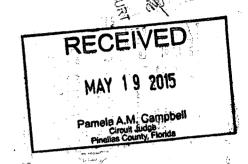
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May 19, 2015

VIA HAND DELIVERY

The Honorable Pamela A.M. Campbell Civil Division, Section 11 St. Petersburg Judicial Building 545 1st Avenue North, Room 300 St. Petersburg, Florida 33701



Re:

Terry Gene Bollea v. Heather Clem, Gawker Media, LLC, et al

Circuit Court of the Sixth Judicial Council in and for Pinellas County, Florida Case Number 12012447CI-011

Dear Judge Campbell:

On May 7, 2015, the Second DCA entered an order, ruling on the petition for writ of certiorari filed by Kinja, KFT (fka Blogwire Hungary Szellemi Alkotast Hasznosito, KFT), in connection with this Court's order severing Kinja and setting a trial date as to the remaining defendants for July 6, 2015. The Second DCA's order reads: "We grant the petitions for writs of certiorari and we quash the circuit court's order severing Bollea's claims against Blogwire Hungary Szellemi Alkotast Hasznosito, KFT for trial and its order setting a trial date for Bollea's claims against the Gawker defendants. An opinion will follow."

The Second DCA has not yet issued its opinion to explain its reasoning. If the Second DCA's reasoning turns out to be that there should be one trial in this case involving all defendants, then Mr. Bollea likely will file a dismissal of Kinja, so as to preserve the July 6 trial date, and allow a trial to proceed as to the remaining defendants. This case has been pending for more than two-and-a-half years, extensive discovery has been conducted, and the parties are actively preparing for a trial on July 6. Thus, Mr. Bollea is very concerned about losing the July 6 trial date, and having the matter re-set for a new trial date in the distant future. Mr. Bollea is reluctant to take any action, however, until the Second DCA has issued its opinion and stated its reasoning.

Accordingly, Mr. Bollea requests that: (1) at the time of the scheduled May 29, 2015 hearing on pending motions, this Court hold a status conference to discuss the effect of the Second DCA's order; and (2) the Court continue to reserve the dates of July 6–17 for a jury trial in this matter (even if the Court formally vacates the trial date in response to the Second DCA's order) so that Mr. Bollea can file a request to dismiss Kinja (if appropriate following entry of the Second DCA's opinion), and keep the July 6 trial date.

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Thank you for your consideration of this matter.

Respectfully,

BAJO | CUVA | COHEN | TURKEL

Kenneth G. Turkel

KGT/td

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