

Exhibit 2



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June 11, 2015

VIA ELECTRONIC MAIL AND HAND DELIVERY

The Honorable Pamela A.M. Campbell
Sixth Judicial Circuit
St. Petersburg Judicial Building
545 First Avenue N., Room 300
St. Petersburg, FL 33701

Re: *Terry Gene Bollea v. Clem, Gawker Media, LLC, et al.*
Case No.: 12012447-CI-011

Dear Judge Campbell:

I write on behalf of Gawker Media, LLC, Nick Denton and A.J. Daulerio (the “Publisher Defendants”) to respond to the letter from plaintiff’s counsel dated June 10, 2015.

With his letter yesterday afternoon, plaintiff’s counsel delivered papers filed over the past three days in the Court of Appeal. So that you have a complete set, attached is our reply filed this morning. That brief explains why the description of the law set forth in plaintiff’s briefs, as well as his letter to Your Honor, is wrong. It also explains why plaintiff’s request – that the parties should be required to continue to prepare for trial and he will decide in his sole discretion at some future point whether Kinja will be dismissed and we are then supposed to proceed – is both fundamentally unfair and, more to the point, violates both Rule 1.440 and the DCA’s May 7 Ruling.

In addition, plaintiff’s letter misconstrues our earlier letter as requesting a continuance. We made no such request, nor is one required. The DCA *quashed* both the order setting a trial date and the order severing Kinja for trial; no pre-trial/trial order has been reissued, nor could it be until Kinja is dismissed *and* the DCA returns jurisdiction to the Circuit Court; and even if both of those things occurred now, no trial date could be set for July 6 without violating Rule 1.440. We did not request Your Honor to address these issues because the Court has no jurisdiction to do so and, in any event, they were unambiguously adjudicated by the DCA in its May 7 Ruling and are mandated by Rule 1.440 which was at the heart of the writ proceedings that led to that ruling in the first place. Our request was far more limited: with no schedule in



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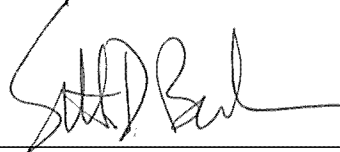
place, we simply requested that, once jurisdiction over the issue is returned to Your Honor from the DCA and once Kinja is either dismissed or has answered, the Court then schedule a Case Management Conference to set a new trial date and pre-trial schedule. The Publisher Defendants continue to believe it is unfair to expect the parties to continue to prepare for trial on July 6 when there is no trial order in place and no new order can be put in place for that date.

Should Your Honor have any questions about the foregoing, or wish to discuss the matter, we would of course be pleased to participate in a telephone conference with the Court and counsel at your convenience.

As always, thank you for your time and attention to this matter.

Respectfully submitted,

LEVINE SULLIVAN KOCH & SCHULZ, LLP

By: 

Seth D. Berlin

Attachment

cc: All counsel of record (by electronic mail)