EXHIBIT F

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CURRENCE COURT OF THE CTATE OF VEW YORK

YSCEF DOC. NO. 27 RECEIVED NYSCEF: 03/02/2015

COUNTY OF WESTCHESTER	X
In re SUBPOENA to YOUNG AMERICA CAPITAL, LLC	:
GAWKER MEDIA, LLC	: Index No. 52004/2015
Petitioner,	:
-against-	REPLY AFFIRMATION OF
TERRY GENE BOLLEA, professionally known as HULK HOGAN,	ALIA L. SMITH, ESQ.
Respondent.	:
	X

ALIA L. SMITH, an attorney duly authorized to practice in the State of New York, does hereby affirm that the following is true under penalty of perjury pursuant to CPLR § 2106:

- I am a partner in Levine Sullivan Koch & Schulz, LLP, counsel to Petitioner
 Gawker Media, LLC ("Gawker"), in this proceeding. I submit this Reply Affirmation simply to put a few additional items before the Court.
- 2. As I explained in my initial Affirmation at ¶ 3, Gawker, in *Bollea v. Clem, et al.*, No. 12012447-CI-011 (Fla. 6th Jud. Cir.) (the "Florida Litigation"), has produced to Respondent ("Hogan") its income statements, balance sheets, statements of monthly revenue for the company as a whole and for each of the eight websites it publishes, its advertising insertion orders, information about its other sources of revenue, and its bank statements showing all financial transactions between it and its sister company, Kinja, KFT, for the period 2011 to 2013 (and in some instances for other years as well).
- 3. Gawker also produced financials for 2011 through 2013 that had either been reviewed (2011 and 2012) or audited (2013) by its outside Certified Public Accountants. True

and correct copies of the accountants' introductory letters to these financial statements are attached hereto as Exhibit 1.

- 4. A hearing before Judge Pamela A.M. Campbell, who is presiding over the Florida Litigation, was held on December 17, 2014. A true and correct copy of excerpts from the transcript of this hearing are attached hereto as Exhibit 2.
- 5. I further submit this Reply Affirmation to confirm that the representations made by Hogan at page 5 of his Opposition, concerning the financial condition of Gawker in 2012 and 2013, are based on financial documents that were designated "Confidential" under the protective order in place in the Florida Litigation. Hogan did not seek the consent of Gawker before making that information public, as he was required to do pursuant to the protective order.

Dated: March 2, 2015

alia Smith