

## EXHIBIT 2

Bajo | Cuva | Cohen | Turkel  
ATTORNEYS AT LAW

February 9, 2016

Via Hand Delivery

The Honorable Pamela A.M. Campbell  
Civil Division, Section 11  
St. Petersburg Judicial Building  
545 1st Avenue North, Room 300  
St. Petersburg, Florida 33701

Re: *Bollea v. Heather Clem et al.*  
Case No. 12012447-CI-011

Judge Campbell:

In connection with the pre-trial conference/hearing scheduled for February 17, 2016 at 9:00 a.m., enclosed are courtesy copies of binders containing the following motions with supporting materials:

- 1) Plaintiff Terry Bollea's Motion in Limine No. 23 to Exclude, or Alternatively, Motion to Strike, Arguments or Evidence Submitted to Show Fraud on the Court;
- 2) Plaintiff Terry Bollea's Motion in Limine No. 24 to Exclude Argument or Evidence of Illegally Recorded Audio of Terry Bollea and any Evidence Derived Therefrom;
- 3) Plaintiff's Emergency Motion to Strike and Remove All Materials from the Record that Disclose or Are Derived from Surreptitiously Recorded Audio;
- 4) Plaintiff's Motion to Modify, Supplement and/or Amend Orders Sealing Surreptitious Audio and Evidence Derived Therefrom; and
- 5) Case law and statutes supporting Mr. Bollea's enclosed motions.

As you can see from the motions, Mr. Bollea believes that Florida's Security of Communications Act (the "Act") and Article 1, Section 12 of Florida's Constitution require any evidence of or derived from Mr. Bollea's surreptitiously recorded conversations to be excluded as evidence at trial and to be stricken and removed from the court file, with the exception of the video and article posted on Gawker.com on October 4, 2012 at issue in this lawsuit. Alternatively, Mr. Bollea believes the Act and Florida Constitution require, and therefore

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provide an additional basis for, the sealing of such materials in the court file. The recent conclusion of the FOIA litigation and viewing of the corrected and unredacted DVDs by the Court and counsel for the parties provided the final predicate necessary for the Court to determine that Mr. Bollea was secretly recorded in violation of Florida law.

We respectfully request that Mr. Bollea's enclosed motions be taken up first at the February 17 Pre-Trial Conference, because the Court's rulings on these motions may obviate the need to argue numerous other motions at the Pre-Trial Conference (*i.e.*, Motions in Limine regarding FOIA records and Mr. Bollea's secretly recorded conversations). The Court's ruling on the Motion to Strike and Motion to Modify also may impact a pending certiorari petition filed by the Intervening Media Companies in which they seek to unseal a number of court filings addressed in these motions. If these materials are stricken, it may render all or a majority of the issues raised in that appeal moot. Mr. Bollea filed a Status Report notifying the Second DCA about the filing on the Motion to Modify and Motion to Strike, a copy of which is enclosed.

As always, Your Honor's attention to these materials is greatly appreciated.

Respectfully,

BAJO | CUVA | COHEN | TURKEL

A handwritten signature in black ink, appearing to read 'K. G. Turkel', with a stylized flourish extending from the end.

Kenneth G. Turkel

Enclosures

cc: Counsel of record via email