

EXHIBIT C

Molly Odell

From: Charles Harder
Sent: Thursday, June 06, 2013 9:39 AM
To: 'Seth Berlin'; 'Ken Turkel (KTurkel@bajocuva.com) (KTurkel@bajocuva.com)'; 'cramirez@BajoCuva.com'; 'dhouston@houstonatlaw.com'
Cc: 'gthomas@tlolawfirm.com'; 'Rachel E. Fugate'; 'Paul Safier'
Subject: RE: Bollea v. Clem, Gawker Media LLC et al.

Dear Seth,

I am not going to address each of the points in your letter of today because it would not be a productive use of my time; you seem pretty entrenched in your positions. Suffice it to say that I generally disagree with your positions. Regarding deposition scheduling, however, you are wrong when you say that we did not reach out to schedule deposition dates before sending deposition notices. Ken Turkel called and spoke to Gregg Thomas several weeks ago asking for available deposition dates for all Gawker defendants. Mr. Thomas never got back to us with any dates. Thus, we noticed the depositions on dates convenient for us. On May 29, you told me that you were not available on July 10 or 11, but that you were available the week of July 15. Accordingly, I moved the depositions from the week of July 8 to the week of July 15, to accommodate your schedule. I remain willing to discuss scheduling of depositions, as well as scheduling of document production. And, no, my letter of yesterday did not state or imply that I would bring a motion to compel before the 30 day period to respond. I was merely putting you on notice that we promptly will file motions to compel if we do not receive good faith substantive responses to the discovery at issue, including an agreement to produce non-privileged responsive documents, and at least substantial document production, if not complete production. As I have told you twice now, we will accommodate a reasonable request for a little more time to produce responsive documents that cannot be produced within the 30 day statutory period.

Please note that I am leaving off of this email counsel for Heather Clem. You had an issue with the fact that I included them on my letter of yesterday, and I don't see the point in including them in these meet and confer discussions because the discovery is not directed at their client. All rights reserved.

Sincerely,

Charles Harder

From: Seth Berlin [<mailto:SBerlin@lskslaw.com>]
Sent: Thursday, June 06, 2013 8:48 AM
To: Charles Harder; Ken Turkel (KTurkel@bajocuva.com) (KTurkel@bajocuva.com); cramirez@BajoCuva.com; dhouston@houstonatlaw.com
Cc: bcohen@tampalawfirm.com; D Keith Thomas (dkthomas@tampalawfirm.com); Michael W. Gaines (mgaines@tampalawfirm.com); gthomas@tlolawfirm.com; Rachel E. Fugate; Seth Berlin; Paul Safier
Subject: Bollea v. Clem, Gawker Media LLC et al.

Counsel –

Please see attached. Thank you.

Seth D. Berlin

LSKS | LEVINE SULLIVAN
KOCH & SCHULZ, LLP
1899 L Street, NW
Suite 200

Washington, DC 20036
(202) 508-1122 | Phone
(202) 861-9888 | Fax
www.lskslaw.com