EXHIBIT H

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SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF WESTCHESTER		
In re SUBPOENA to YOUNG AMERICA CAPITAL, LLC	X : :	
GAWKER MEDIA, LLC	: :	Index No. 52004/2015
Petitioner,	:	
-against- TERRY GENE BOLLEA, professionally known as HULK HOGAN,	: : :	AFFIDAVIT OF SCOTT KIDDER
Respondent.	: : v	
	Λ	

SCOTT KIDDER, under penalty of perjury, hereby swears as follows:

- 1. I am the Chief Operating Officer of Gawker Media, LLC ("Gawker"). I have personal knowledge of the facts set forth in this Affidavit, which I submit in support of Gawker's motion to quash a subpoena issued to its debt advisor Young America Capital, LLC ("YAC") and for a protective order.
- 2. Gawker's financials were reviewed in 2011 and 2012, and were audited in 2013, by its outside accountants, Citrin Cooperman (Certified Public Accountants). Those reviewed and audited financial statements were submitted to Gawker's lender in connection with obtaining and maintaining a loan and line of credit. It is my understanding that copies of these financials were previously produced in discovery to the plaintiff in *Bollea v. Clem, et al.*, No. 12012447-CI-011 (Fla. 6th Jud. Cir.) (the "Florida Litigation"), and that the accountants' introductory letter is attached to the Reply Affirmation of Alia L. Smith, Gawker's counsel.
- 3. Gawker also provided the same 2013 audited financials to YAC, but, as indicated above, these have already been produced in the Florida Litigation.

4. No advertising was displayed on the web posting at issue in the underlying lawsuit, and the total traffic to that webpage represented just 7/100ths of one percent of Gawker's total traffic for 2012 (the year that the post was published).

Dated: March 2, 2015

Scott K

STATE OF NEW YORK

COUNTY OF NEW YORK

The foregoing Affidavit of Scott Kidder was SWORN TO AND SUBSCRIBED before me this 2^{nd} day of March, 2015.

Notary Public, State of New York

RACHEL STROM
Notary Public, State of New York
No. 02ST6171616
Qualified in Kings County
Gemmission Expires October 17, 2015

(Print, type, or stamp Commissioned name of Notary Public)