

EXHIBIT B

*(Plaintiff's Objection and Motion to Exclude Deposition Testimony of
MindGeek Corporate Representative and Exhibits at Trial)*

From: "Jason A. Fischer" <jason@markbryn.com>
Date: February 11, 2016 at 3:04:13 PM EST
To: "Shane B. Vogt" <Shane.Vogt@bajocuva.com>
Cc: "Matthew Blackett (MBlackett@hmafirm.com)" <MBlackett@hmafirm.com>, Lisa Meriwether <Lisa.Meriwether@bajocuva.com>
Subject: Re: Terry Bollea/Gawker; MinGeek Deposition

Shane,

This will confirm my receipt of your email. I will await your email with the list of additional topics. I will need to check with MindGeek to see whether they are willing to waive service of a new subpoena and, if not, whether they are willing to authorize our acceptance of service.

Best regards,

Jason A. Fischer
Bryn & Associates, P.A.
One Biscayne Tower, Suite 2680
Two South Biscayne Boulevard
Miami, Florida 33131
Office: 305.374.0501
Fax: 305.372.8068

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On Feb 11, 2016, at 2:47 PM, Shane B. Vogt <Shane.Vogt@bajocuva.com> wrote:

Jason:

It is nice to meet you. I am one of the lawyers representing Terry Bollea in the lawsuit involving Gawker. I will be participating in the deposition of the corporate representative of MindGeek on February 18, 2016.

We received a copy of the notice for the deposition, and would like to serve a cross-notice with a few additional topics. It is not a large list of topics. Primarily just some broader background issues and topics relating to some analytics. We will send you a copy of the Cross-Notice as soon as it is completed later today. If you have any issues or concerns over the topics, please let me know so that we can work them out.

Can you please let me know if your client will require an additional subpoena identifying these topics? If so, can you please let me know whether you can accept service of the same?

Thank you for your help.

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From: Lisa Meriwether
Sent: Thursday, February 11, 2016 4:33 PM
To: 'jason@markbryn.com'
Subject: FW: Terry Bollea/Gawker; MindGeek Deposition

Mr. Fischer –

Shane Vogt requested that I forward you the attached Cross-Notice of Taking Deposition.

Lisa

Bajo|Cuva|Cohen|Turkel
ATTORNEYS AT LAW

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813.443.2199 (office)
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Email: imeriwether@bajocuva.com

From: Shane B. Vogt
Sent: Thursday, February 11, 2016 3:20 PM
To: Jason A. Fischer
Cc: Matthew Blackett (MBlackett@hmfirma.com); Lisa Meriwether
Subject: Re: Terry Bollea/Gawker; MinGeek Deposition

Much appreciated.

Sent from my iPhone

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