

# EXHIBIT 3

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May 1, 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:

I write to address plaintiff's numerous violations of the Court's April 23, 2014 Order, which required plaintiff to provide various additional discovery to us by yesterday.

First, plaintiff was ordered to serve a supplemental interrogatory response to Daulerio Interrogatory No. 10 and to produce all documents responsive to Gawker's Request for Production No. 54, both of which concern plaintiff's telephone records. He has not done so.

Second, plaintiff was ordered to produce all documents responsive to Gawker's Request for Production No. 51, concerning his media appearances. Save for one document produced just prior to plaintiff's deposition, he has not done so.

Third, plaintiff was ordered to serve a supplemental interrogatory response to Daulerio Interrogatory No. 9 and to produce all documents responsive to Gawker's Request for Production No. 52, concerning his communications related to any investigations by law enforcement agencies or officials, including the FBI. Plaintiff has failed to comply with this aspect of the April 23 Order in a number of respects:

- a. Plaintiff failed to serve a supplemental interrogatory response as ordered;
- b. Plaintiff identified 162 documents on his privilege log, but then served only 149 pages of documents;
- c. Plaintiff omitted from his production attachments to a number of documents, including without limitation attachments specifically referenced in emails dated 11/6/12, 11/26/12, 11/30/12, 12/4/12, 12/5/12, 12/10/12 (two different emails on that date each with separate attachments), 12/12/12 and 9/13/13;

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- d. Plaintiff redacted certain documents without any authorization for doing so. *See, e.g.*, Bollea 001213-001214. Indeed, despite substantial motions practice concerning these requests before both Judge Case and Judge Campbell, plaintiff did not even *raise* a perceived need to redact documents let alone *secure an order* permitting him to do so. Rather, the April 23 Order expressly orders plaintiff to provide “*all* of the discovery requested,” including “*full and complete* responses” to the document requests at issue.

We hereby demand that plaintiff immediately comply with the Court’s April 23 Order by providing full and complete interrogatory responses and production of documents as directed. We reserve all rights in connection with plaintiff’s violations of the Court’s Order, including without limitation the right to raise additional concerns as our review continues.

Should you wish to discuss any aspect of the above, please do not hesitate to contact me.

Sincerely,

LEVINE SULLIVAN KOCH & SCHULZ, LLP

By: 

Seth D. Berlin

cc: Other counsel of record