

EXHIBIT 6

January 6, 2014

VIA ELECTRONIC MAIL

Charles J. Harder, Esq.
Harder Mirell & Abrams LLP
1925 Century Park East, Suite 800
Los Angeles, CA 90067

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

Dear Charles:

This letter responds to yours of December 31, 2013, which was emailed to us at 6:30 p.m., and which makes various threats if Gawker failed to meet your numerous demands within two business days.

With respect to your Point I, Mr. Daulerio and Gawker intend to produce over the next week any additional documents not previously produced in response to plaintiff's two prior rounds of sweeping document requests. In that regard, we renew our request that plaintiff provide supplemental discovery responses, included as ordered more than two months ago at the October 25, 2013 hearing and as addressed in our December 12, 2013 correspondence.

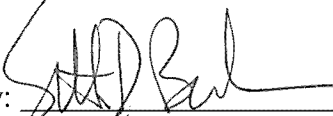
With respect to your Point II, we have previously addressed this issue in our December 12 letter and are perplexed why you found it necessary on New Year's Eve to rehash the same issue. As you know, Gawker has moved for reconsideration of the court's ruling, including based on additional testimony about the burden involved, with respect to Plaintiff's Request No. 28 and has, in the alternative, moved for a stay pending appeal. Plaintiff has only just today filed an opposition. Moreover, Gawker is unable to seek appellate review, or a stay from the DCA, until the trial court issues written orders (a) directing production and (b) denying a stay. *See, e.g.*, Fla. R. App. P. 9.100(c)(1), 9.020(i) & 9.310(a). With respect to the former, no proposed form order has been submitted to the Court because ***plaintiff*** has failed to send us an alternative to Gawker's proposed order for more than a month. Under these circumstances, complaining about a failure to obtain a stay pending appeal, filing another motion to compel or seeking to hold Gawker in contempt would, in our view, be a complete waste of time and resources.

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Although we believe that plaintiff's various threatened motions are at the very least premature, we remain committed to providing meaningful responses to discovery and are willing to cut to the chase about discovery issues. Should you believe that it would be productive to discuss the issues raised by your letter, please do not hesitate to give us a call. Thank you.

Sincerely,

LEVINE SULLIVAN KOCH & SCHULZ, LLP

By: 

Seth D. Berlin
Alia L. Smith

cc: Other Counsel of Record