

EXHIBIT G

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF WESTCHESTER

----- X
In re SUBPOENA to YOUNG AMERICA
CAPITAL, LLC

GAWKER MEDIA, LLC

Petitioner,

-against-

TERRY GENE BOLLEA, professionally known as
HULK HOGAN,

Respondent.
----- X

Index No. 52004/2015

**REPLY AFFIRMATION IN
FURTHER SUPPORT
OF MOTION TO QUASH AND
FOR A PROTECTIVE ORDER**

DANIELLE C. LESSER, ESQ. an attorney duly admitted to practice before the Courts of
this State, affirms the following to be true under penalties of perjury:

1. I am a member of Morrison Cohen LLP, counsel to Young America
Capital, LLC (“YAC”), and respectfully submit this affirmation in further support of YAC’s
Motion pursuant to Sections 2304 and 3103 of the New York Civil Practice Law and Rules
(“CPLR”) to quash the Subpoena Ad Testificandum and Duces Tecum served by Plaintiff Terry
Gene Bollea, professionally known as Hulk Hogan (“Plaintiff”) and for the issuance of a
protective order.

2. As set forth in greater detail in Gawker’s reply papers dated March 2,
2015, in further support of its motion to quash and for a protective order, which arguments are
incorporated herein, the Subpoena must be quashed and a protective order issued because the
Subpoena, among other things, (i) is facially defective; (ii) is overly broad and unduly
burdensome and served for purposes of harassment; (iii) seeks testimony and documents which
appear to have no relevance to the facts, claims, and/or defenses that are at issue in the Florida

Action; (iii) appears to exceed the scope of a discovery order in the Florida Action; and (iv) seeks discovery that has already been produced or will be produced in the Florida Action.

3. YAC was not a participant in, or otherwise involved in, the events underlying the Complaint. It appears from Gawker's moving and reply papers that the scope of the Subpoena seeks information beyond the scope of discovery orders in the Florida action. It also appears that the information sought by the Plaintiff in the Subpoena has been produced by Gawker.

4. The Subpoena, a fishing expedition, imposes an undue burden upon YAC, an unrelated third party who has no link to the underlying allegations and indeed had no relationship with Gawker at the time of the events in question. YAC seeks to maintain the confidentiality of information provided to it by Gawker and seeks to stay out of a dispute that has nothing to do with it. The Subpoena should therefore be quashed in all respects and a protective order should be issued to prevent this abuse of the litigation process.

WHEREFORE, it is respectfully requested that YAC's motion to quash and for a protective order be granted and for such other and further relief as this Court deems just and proper.

Dated: New York, New York
March 2, 2015



DANIELLE C. LESSER

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