. When you are back and re-settled, please just let me know when would be a good time to speak. Subject to mine and Seth's travel and vacation schedules, we can try to set something up. Thanks.

--Alia

Alia L. Smith



(202) 508-1125 | Phone

From: Alia Smith

Sent: Monday, August 04, 2014 6:27 PM

To: dmirell@hmfirma.com; 'Charles Harder (charder@hmfirma.com)'; 'dhouston@houstonatlaw.com'; 'Ken Turkel'; 'Christina K. Ramirez'; 'bcohen@tampalawfirm.com'; 'mgaines@tampalawfirm.com'

Cc: gthomas@tlolawfirm.com; Rachel E. Fugate; Seth Berlin; Michael Sullivan; Michael Berry; Paul Safier; Julie Ehrlich

Subject: Bollea v. Gawker -- correspondence

Counsel, please see the attached letter. Thank you.

Best,

Alia

Alia L. Smith



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