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*Counsel to the Plan Administrator  
for the Debtors*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11
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Gawker Media LLC, <i>et al.</i> , <sup>1</sup>	:	Case No. 16-11700 (SMB)
	:	
Debtors.	:	(Jointly Administered)
	:	
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**NOTICE OF PRESENTMENT OF STIPULATION AND ORDER  
BETWEEN THE PLAN ADMINISTRATOR AND ALBERT JAMES  
DAULERIO REGARDING PROOFS OF CLAIM NOS. 293, 294 AND 295**

**PLEASE TAKE NOTICE** that Albert James Daulerio (“Mr. Daulerio”) filed Claim Nos. 293, 294, and 295 (collectively, the “Daulerio Claims”) in the chapter 11 cases filed by Gawker Media LLC (“Gawker Media”), Gawker Media Group, Inc. (“GMGI”), and Gawker Hungary Kft. (“Gawker Hungary” and together with Gawker Media and GMGI, the “Debtors”);

<sup>1</sup> The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary Kft. (f/k/a Kinja Kft.) (5056). Gawker Media LLC and Gawker Media Group, Inc.’s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Plan Administrator, 10 East 53rd Street, 33rd Floor, New York, NY 10022. Gawker Hungary Kft.’s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10022.

**PLEASE TAKE FURTHER NOTICE** that the Daulerio Claims allege claims for liability resulting from the Debtors' duty to defend and indemnify Mr. Daulerio in connection with the judgment entered on June 7, 2016 in the suit by Terry Gene Bollea ("Bollea") and the proceedings relating to additional pending and potential lawsuits by Bollea against Mr. Daulerio (collectively, the "Daulerio Claims");

**PLEASE TAKE FURTHER NOTICE** that on November 28, 2016, the Debtors filed the *Debtors' Omnibus Objection to Proofs of Claim Nos. 293, 294 and 295 Filed by Albert James Daulerio* [Docket No. 493] (the "Objection");

**PLEASE TAKE FURTHER NOTICE** that the parties have entered into the stipulation and order attached hereto as **Exhibit A** in respect of the Daulerio Claims and the Objection (the "Stipulation and Order");

**PLEASE TAKE FURTHER NOTICE** that, absent objections, the undersigned will present the Stipulation and Order for signature to the Court on **November 27, 2017 at 4:00 p.m.**; and

**PLEASE TAKE FURTHER NOTICE** that responses or objections to the Stipulation and Order, if any, shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, shall set forth the basis for the response or objection and the specific grounds therefore, and shall be filed with the Court electronically in accordance with General Order M-399 by registered users of the Court's case filing system (the User's Manual for the Electronic Case Filing System can be found at <http://www.nysb.uscourts.gov>, the official website for the Court), with a hard copy delivered directly to chambers and

served so as to be actually received no later than **November 21, 2017 at 4:00 p.m.** (prevailing Eastern Time), upon (i) the Plan Administrator for the Debtors, Attn: William D. Holden (profinvoices@gawker.com); (ii) counsel to the Plan Administrator for the Debtors, Ropes & Gray LLP, 1211 Avenue of the Americas, New York, NY 10036, Attn: Gregg M. Galardi (gregg.galardi@ropesgray.com); (iii) the Office of the United States Trustee for the Southern District of New York, 201 Varick Street, Suite 1006, New York, NY 10014, Attn: Greg Zipes & Susan Arbeit; (iv) counsel for the IRS, Andrew E. Krause, United States Attorney's Office Southern District of New York, 86 Chambers Street, 3rd Floor, New York, New York 10007; and (v) those persons who have formally appeared and requested service in these cases pursuant to Bankruptcy Rule 2002.

Dated: November 7, 2017  
New York, New York

/s/ Gregg M. Galardi  
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UNITED STATES BANKRUPTCY COURT  
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In re	:	Chapter 11
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Gawker Media LLC, <i>et al.</i> , <sup>1</sup>	:	Case No. 16-11700 (SMB)
	:	
Debtors.	:	(Jointly Administered)
	:	
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**STIPULATION AND ORDER BETWEEN THE PLAN ADMINISTRATOR AND ALBERT JAMES DAULERIO REGARDING PROOFS OF CLAIM NOS. 293, 294 AND 295**

The Plan Administrator for Gawker Media LLC (“Gawker Media”), Gawker Media Group, Inc. (“GMGI”), and Gawker Hungary Kft. (“Gawker Hungary” and together with Gawker Media and GMGI, the “Debtors”), in the above-referenced jointly administered bankruptcy cases (the “Bankruptcy Cases”) and Albert James Daulerio (“Mr. Daulerio” and together with the Debtors, the “Parties”) by and through their respective counsel, hereby enter into this stipulation (the “Stipulation and Order”) for an agreed order regarding the Daulerio Claims (as defined below).

**Recitals**

WHEREAS, Gawker Media filed a petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) on June 10, 2016 and GMGI and Gawker

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<sup>1</sup> The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary Kft. (f/k/a Kinja Kft.) (5056). Gawker Media LLC and Gawker Media Group, Inc.’s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Plan Administrator, 10 East 53rd Street, 33rd Floor, New York, NY 10022. Gawker Hungary Kft.’s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10022.

Hungary each filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code on June 12, 2016;

WHEREAS, Mr. Daulerio filed Claim Nos. 293, 294, and 295 in the Bankruptcy Cases with respect to claims alleging liability resulting from the Debtors' duty to defend and indemnify Mr. Daulerio in connection with the judgment entered on June 7, 2016 in the suit by Terry Gene Bollea ("Bollea") and the proceedings relating to additional pending and potential lawsuits by Bollea against Mr. Daulerio (collectively, the "Daulerio Claims");

WHEREAS, on November 28, 2016, the Debtors filed the *Debtors' Omnibus Objection to Proofs of Claim Nos. 293, 294 and 295 Filed by Albert James Daulerio* [Docket No. 493] (the "Objection");

WHEREAS, after multiple adjournments of the hearing on the Objection, the Parties have now agreed that Mr. Daulerio has been paid in full with respect to any amounts owed for the liability asserted in the Daulerio Claims;

WHEREAS, the Parties therefore wish to stipulate to the Daulerio Claims being satisfied in full and agree to the withdrawal of the Objection;

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, AND SO ORDERED THAT:**

1. Prime Clerk LLC, as claims agent in the Bankruptcy Cases, is authorized and directed to amend the claims register to reflect that the Daulerio Claims have been satisfied.
2. The Objection is deemed withdrawn.

3. The Court shall retain exclusive jurisdiction over all matters pertaining to the implementation, interpretation, and enforcement of this Stipulation and Order.

Dated: November 7, 2017  
New York, New York

Dated: November 7, 2017  
Cleveland, Ohio

/s/ Gregg M. Galardi  
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/s/ David Marburger  
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*Counsel for Mr. Daulerio*

SO ORDERED:

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HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE