

Exhibit 7



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September 11, 2015

VIA EMAIL

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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 Seth:

This letter concerns the financial worth discovery conducted by Mr. Bollea pursuant to the Court's July 20, 2015 Order compelling production of documents. Such discovery remains incomplete, and we write in the hopes of informally resolving the issue and avoiding a motion.

Missing trust documents. Gawker and Mr. Denton are in violation of the Court's July 20, 2015 Order requiring that they turn over all documents relating to his family trust which would show the extent of his control over that trust, including trust documents, documents that show the grantor, trustees, beneficiaries, and terms of the trust, shareholder voting rights, and documents evidencing the consideration originally paid for the shares, date of creation of the trust, and date shares in GMGI belonging to Mr. Denton were deposited into the trust. All of these documents were clearly requested in Mr. Bollea's motion to compel, and Mr. Bollea's motion was granted in full. However, no such documents were produced and Mr. Denton contends in his Affidavit that he "do[es] not have the documents memorializing the trust" The requested documents, however, go beyond those that merely memorialize the trust. Moreover, any documents within the possession of Mr. Denton's counsel (who presumably do possess copies of a trust created at the behest of Mr. Denton), or anyone else who can readily make the documents available to Mr. Denton upon his request, are clearly within Mr. Denton's custody and control and should be produced. Without these documents, it is impossible to fully test the veracity of Mr. Denton's claim that he does not control the shares in the trust and thus that his shares in GMGI (by far his largest asset) are not subject to a control premium.

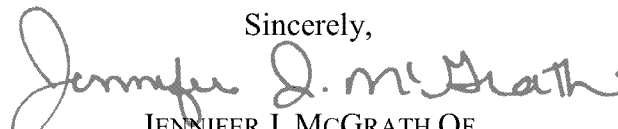
Missing account statements. Mr. Denton's 2012 tax return shows a London CitiGold account, number 0000499375, with a maximum value during the year of over \$100,000. No statements from this account were produced, in violation of the court's July 20 order. Please produce statements from this account consistent with the terms of the Court's order (i.e., for December 2011, December 2012, December 2013, December 2014, and May 2015).

Additionally, in violation of the Court's July 20 order, the production is missing statements for December 2011, 2012, and 2013 for CitiGold account number 0080708432, and December 2011, 2012, 2013, and 2014 for CitiGold account number 0083411244, both of which are listed on the 2012 tax return. Please produce these statements as required by the Court's order.

Transfer pricing studies. Gawker has previously denied the existence of any transfer pricing studies, in its response to the Fifth Set of Document Demands (e.g., Response to Request 140: "subject to Gawker's understanding of the term 'transfer pricing studies', Gawker states that it has no non-privileged documents responsive to this Request"). However, the Gawker-Kinja license agreement [page GAWKER28910_C] recites the existence of such a study dated December 12, 2011, which allegedly formed the basis of the compensation paid to Kinja pursuant to the license agreement. This document should have been produced in response to numerous document demands served during merits discovery, as well as during net worth discovery. Please produce it forthwith.

Latest statement for each account. Mr. Bollea wishes to establish Mr. Denton's net worth as close to the time as trial as possible. The Court's order attempted to deal with this by requiring production of the latest statement (at the time May 2015) from each account held by Mr. Denton. However, with the trial continuance, Mr. Bollea now requires the latest account statement from each account so as to update the valuation. Please produce such statements.

Please provide written confirmation no later than the close of business on September 15, 2015 that these documents will be produced forthwith. Otherwise, Mr. Bollea will be forced to again move to compel and to seek sanctions for Gawker's noncompliance with the July 20 court order. If you have any questions, please contact me.

Sincerely,

JENNIFER J. MCGRATH OF
HARDER MIRELL & ABRAMS LLP

cc: Charles J. Harder, Esq.
Ken Turkel, Esq.
Shane Vogt, Esq.

September 17, 2015

VIA ELECTRONIC MAIL

Jennifer J. McGrath, Esq.
Harder Mirell & Abrams LLP
132 S. Rodeo Drive, Suite 301
Beverly Hills, CA 90212

Re: *Bollea v. Clem, Gawker Media, LLC, et al.*,
No. 12012447-CI-011 (Fla. Cir. Ct.)
Objections to Financial Worth Discovery

Dear Jennifer:

I write in response to your letter sent on Friday evening, September 11, 2015 regarding financial worth discovery.

