

EXHIBIT A



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May 2, 2014

VIA EMAIL AND U.S. MAIL

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Re: **Terry Gene Bollea v. Heather Clem, Gawker Media LLC, et al**
Circuit Court of the Sixth Judicial Council in and for Pinellas County, Florida
Case Number 12012447CI-011

Dear Seth:

This letter responds to yours of May 1, 2014. As an initial matter, my office does not have a copy of the April 23, 2014 Order referenced in your letter, or a record of having received it, and it is not available on the Court's online docket. Can you please provide me a copy? Also, you submitted the proposed order without first letting me discuss with you the terms, particularly the timing of the production. The phone records for 2012, in particular, take longer than one week to locate and produce. As to each of your other points:

We are in the process of obtaining Mr. Bollea's telephone records for 2012 and, subject to and without waiving any objections, intend to provide you with those records, as well as a supplemental response to Daulerio Interrogatory No. 10. We hope to be able to provide you these materials by the end of next week (May 9). We appreciate your patience as we work diligently to gather the information.

We have already confirmed to you on numerous occasions that Mr. Bollea has produced all documents in his possession, custody and control that are responsive to Gawker's Request for Production No. 51. *See, e.g.*, Plaintiff's Exceptions to Discovery Magistrate's Recommendation Re: Gawker Media, LLC and A.J. Daulerio's Fifth Motion to Compel at n.2 ("Mr. Bollea has conducted a diligent search for responsive documents and, on March 5, 2014, produced documents Bates stamped BOLLEA 001060-67, consisting of an email with attachments regarding an October 2012 media tour, that Mr. Bollea voluntarily obtained from TNA Impact Wrestling. There are no further non-privileged, responsive documents in Mr. Bollea's possession, custody or control.").

Regarding Daulerio Interrogatory No. 9 and Gawker's Request for Production No. 52:

- a. We are in the process of preparing a supplemental response to Daulerio Interrogatory No. 9. The production Bates stamped BOLLEA 001068 through BOLLEA 001216 reflects all occasions that Mr. Bollea or his representatives recall having communications with the Federal Bureau of Investigation and U.S. Attorney's Office. We are conferring with Mr. Bollea's representatives regarding their communications, if any, with other law enforcement agencies, and intend to serve the supplemental response very soon once that information has been obtained.
- b. The discrepancy in the number of documents identified in the privilege log was the result of making duplicate entries, in some instances, for all emails included within a single email chain. Thus, the same email was logged multiple times. We apologize for any confusion this may have caused. We can confirm that all of the documents reflected on the privilege log were produced to you. Enclosed herewith is an Amended Privilege Log with the duplicate entries removed, and a redlined version highlighting the entries that were removed. The Amended Privilege Log includes a column identifying the Bates range for the documents for your convenience.
- c. We are looking into the issue of attachments referenced in your letter and will get back to you shortly on that topic. My office has produced everything in our possession, and if there are attachments that are responsive and non-privileged, we will produce those once we obtain them ourselves.
- d. We disagree with your contention that we did not have authorization to make the redactions to BOLLEA 001213 and BOLLEA 001214. *See* Bubba Clem Tr. (3/4/14) at 423:10-436:10.

Should you wish to discuss any of the foregoing responses, I am available via telephone next week. Please contact my office if you have any questions or concerns.

Very truly yours,



CHARLES J. HARDER Of
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Enclosures

cc: Barry A. Cohen, Esq. (via email)
Michael W. Gaines, Esq. (via email)
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