

# **EXHIBIT B**

IN THE DISTRICT COURT OF APPEAL  
SECOND DISTRICT, STATE OF FLORIDA

BLOGWIRE HUNGARY SZELLEMI  
ALKOTÁST HASZNOSÍTÓ, KFT,

Defendant/Appellant,

Case No. 2D14-2630  
L.T. No. 12012447-CI-011

vs.

TERRY GENE BOLLEA professionally  
known as HULK HOGAN,

Plaintiff/Appellee.

\_\_\_\_\_ /

**APPELLANT’S EXTRAORDINARY MOTION FOR ORAL ARGUMENT**

Specially-Appearing Defendant/Appellant BLOGWIRE HUNGARY SZELLEMI ALKOTÁST HASZNOSÍTÓ, KFT (“Blogwire Hungary”), respectfully moves this Court to set this interlocutory appeal for oral argument. Counsel for Blogwire Hungary believes in good faith that oral argument will be of substantial assistance to the Court. The opportunity for counsel to answer to Court’s questions about the procedural history and important legal issues presented will assist the Court in coming to an efficient resolution.

This case involves claims of invasion of privacy (and related torts) brought by the professional wrestler known as Hulk Hogan against Gawker Media, LLC (“Gawker”), the publisher of Gawker.com, as well as its sister company, Blogwire Hungary, a Hungarian corporation with no assets, employees or operations in

Florida. While Gawker, the *actual publisher of the article at issue in this lawsuit*, has actively defended the case during the **two years** it has now been pending, Blogwire Hungary – a software development and intellectual property holding company with *no* connection to the article at issue in this lawsuit – has consistently maintained (and presented abundant evidence) that the court lacks jurisdiction over it under both Florida law and the Due Process Clause. Nevertheless, after two hearings and significant discovery, the court below has refused to let Blogwire Hungary out of the case, and thus Blogwire Hungary has appealed.

Although counsel for Blogwire Hungary understands that this Court does not routinely grant requests for oral argument, the undersigned believes in good faith that this case presents a worthy exception to that practice. The case has been actively litigated, and, as a result, the procedural history is admittedly complex. Blogwire Hungary believes that oral argument will assist the Court in understanding this history and the extensive factual record, and will allow the Court to more easily and efficiently focus the relevant legal issues.

Moreover, the issues raised herein are of great significance to the parties. The appeal can completely dispose of the claims as to Blogwire Hungary, which has been asserting lack of jurisdiction for two years. As to the bench and bar generally, the case involves important legal questions regarding when a foreign corporation may be subject to the jurisdiction of this Court and presents this

Court's first opportunity to address the Supreme Court's recent decision in *Daimler AG v. Bauman*, 571 U.S. ----, 134 S. Ct. 746 (2014) (holding that a foreign company could not be subject to American jurisdiction based on the actions of its U.S. affiliate), which, in Blogwire Hungary's view, the lower court improperly disregarded. The proper resolution of these issues will also assist in framing the remaining issues before the court below and may speed the conclusion of this case.

Accordingly, Blogwire Hungary respectfully moves this Court to grant its extraordinary request for oral argument.

Dated: October 17, 2014

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 17th day of October 2014, I caused a true and correct copy of the foregoing to be served the Florida Courts' E-Filing Portal upon the following counsel of record:

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