Before turning to the substance of your letter, I feel constrained to renew my objection to your firm's repeated practice of waiting until Friday evenings or Jewish holidays to file motions or send correspondence demanding an immediate response. In this instance, your letter was sent after hours on a Friday evening and demanded a response within two business days, despite the fact that those two days were Rosh Hashanah (the first of which is also a court holiday). This was also unnecessary: your letter relates to discovery responses served some six weeks ago in connection with a trial that is not for six months.

Turning to the substance of your letter:

Trust Documents. As Mr. Denton explained, under oath at his deposition and in a sworn affidavit, neither Gawker nor he has possession, custody or control of the trust documents you seek. Neither is a party to the trust agreement – neither is the grantor of the shares in the trust, the beneficiary of the trust, or the trustee. I also feel constrained to note that your letter demands all manner of documents that were not included in either the document request at issue or the Court's order, although that is largely academic in light of the foregoing.

Mr. Denton's Account Statements. Mr. Denton has provided all the required account records that he has or has access to. As both he and we have explained, the few additional statements you seek relate to long-closed accounts for which he no longer has copies or access to obtain copies. Your continued insistence that he somehow locate years-old bank statements for long-dormant accounts is entirely unreasonable. Mr. Denton has readily conceded that he is

Jennifer J. McGrath, Esq.
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worth tens of millions of dollars, so continuing to seek records for closed accounts that once held much more modest sums that are not material to his current financial worth serves no valid purpose in connection with presenting plaintiff's case on that issue.

Transfer Pricing Studies. Gawker again confirms its response to RFP No. 140 that it has no non-privileged documents responsive to this Request.

Latest Statement for Each Account. Mr. Denton will provide, by February 15, 2016, the account statements for his active accounts for the period ending January 30, 2016.

Although you have repeatedly declined our invitations to discuss such matters informally, I am willing to meet and confer about the above at a mutually-convenient time. In that regard, and consistent with my comments above, please note that I will be out of the office on Tuesday and Wednesday, September 22 and 23 in observance of Yom Kippur. Thank you.

Sincerely,

LEVINE SULLIVAN KOCH & SCHULZ, LLP

By: 

Seth D. Berlin

cc: Other counsel of record



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September 17, 2015

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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 Seth:

I write in response to your letter dated September 17, 2015.

First, we reject your claim that we are imposing unreasonable time periods to respond to correspondence. Presumably, you were already aware of Gawker's positions with respect to all the matters raised in my letter; therefore, it was certainly reasonable to seek a response within four days of receipt of my letter. (In any event, if you needed a bit of extra time to respond due to your being out of the office, you could have easily requested it as a matter of professional courtesy.)

Second, the fact that the trial date is in March does not mean that discovery must be delayed and pushed up against the trial date. In fact, this discovery was first ordered in May, and it is now September and Mr. Bollea still does not have relevant documents on the net worth issue.

Third, on the merits of the enumerated discovery issues, we respond as follows:

Trust Documents. Gawker and Denton are relying on an over-narrow definition of "control". We highly doubt that Denton cannot obtain documents relating to his family trust, a trust that has a substantial interest in a multi-million dollar corporation which comprises the bulk of his net worth. Defendants have asserted dubiously narrow definitions of "control" in the past in this litigation (with respect to Kinja documents), and the Court rejected them. The Court has already ordered the production of these documents over Gawker's and Denton's objections, and unless your clients agree to comply with this order, we intend to obtain an order that specifically

September 17, 2015

S. Berlin

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requires production of documents that Gawker or Denton can obtain from the trust or the trust's lawyers.

Further, the language in my letter regarding the scope of the request is taken directly from Mr. Bollea's motion papers; the Court granted Mr. Bollea's motion on this issue in its July 20 order.

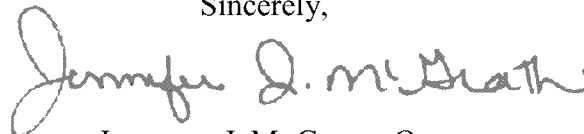
Mr. Denton's Account Statements. If Mr. Denton will provide a verified statement under oath that the accounts at issue no longer exist or have zero balances, we will not pursue our motion to compel in reliance on that representation.

