

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA

TERRY GENE BOLLEA professionally
known as HULK HOGAN,

Plaintiff,

Case No.: 12012447-CI-011

vs.

GAWKER MEDIA,
LLC aka GAWKER MEDIA; et al.,

Defendants.

_____ /

**GAWKER DEFENDANTS' NOTICE OF FILING
OF CORRESPONDENCE TO COURT**

Defendants Gawker Media, LLC, Nick Denton, and A.J. Daulerio, by and through their undersigned counsel, hereby file this Notice attaching correspondence to the Court, dated this same day, the concerning their Motion for an Order Declaring that Plaintiff Has Improperly Designated Certain Discovery Materials as "Attorneys' Eyes Only."

December 28, 2015

Respectfully submitted,

THOMAS & LOCICERO PL

By: Gregg D. Thomas

Gregg D. Thomas

Florida Bar No.: 223913

Rachel E. Fugate

Florida Bar No.: 0144029

601 South Boulevard P.O. Box 2602 (33601)

Tampa, FL 33606

Telephone: (813) 984-3060

Facsimile: (813) 984-3070

gthomas@tlolawfirm.com

rfugate@tlolawfirm.com

and

Seth D. Berlin
Pro Hac Vice Number: 103440
Michael D. Sullivan
Pro Hac Vice Number: 53347
Michael Berry
Pro Hac Vice Number: 108191
Alia L. Smith
Pro Hac Vice Number: 104249
Paul J. Safier
Pro Hac Vice Number: 103437
LEVINE SULLIVAN KOCH & SCHULZ, LLP
1899 L Street, NW, Suite 200
Washington, DC 20036
Telephone: (202) 508-1122
Facsimile: (202) 861-9888
sberlin@lskslaw.com
msullivan@lskslaw.com
mberry@lskslaw.com
asmith@lskslaw.com
psafier@lskslaw.com

*Attorneys for Defendants Gawker Media, LLC, Nick
Denton, and A.J. Daulerio*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 28th day of December, 2015, I caused a true and correct copy of the foregoing to be served via the Florida Courts' E-Filing Portal on the following counsel of record:

Kenneth G. Turkel, Esq.
kturkel@BajoCuva.com
Shane B. Vogt, Esq.
shane.vogt@BajoCuva.com
Bajo Cuva Cohen & Turkel, P.A.
100 N. Tampa Street, Suite 1900
Tampa, FL 33602
Tel: (813) 443-2199
Fax: (813) 443-2193

Attorneys for Plaintiff

David Houston, Esq.
Law Office of David Houston
dhouston@houstonatlaw.com
432 Court Street
Reno, NV 89501
Tel: (775) 786-4188

Attorney for Plaintiff

Timothy J. Conner
Holland & Knight LLP
50 North Laura Street, Suite 3900
Jacksonville, FL 32202
timothy.conner@hkllaw.com

Charles D. Tobin
Holland & Knight LLP
800 17th Street N.W., Suite 1100
Washington, D.C. 20006
charles.tobin@hkllaw.com

*Attorneys for Intervenors First Look
Media, Inc., WFTS-TV and WPTV-TV,
Scripps Media, Inc., WFTX-TV, Journal
Broadcast Group, Vox Media, Inc., Cable
News Network, Inc., BuzzFeed and The
Associated Press*

Charles J. Harder, Esq.
charder@HMAfirm.com
Jennifer McGrath, Esq.
jmcgrath@hmafirma.com
Harder Mirell & Abrams LLP
132 South Rodeo Drive, Suite 301
Beverly Hills, CA 90212-2406
Tel: (424) 203-1600
Fax: (424) 203-1601

Attorneys for Plaintiff

Allison M. Steele
Rahdert, Steele, Reynolds & Driscoll, P.L.
535 Central Avenue
St. Petersburg, FL 33701
amnestee@aol.com
asteel@rahdertlaw.com
ncampbell@rahdertlaw.com

Attorney for Intervenor Times Publ'g Co.

/s/ Gregg D. Thomas
Attorney

EXHIBIT

December 28, 2015

VIA 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. Gawker Media, LLC, et al.*
Case No.: 12012447-CI-011

Dear Judge Campbell:

I write concerning the Motion for an Order Declaring that Plaintiff Has Improperly Designated Certain Discovery Materials as “Attorneys’ Eyes Only,” which we filed on behalf of defendants Gawker Media, LLC, Nick Denton, and A.J. Daulerio. That motion was filed on August 20, 2015, and remains pending.

As Your Honor is aware, in the ongoing federal litigation concerning our Freedom of Information Act request, over the past two months the Honorable Susan C. Bucklew has ordered the FBI and Executive Office of United States Attorneys (“EOUSA”) to produce additional records and versions of records that they previously produced with some or all of the redactions removed. In recent weeks, the FBI and EOUSA have responded to those orders by producing an array of records. Most recently, on November 30 and December 2, 2015, the FBI produced hundreds of new versions of previously produced records. Plaintiff Terry Bollea has designated all of these records as “Highly Confidential – Attorney’s Eyes Only.”

To facilitate Your Honor’s consideration of the pending Motion concerning plaintiff’s confidentiality designations, we have prepared the three enclosed binders for *in camera* review. These binders contain a complete set of all of the records produced by the FBI and EOUSA.

Nearly all of the records in the enclosed binders have been provided to Your Honor previously in the redacted form that the FBI provided them to us. Now that the government has removed many of the redactions, we are able to provide Your Honor with an unredacted set of records. To assist in Your Honor’s review, we have included on the bottom left-hand corner of each newly unredacted document a notation stating the date on which the government produced

that version of the document to us. Documents with no date footer were produced in the government's original July 2015 productions.

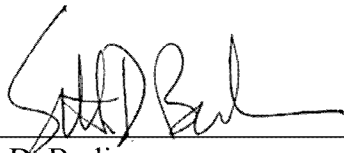
Now that it appears that the FBI and EOUSA's document production is complete, we respectfully request that Your Honor rule promptly on the pending Motion so that we have the benefit of your ruling as we prepare for the upcoming trial.

Also, please note, that the pending Motion also relates to thousands of pages of documents produced by plaintiff, not the federal government. Those documents were provided for Your Honor *in camera* inspection in September.

Thank you for your consideration.

Respectfully,

LEVINE SULLIVAN KOCH & SCHULZ, LLP

By: 
Seth D. Berlin

Enclosures

cc: Kenneth G. Turkel (via hand-delivery, with enclosures)