

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

TERRY GENE BOLLEA professionally
known as HULK HOGAN,

Plaintiff,

Case No.: 12012447-CI-011

vs.

HEATHER CLEM; GAWKER MEDIA,
LLC aka GAWKER MEDIA; et al.,

Defendants.

**GAWKER MEDIA, LLC'S REPLY TO PLAINTIFF'S OPPOSITION TO GAWKER
MEDIA LLC'S MOTION FOR STAY PENDING APPELLATE REVIEW**

Gawker Media, LLC ("Gawker"), without addressing every argument made by Plaintiff Terry Bollea a/k/a Hulk Hogan ("Hogan"), files this limited reply to briefly address two points raised in Hogan's Opposition to Gawker's Motion for Stay Pending Appellate Review. First, Gawker will be filing a petition for writ of prohibition, the proper and permitted method for seeking appellate review of a denial of a motion for disqualification, by Friday, May 17, 2013. *E.g., Hayslip v. Douglas*, 400 So. 2d 553, 555 (Fla. 4th DCA 1981). Second, Gawker is only seeking a stay of these proceedings until such time as the Second District Court of Appeals has reviewed the forthcoming petition for writ of prohibition to determine if it will issue an order to show cause. Pursuant to Florida Rule of Appellate Procedure 9.100(h), if an order to show cause is issued, it "shall stay further proceedings in the lower tribunal."

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WHEREFORE, Defendant Gawker respectfully requests that the Court grant its Motion to Stay Pending Appeal.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th day of May 2013, I caused a true and correct copy of the foregoing to be served by mail and email upon the following counsel of record:

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