Transfer Pricing Studies. Your response on this issue is completely at odds with the relevant documentation. The agreement between Gawker and Kinja specifically recites that such a study was done, which it specifically identifies, and further recites that the study was relied on in determining the terms of the agreement. Thus, your claim that no such transfer pricing study exists would mean that Gawker and Kinja made a false representation as a part of a document that resulted in the shipping of millions of dollars every year out of Gawker's accounts and into Hungary where it can be secreted from creditors and taxation authorities. In short, your claim strains credibility, but if it is in fact true, it has serious implications for whether the transfers to Kinja were fraudulent and those funds should be considered a part of Gawker's net worth (as well as for proceedings supplementary which may occur to recover those moneys after a judgment is entered). If, in fact, a transfer pricing study was done as Gawker and Kinja stated in their agreement, please reconsider your position and produce it immediately.

Latest Statement for Each Account. In reliance on your representation that Mr. Denton will provide the statements for all active accounts for the period ending January 30, 2016, no later than February 15, 2016, Mr. Bollea will not move to compel production of these statements at this time.

If you wish to discuss any of these matters, please write or call me no later than the close of business September 21, 2015. If we do not resolve these matters, we will be forced to move to compel and to seek monetary sanctions.

Sincerely,



JENNIFER J. MCGRATH OF
HARDER MIRELL & ABRAMS LLP

cc: Ken Turkel, Esq. (via email)
Shane Vogt, Esq. (via email)
David Houston, Esq. (via email)

September 21, 2015

VIA ELECTRONIC MAIL

Jennifer J. McGrath, Esq.
Harder Mirell & Abrams LLP
132 S. Rodeo Drive, Suite 301
Beverly Hills, CA 90212

Re: *Bollea v. Clem, Gawker Media, LLC, et al.*,
No. 12012447-CI-011 (Fla. Cir. Ct.)
Objections to Financial Worth Discovery

Dear Jennifer:

I write in response to your letter sent last Thursday night. To respond to your substantive questions:

1. **Transfer pricing study.** Gawker has never contended that there was no such study. Rather, it has explained that it has no *non-privileged* responsive documents. The study, which was prepared by the law firm Mayer Brown, LLP, was included on the privilege log produced by Gawker on March 28, 2014, and Mr. Kidder referenced it, as a privileged document, at his second deposition (April 14, 2015) at pages 144-151.
2. **Trust documents.** As we and Mr. Denton have explained repeatedly: Mr. Denton is not the grantor of the trust (his father transferred the shares into the trust), he is not the beneficiary of the trust (his niece and nephews are), and he is not the trustee (his sister is). Mr. Denton has no control over the trust, nor does he possess or control the trust documents. *See, e.g.*, Denton Dep. Tr. (June 16, 2015) at 152:9 – 165:9. Although we think it would be illogical to argue that Mr. Denton’s net worth includes shares of GMGI that are in a trust with shares granted by his father, controlled by his sister, and benefiting his niece and nephews, plaintiff remains free to make this non-sensical argument to the jury at trial, if the Court permits it.
3. **Bank accounts.** We believe that Mr. Denton has already testified that the accounts you reference are closed or dormant and have zero balance. *See, e.g.*, Denton Dep. Tr. (June 16, 2015) at 30:15 – 31:3; 37:10-18; 49:21 – 50:14; 104:5-8. Nevertheless, in an effort to avoid further debate or litigation over this non-issue, he will provide a further affidavit confirming this fact.

Jennifer J. McGrath, Esq.

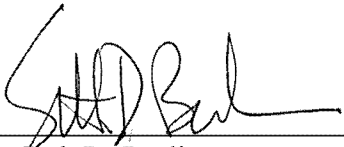
September 21, 2015

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As you know, I will be out of the office tomorrow and Wednesday in observance of Yom Kippur. But I should generally be available on Thursday or Friday to discuss the foregoing. Thank you.

Sincerely,

LEVINE SULLIVAN KOCH & SCHULZ, LLP

By: 
Seth D. Berlin

cc: Other counsel of record