

Exhibit E

ELECTRONICALLY FILED 2/13/2014 11:23:55 AM: KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

Alia Smith

From: Charles Harder <charder@hmafirm.com>
Sent: Tuesday, January 28, 2014 9:53 PM
To: Seth Berlin
Subject: Bollea's responses to Daulerio Rog 10 and Gawker RPD
Attachments: HH Response to Second Set of Rogs from AJ Daulerio (00029470xCE2FC).pdf; HH Response to Second RPD from Gawker Media LLC (00029469xCE2FC).pdf

Seth:

We already responded to Interrog. 10 from Daulerio, and RPD 54 from Gawker. See attached. We will not be providing a further response to those discovery items because the information sought is objectionable, as stated in the responses.

Charles



CHARLES J. HARDER

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Alia Smith

From: Seth Berlin
Sent: Friday, January 24, 2014 7:52 PM
To: 'Charles Harder'
Cc: Seth Berlin; gthomas@tlolawfirm.com; Paul Safier; Alia Smith
Subject: RE: Bollea, Traub & EJ Media Group Discovery Responses

Charles -- I am happy to extend a few extra days, but if we are left with insufficient time to obtain telephone records from his provider(s), I will have to reserve our ability to recall Mr. Bollea (and if necessary other witnesses) for deposition. It remains my hope that we can get what we need in time and that will not be necessary. Thank you.

Seth

Seth D. Berlin



From: Charles Harder [mailto:charder@hmafirm.com]
Sent: Friday, January 24, 2014 7:49 PM
To: Seth Berlin
Cc: Alia Smith; gthomas@tlolawfirm.com
Subject: RE: Bollea, Traub & EJ Media Group Discovery Responses

Can you please extend the deadline that again until Weds. of next week? I will be on it on Monday. Thank you.

From: Seth Berlin [mailto:SBerlin@lskslaw.com]
Sent: Friday, January 24, 2014 4:47 PM
To: Charles Harder
Cc: Alia Smith; gthomas@tlolawfirm.com; Seth Berlin
Subject: RE: Bollea, Traub & EJ Media Group Discovery Responses

Charles,

As a reminder we have not received Mr. Bollea's response to Daulerio Interrogatory No. 10 and RFP No. 54 (concerning his cell phone accounts), which we extended until today. Could you please advise me of their status? Thank you.

Seth

Seth D. Berlin



From: Seth Berlin
Sent: Tuesday, January 21, 2014 5:24 PM
To: 'Charles Harder'

Cc: Alia Smith; gthomas@tlolawfirm.com; Seth Berlin
Subject: RE: Bollea, Traub & EJ Media Group Discovery Responses

Charles,

We will agree to extend the time until February 4, 2013 for plaintiff, Ms. Traub and EJ Media to respond to the discovery requests and subpoenas, with two caveats. First, we will need plaintiff to respond by the end of the week to Interrogatory No. 10 and RFP No. 54 (both concerning his cell phone account(s)). Doing so should not be burdensome and will ensure that we have sufficient time to subpoena the relevant provider(s) before his deposition as needed.

Second, we do not want the delay to be used against us should outstanding discovery issues necessitate holding open Mr. Bollea's deposition beyond March 7. We do not think that is likely as a February 4 response date still allows ample time to resolve any discovery issues, but do not want to put ourselves in a worse position by extending you a professional courtesy.

Should you have any, questions please let me know. Thank you.

Seth

Seth D. Berlin



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From: Charles Harder [<mailto:charder@hmafirm.com>]
Sent: Tuesday, January 21, 2014 12:03 PM
To: Seth Berlin; Alia Smith; gthomas@tlolawfirm.com
Subject: Bollea, Traub & EJ Media Group Discovery Responses

Seth, Alia and Gregg:

Can you please give Mr. Bollea 15 additional days to provide you with responses to your outstanding discovery? According to my records, responses to the following discovery is outstanding (please let me know if there is more):

- Defendant A.J. Daulerio's Second Set of Interrogatories to Plaintiff
- Defendant Gawker Media, LLC's Second Request for Production of Documents to Plaintiff

Also, my office will be representing Elizabeth Rosenthal Traub and her company EJ Media Group LLC. Can you please give 15 additional days to respond to your subpoenas to those non-parties?

If the above requests are granted, then the new deadline for all responses would be (according to my calculations) **February 4, 2014**. Thank you in advance for your courtesy.

Sincerely,

Charles Harder



CHARLES J. HARDER

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