

EXHIBIT B

ELECTRONICALLY FILED 11/12/2013 2:56:41 PM: KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

From: Seth Berlin
Sent: Thursday, October 25, 2012 8:58 AM
To: 'fredrick.mcclure@dlapiper.com'; 'colin.thompson@dlapiper.com';
'charder@wrslawyers.com'; 'dhouston@houstonatlaw.com'
Cc: gthomas@tlolawfirm.com; Seth Berlin; Paul Safier
Subject: Bollea v. Gawker

Counsel –

My colleague Paul Safier and I are working with Thomas LoCicero, our Florida counsel in this matter. We will be shortly be appearing on behalf of Gawker Media LLC and moving for pro hac vice admission. We appreciate the consent you had earlier provided to those pro hac vice motions. It is unclear which of you would be the proper person to contact, but I wanted to see if I might have a call with the appropriate person about service of process, the various defendants, and a timeline for responding to the Complaint.

In anticipation of that call, I wanted to convey a couple of things. First, I understand that process servers have tried to leave the Summons and Complaint with both Gregg and then a receptionist in New York. While we disagree that those steps are valid service, we would like to work cooperatively on issues like this. Second, I wanted to advise that the only entity that publishes the video challenged in plaintiff's Complaint is Gawker Media LLC, and, although we oppose such relief, it would be the proper entity to remove the video were an injunction entered. We believe that the three individual defendants are similarly not essential to plaintiff's prosecution of his case and, like the entities other than Gawker Media LLC, are not in any event subject to the jurisdiction of the Florida court. While we could all litigate various satellite motions on each of these issues, we would prefer to streamline things so we focus on the core issues you have raised and to avoid having the parties burden the Court with other issues. While we are happy to discuss this further, and answer any questions you might have, we would propose to accept service of the Summons and Complaint on behalf of Gawker Media LLC and, based on the representation above that it is the party responsible for publishing (and if ordered taking down) the video at issue, would ask that you voluntarily dismiss the remaining defendants so that we can all focus on what we understand to be plaintiff's primary issue.

I would also like to work out a mutually agreeable schedule for answering or otherwise responding to the Complaint, and any other such scheduling issues you might have (I know Colin has emailed Gregg about a couple of issues over the past couple of days). I would appreciate it if one of you could please raise your hand and let me know when would be a convenient time to have a call to address these issues. Thank you.

Regards,

Seth D. Berlin
Managing Partner

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