

# EXHIBIT 6

to the

**GAWKER DEFENDANTS' MOTION TO COMPEL  
PLAINTIFF TO PRODUCE IMPROPERLY WITHHELD DOCUMENTS**

Sweeney, Sara [redacted]

**From:** Shearn, Jason R. [redacted]  
**Sent:** Friday, October 19, 2012 3:18 PM  
**To:** Sweeney, Sara [redacted]  
**Subject:** FW: 10.19.12 Bubba Clem Matter

b6 -1, 3  
b7C -1, 3

SA Jason R. Shearn  
Tampa Division, Pinellas RA  
Office [redacted]

**From:** Kristy Rosser [redacted]  
**Sent:** Friday, October 19, 2012 3:01 PM  
**To:** Shearn, Jason R.  
**Subject:** 10.19.12 Bubba Clem Matter

b6 -4  
b7C -4

Jason:

The case seems to take a number of twists and turns and I wanted you to be aware of the following. It seems as though Bubba and Heather made quite a habit of taping folks.

As I understand it, there are potentially tapes on [redacted] as well as [redacted]. The troubling matter is there may also be tape on [redacted]. This [redacted] has been a good friend of Bubba's for a number of years, has stayed with Bubba at his home and may have taken advantage of the opportunity and invitation from Bubba to sleep with his wife.

b6 -4  
b7C -4

As is apparent, Heather would record these people and in fact, according to Mike Walthers of TMZ, has on one of the tapes said "Oh I better turn this recorder on, if I don't I am going to be in big trouble". It seems she was operating at Bubba's direction for the purpose of creating what might be a rather valuable library for future use.

I am not sure whether Davidson is representing them, although I am beginning to think so just simply by the fact someone is showing snippets to Mike Walthers of TMZ in order to continue generating interest.

Heather's statement on the tape Mike Walthers viewed is very simple. She is doing this at someone's direction for a specific purpose and it certainly concerns more than Terry Bollea.

Did you get a chance to talk to the State's Attorney? The more I check into the idea of prosecution on a State level for the production of the tape, the more I am simply amazed that the states attorney's office has no interest. The statute of limitations is not based simply upon the date of production, but as we have learned is also tied in with dissemination or attempted discrimination.

Please let me know if you did have a conversation. I know you don't want two things going on at once, but I am curious as to what their position may be.

Sincerely,  
David R. Houston  
/kc

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