EXHIBIT B

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VIA EMAIL

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

Dear Counsel:

Thank you for your prompt reply. Last night's letter from Charles is most unfortunate, in substance and in particular in tone. I do not think any good purpose would be served by responding to each point, but let me briefly address the following:

First, when we spoke last week, I did in fact note that the discovery was voluminous, as it obviously is. If it were not, I would not have requested more time to respond. Your assertion that this fact is some newly-minted reason for our requested extension is incorrect. Indeed, my follow up email specifically stated: "I have not heard back from you regarding our request for a 30 day extension on responding to the *voluminous discovery* served by plaintiff on Gawker Media (including 88 requests for production of documents, 22 requests for admission and ten interrogatories (including multiple subparts))" (emphasis added).

Second, although you assert, without any basis, that Gawker plans to sit on its hands rather than engage in discovery, we have already begun the process of collecting responsive information and documents. To that end, I am spending next Tuesday and Wednesday in New York meeting with my clients to continue that process. That Gawker is having its new counsel do so on her second and third day of work illustrates that Gawker is indeed making this a priority. While we do believe that certain of the requests are objectionable, and do not intend to waive those objections, your accusation that Gawker does not intend to comply with its obligations is without any justification, as is your apparent plan to file some sort of pre-emptive motion to compel even before the initial thirty day period for Gawker to respond has run.

Third, I did not, as you assert, say that we could proceed with depositions the week of July 15, only that I personally was not available on July 10 or 11. I explained that I needed to coordinate the deposition schedule with the witnesses and that, despite the fact that you had noticed dates without consulting us (as is required), I would endeavor to do so. In my follow up email, I subsequently urged you to provide me with several options for dates on which you were available to facilitate that process. In your response, you instead insisted that all four depositions be completed on four specific dates you had unilaterally selected in July. You are of course free to pursue discovery in any order you like, but it is unreasonable to insist that you are entitled to schedule depositions six weeks after serving initial written discovery, some of which might reasonably draw objections and may require the court to resolve them, and then also assert an entitlement to depose witnesses multiple times.

Fourth, your letter seems to assert that, because my colleagues and I have dropped everything else to respond to plaintiff's six successive motions for preliminary injunctive relief, each purporting to be brought on an emergency basis, it is somehow improper to ask for a modest extension in responding to routine discovery on a non-emergency basis. Particularly given that we have regularly agreed to postponements to suit your schedule, and that the Court granted your motion for another 120 days to effect service, it is not realistic for you to expect that both we and our client can and should treat the civil discovery process as an ongoing emergency.

Fifth, your assertions that we have engaged in bad faith litigation tactics, or that plaintiff is somehow entitled to monetary sanctions for bad faith discovery practices, when discovery was only served for the first time two weeks ago, are unfounded.

Finally, to receive the letter like yours about discovery when we are only two weeks into the process is really troubling. Suffice it to say that we will have no choice but to seek the court's intervention. We will as part of our motion ask the Court to remind counsel of their obligations to work cooperatively and to conduct themselves civilly, even where they disagree with one another.

Sincerely,

LEVINE SULLIVAN KOCH & SCHULZ, LLP

By: _____
Seth D. Berlin

cc: Other Counsel of Record