

# EXHIBIT 25

to the

**JOINT OPPOSITION OF THE GAWKER DEFENDANTS AND THEIR  
COUNSEL TO PLAINTIFF'S EMERGENCY MOTION TO CONDUCT  
DISCOVERY CONCERNING POTENTIAL VIOLATION OF  
PROTECTIVE ORDER, TO COMPEL TURNOVER OF CONFIDENTIAL  
DISCOVERY MATERIALS AND FOR ORDER TO SHOW CAUSE**

July 22, 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**  
**Review of DVDs Produced by FBI**

Dear Judge Campbell:

As you know, I serve as counsel for Gawker Media, LLC, Nick Denton and A.J. Daulerio. I write concerning the reprocessed DVDs produced by the FBI to Your Honor on Thursday, July 16, 2015, and in response to the correspondence that plaintiff's counsel sent to Your Honor earlier today (see attached).

Following Judge Bucklew's order directing the FBI to advise Her Honor whether a "second, more accurate and complete production is required," counsel for the FBI informed the federal court that the reprocessed DVDs correct issues with two of the DVDs provided to Your Honor on June 29, 2015 and reviewed by counsel for the parties on June 30, 2015. As the FBI has explained in its filings in the federal FOIA litigation, "one of the FBI's DVDs was corrupt and contained video footage that was little over one minute" and the other "video appeared to have audio that, in part, was not synchronized with the video footage."

Now that Your Honor has received the reprocessed DVDs and has had an opportunity to review them, we respectfully request that counsel for the parties be permitted to review the two reprocessed DVDs, just as the parties' counsel jointly reviewed the DVDs previously produced by the FBI. We are available to review the DVDs before or after the upcoming July 30 hearing, either on the afternoon of July 29 or following the hearing on July 30.

Today, plaintiff's counsel has requested that the DVDs be transferred to Judge Case. We believe that is both unnecessary and inefficient. The protocol was entered while the case was in active discovery, which was overseen by Judge Case. In light of the fact that Your Honor

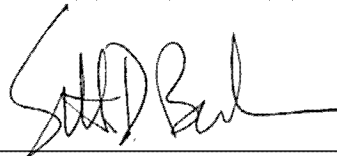
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July 22, 2015  
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reviewed the first set of DVDs and has custody of the reprocessed DVDs, we believe that it would be appropriate for you to continue to retain possession of all of the DVDs and oversee issues relating to them, including because they bear on evidentiary and other issues relating to trial. Indeed, for that reason, the parties previously agreed, and this Court directed, that the DVDs be provided directly to Your Honor. We would be happy to discuss this and any other issue relating to the DVDs at the July 30 hearing.

Thank you for your consideration. And, as always, thank you for your time and attention to this matter.

Sincerely,

LEVINE SULLIVAN KOCH & SCHULZ, LLP

By: 

Seth D. Berlin

cc: All counsel or record (via electronic mail)