

EXHIBIT 2



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May 7, 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

CONFIDENTIAL—PURSUANT TO PROTECTIVE ORDER

Dear Counsel:

This letter is written in response to your letter dated May 6, 2014 relating to the ongoing discovery issues. We respond as follows:

1. We are still gathering and preparing the telephone records for production.
2. We have repeatedly made inquiries with respect to media appearance documents, and believe that there are no other such documents in our client's possession, custody, or control. However, in light of your letter, we are once again making a diligent search and reasonable inquiry with respect to this issue, and will let you know if any additional documents are located.
3. We are in the process of preparing a supplemental interrogatory response that will cover Mr. Bollea's, and his representatives', recollection of oral communications relating to the law enforcement investigations, and will serve this response when it is completed and reviewed.
4. We are currently gathering the e-mail attachments to the communications related to the FBI investigation and are preparing them for production.

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5. With respect to the redactions of certain race-related terms from the FBI documents, as well as the documents produced by Burton and Buchwald, it is our understanding that Judge Case ruled that such language is not relevant or discoverable in this case. If Mr. Bollea used any such language, it would have no relevance in this matter even under the broadest conception of relevance. It has nothing to do with the sexual encounters between Mr. Bollea and Ms. Clem, nothing to do with whether Mr. Bollea suffered damages, nothing to do with whether the sex video as reported by Gawker was newsworthy or whether Gawker had a First Amendment right to publish it, and nothing to do with whether Mr. Bollea consented to or knew about the recording. In addition, it is highly prejudicial and even if it were found to have some potential relevance (which has yet to be shown), the material clearly would be inadmissible in light of its severely prejudicial nature. Fla. Stat. § 90.403. Finally, this material is not reasonably likely to lead to the discovery of any admissible evidence.

Thus, if Gawker does not withdraw its demand for this material, Mr. Bollea will move for a protective order precluding discovery of any alleged usage of race-related terms by Mr. Bollea and ordering appropriate redactions of this material from documents disclosed in discovery. Because of the sensitive nature of this issue, Mr. Bollea intends to make this motion under seal and this letter is hereby designated as "CONFIDENTIAL" under the terms of the current protective order in this litigation.

If you wish to discuss any of these matters, please call or e-mail me.

Very truly yours,



CHARLES J. HARDER Of
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cc: Barry A. Cohen, Esq. (via email)
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