

# EXHIBIT 31



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May 23, 2014

**VIA EMAIL AND U.S. MAIL**

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**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 Counsel:

This letter responds to your letter dated May 22, 2014 with respect to the April 23, 2014 discovery order. As is explained more fully below, and in the several letters that I have sent you on this topic in the last three weeks, Plaintiff is not “delaying” or “defying” the Court’s discovery order, as you continue to claim without justification. On the contrary, Plaintiff is complying with it. Plaintiff has conducted a diligent search for responsive documents and communications, has produced all such material in his possession, and has responded to each of your letters and issues promptly, including providing additional information as available. I respond to your specific points in order.

**1. Cell phone information.** As to your first point, enclosed is Plaintiff’s Second Supplemental Response to Daulerio Interrogatory 10. As to your second point, regardless of what AT&T has told you, we have requested the telephone logs from Mr. Bollea’s service providers, and have not yet received them. We will produce them when we receive them.

**2. Landline telephone information and records.** Plaintiff’s full telephone numbers and account numbers are provided in the enclosed Second Supplemental Response to Daulerio Interrogatory 10, designated as “CONFIDENTIAL—ATTORNEYS’ EYES ONLY.” As for your complaint about allegedly missing pages, all responsive pages in Plaintiff’s possession were included. Other pages of the bills concern cable television subscriptions, which have nothing to do with telephone service or Gawker’s document demands.

**3. Records concerning media appearances.** Mr. Bollea has searched for and produced all writings in any form that are responsive to this request, and also has made inquiries of all agents or representatives who would be reasonably likely to have this information, and has produced all responsive documents.

**4. Documents referring or relating to communications with law enforcement.** Concurrently herewith, Mr. Bollea is producing four additional pages Bates stamped BOLLEA 001388 to BOLLEA 001391. With this production, Mr. Bollea has searched for and produced all responsive communications with law enforcement within his possession, custody, or control, including attachments. Additionally, Plaintiff and his counsel did not take notes during any of the conversations with law enforcement.

**5. Second supplemental response to Daulerio Interrogatory No. 9.** Your contention that Plaintiff “has not provided ‘full and complete’ responses to Daulerio Interrogatory No. 9” is wrong. The communications at issue occurred two years ago, memories have faded, and we have reviewed the records you refer to in your letter. We also have produced all responsive documents within Plaintiff’s possession, custody, and control with respect to this subject area. Thus, where communications were memorialized in writing, you have them, and where oral communications occurred, you have the best recollection based on the records that we have available. Nothing more is required.

Finally, we are in the process of obtaining a verification from our client for the discovery responses and will provide it to you when we receive it.

If you wish to discuss any of these matters further, please call me.

Very truly yours,



CHARLES J. HARDER Of  
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cc: Douglas E. Mirell, Esq. (via email)  
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