

EXHIBIT H

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

**TERRY GENE BOLLEA professionally
known as HULK HOGAN,**

Plaintiff,

vs.

Case No. 12012447CI-011

GAWKER MEDIA, LLC, et al.,

Defendants.

_____ /

**ORDER ON DEFENDANTS' MOTION FOR STAY OF
EXECUTION OF JUDGMENT PENDING APPEAL**

THIS CAUSE came before the Court on June 10, 2016 on the "Motion for Stay of Execution of Judgment Pending Appeal" filed by the Defendants, Gawker Media, LLC, Nick Denton, and A.J. Daulerio. The Court, having considered the motion, the Plaintiff's Bench Memorandum, the arguments of counsel, the record, and being otherwise advised in the premises, hereby

ORDERS AND ADJUDGES as follows:

1. Based upon the representations concerning the Defendants' financial condition, including the affidavits and financial documents filed in support of the Defendants' Motion for Stay of Execution of Judgment Pending Appeal, the Court hereby GRANTS a stay of execution of the Final Judgment dated June 7, 2016, pending appeal, subject to the following terms and conditions:

a. By no later than **June 13, 2016**, the Defendants all will take an appeal to the Florida Second District Court of Appeal to review the Final Judgment entered in this case on June 7, 2016, and filed in the records of this Court in book 19223 at page 748 (the "Final Judgment").

b. Defendant, Nick Denton represents that he currently owns, holds and controls 29.52 % of Gawker Media Group, Inc.'s issued and outstanding stock. Mr. Denton further represents that this stock is unrestricted, not subject to any liens, security interests or other encumbrances, and is freely assignable and transferrable to the Plaintiff; and further represents that he has obtained all necessary authorizations and approvals to transfer said stock pursuant to the terms and conditions set forth in this Order. Mr. Denton shall pledge any and all Gawker Media Group, Inc. stock which he holds, owns and/or controls to Plaintiff, Terry Bollea, as security for the Final Judgment pending appeal. On or before **5:00 p.m. on June 14, 2016**, Mr. Denton shall endorse, transfer and deliver to Bajo Cuva Cohen & Turkel, P.A., c/o Kenneth G. Turkel, Esq., 100 North Tampa Street, Suite 1900, Tampa, FL 33602, each and every share certificate(s) for any and all shares of stock of Gawker Media Group, Inc. which Mr. Denton owns, holds or controls. The certificates shall be endorsed such that all right, title and ownership of the shares immediately vests in Mr. Bollea upon the dismissal of Defendants' appeal or the affirmance of the Final Judgment. Bajo Cuva Cohen & Turkel, P.A. shall hold and maintain Mr. Denton's Gawker Media Group, Inc. stock certificate(s) in trust, until further order of this Court. If the Defendants shall satisfy the monetary award contained in the Final Judgment in full, including, if allowed by law, costs, interest, and attorneys' fees, and damages for delay in the event said appeal is dismissed or said judgment is affirmed, then this obligation shall be null and void and the shares of stock shall be returned to Defendant, Nick Denton; otherwise to remain in full force and effect.

c. The Defendants shall fully and completely comply with paragraphs 6, 7 and 8 of the Final Judgment on or before **June 17, 2016**.

d. The Defendants shall fully comply with paragraph 5 of the Final Judgment and the Permanent Injunction entered June 7, 2016.

e. The Plaintiff shall immediately be entitled to take any and all steps necessary and appropriate to perfect his rights as a judgment creditor and to establish and perfect his judgment lien and priority as a creditor of Defendants, including, without limitation, recording and re-recording the Final Judgment in any jurisdiction, filing judgment lien certificates, and domestication of the Final Judgment in any state or foreign country.

f. The Plaintiff shall immediately be entitled the following discovery:

- (1) The Plaintiff may serve requests for production and interrogatories in aid of execution upon each of the Defendants on **June 13, 2016**, and Defendants shall serve written responses and produce all non-privileged¹, responsive documents on or before **June 27, 2016**;
- (2) Mr. Denton, Mr. Daulerio and a corporate representative of Gawker Media, LLC shall appear for the taking of their depositions in aid of execution at mutually agreeable dates and times during the week of **July 11-15, 2016**;
- (3) The Court shall issue Letters Rogatory and any related orders necessary to permit Mr. Bollea to conduct discovery in the United Kingdom, Hungary and the Cayman Islands; and Mr. Bollea shall file a motion specifically identifying the records and documents he seeks through such discovery on or before **June 15, 2016**, at which

¹ A detailed privilege log must be provided for any documents or records withheld on the basis of privilege.

time Defendants shall have until **June 22, 2016** to object to any specific items sought by Mr. Bollea; and

- (4) The Plaintiff shall be entitled to depose non-party witnesses and serve subpoenas duces tecum with or without deposition to obtain documents and records associated with the Defendants' financial condition and any potential dissipation, diversion or transfers of assets by Defendants.

g. Without prior Court approval, the Defendants shall not dissipate any assets that may otherwise be subject to execution by Plaintiff, whether through sale, removal, alienation, transfer, assignment or encumbrance, or dilute Mr. Denton's Gawker Media Group, Inc. stock addressed in paragraph 1(b), and shall not instruct, request, counsel, demand, encourage or facilitate any other person or entity to take such actions, except as required to meet ordinary legal or business expenses and the cost of legal representation.

h. Notwithstanding paragraph 1(g), in the event of any potential sale of all or substantially all of the assets or stock of Gawker Media, LLC, Gawker Media Group, Inc., or Kinja, KFT, or any of the intellectual property owned by Kinja, KFT, Gawker Media, LLC and/or Mr. Denton shall immediately provide written notice (electronically or by certified mail) of the potential sale to counsel for the Plaintiff, but in any event no later than fourteen (14) days prior to the date of closing on any such sale. Such notice shall only be provided to counsel for the Plaintiff, shall be subject to the Stipulated Protective Order entered in this case, and shall provide the name of the purchaser(s), a detailed description of the assets, property and/or stock being sold, the sale price, and the date of the closing.

2. Pursuant to Florida Rule of Civil Procedure 9.310, this Court retains jurisdiction to modify the terms of this Order.

3. This Order is entered without prejudice to Mr. Bollea's right to seek additional security and/or a good and sufficient bond at any time.

DONE and ORDERED, in chambers, in St. Petersburg, Pinellas County, Florida, this _____ day of _____, 2016.

Pamela A.M. Campbell
Circuit Court Judge

Conformed copies served on:

All persons identified on the attached Service List

BOLLEA v. GAWKER
Case No: 12 012447 CI 11
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