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August 10, 2016

Via Email [gthomas@tlolawfirm.com]

Gregg D. Thomas, Esquire Thomas & LoCicero PL 601 S. Boulevard Tampa, Florida 33606

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

Circuit Court of the Sixth Judicial Circuit in and for Pinellas County, Florida

Case Number 12012447CI-011

Dear Gregg:

This is in response to your August 9, 2016 letter regarding A.J. Daulerio. At this time, we cannot agree to withdraw the Renewed Motion for Sanctions, nor to withdraw or modify the Writ of Garnishment.

As for the Renewed Motion for Sanctions, the employment agreement you reference in your letter, which you also filed yesterday, is between Mr. Daulerio and Gawker Entertainment, LLC. As you know, Gawker Entertainment, LLC dissolved. To our knowledge, Mr. Daulerio never disclosed indemnity rights against Gawker Media, LLC or Gawker Media Group, Inc. If you have evidence demonstrating that these indemnity rights were disclosed, please let us know so that we can reconsider our position.

As for the Writ of Garnishment, I appreciate your position that Mr. Daulerio may have statutory and constitutional exemptions. However, we have been denied current financial worth discovery regarding Mr. Daulerio, and have no way of verifying whether he has cash or other bank accounts in addition to the Chase account that was garnished. For example, at one time, Mr. Daulerio had access to significant funds being held in RG Free bank accounts. We have no idea what happened to these funds. Consequently, while we may be willing to dissolve or modify the Writ of Garnishment if the Chase account is all Mr. Daulerio has, we cannot do so at this time.

Very truly yours,

BAJO | CUVA | COHEN | TURKEL

3

Shane B. Vogt

100 North Tampa Street, Suite 1900, Tampa Florida 33602
Telephone: (813) 443-2199 / Facsimile: (813) 443-2193
www.BajoCuva.com