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*Counsel to the Plan Administrator
for the Debtors*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11
	:	
Gawker Media LLC, <i>et al.</i> , ¹	:	Case No. 16-11700 (SMB)
	:	
Debtors.	:	(Jointly Administered)
	:	
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**NOTICE OF PRESENTMENT OF PROPOSED ORDER GRANTING DEBTORS’
OBJECTION TO THE CLAIMS OF ALADAR BALDAUF (CLAIM NOS. 326 AND 332)**

PLEASE TAKE NOTICE that on February 6, 2017, the above-captioned debtors (the “Debtors”) filed the *Debtors’ Objection to the Claims of Aladar Baldauf (Claim Nos. 326 and 332)* [Docket No. 732] (the “Objection”), with a proposed order attached as Exhibit A to the Objection. The response deadline in respect of the relief sought in the Objection was on February 28, 2017, pursuant to the *Notice of Debtors’ Objection to the Claims of Aladar Baldaduf (Claim Nos. 326 and 332)* [Docket No. 723].

¹ The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Kinja Kft. (5056). Gawker Media LLC and Gawker Media Group, Inc.’s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Chief Restructuring Officer, 10 East 53rd Street, 33rd Floor, New York, NY 10022. Kinja Kft.’s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10022.

PLEASE TAKE FURTHER NOTICE that on April 14, 2017, counsel to the Plan Administrator for the Debtors filed the *Declaration of Gregg M. Galardi Submitting Certain Documentation Received from Aladar Baldauf* [Docket No. 859].

PLEASE TAKE FURTHER NOTICE that on April 18, 2017, a hearing on the Objection (the “Hearing”) was held before the Honorable Stuart M. Bernstein of the United States Bankruptcy Court for the Southern District of New York (the “Court”).

PLEASE TAKE FURTHER NOTICE that at the Hearing, the Court stated that it would enter the proposed order and directed the Debtors to submit the proposed order on 10 days’ notice.

PLEASE TAKE FURTHER NOTICE that attached hereto as Exhibit A is the proposed order (the “Proposed Order”).

PLEASE TAKE FURTHER NOTICE that attached hereto as Exhibit B is a blackline of the Proposed Order against the proposed order submitted with the Objection.

[REMAINDER OF THIS PAGE INTENTIONALLY LEFT BLANK]

PLEASE TAKE FURTHER NOTICE that the Debtors will present to the Court the
Proposed Order for signature on April 28, 2017 at 4:00 p.m.

Dated: April 18, 2017
New York, New York

/s/ Gregg M. Galardi
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*Counsel to the Plan Administrator
for the Debtors*

EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11

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Gawker Media LLC, *et al.*,¹ : Case No. 16-11700 (SMB)

:

Debtors. : (Jointly Administered)

:

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**ORDER GRANTING DEBTORS’ OBJECTION TO THE
CLAIMS OF ALADAR BALDAUF (CLAIM NOS. 326 AND 332)**

Upon the objection (the “Objection”)² of the above-caption debtors (collectively, the “Debtors”), for entry of an order (this “Order”) disallowing and expunging the claims set forth on **Schedule 1** attached hereto (the “Claims”); and upon the Holden Declaration; and upon the *Declaration of Gregg M. Galardi Submitting Certain Documentation Received from Aladar Baldauf* [Docket No. 859] (the “Galardi Declaration”); and the Court having found that it has jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b); and the Court having found that venue of this proceeding and the Objection is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Objection having been provided, and it appearing that no other or further notice need be provided; and upon consideration of the Objection, the Holden Declaration, the Galardi Declaration, the certified translations of the judgments of the Budapest Court dated September 30, 2015 and the Budapest Court of Appeals dated April 26, 2016

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² Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

presented to the Court at the Hearing, and the certified translation of the K&H Bank Zrt. bank statement presented to the Court at the Hearing; and the Court having found and determined that the relief sought in the Objection is in the best interests of the Debtors' estates, creditors, and all parties in interest and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED THAT:

1. The relief requested in the Objection is granted to the extent provided herein.

2. Pursuant to section 502(b) of the Bankruptcy Code, the Claims are hereby disallowed and expunged in their entirety for the reasons set forth in the Objection.

3. Prime Clerk LLC, the Debtors' claims and noticing agent, is authorized to cause the Claims Register to be amended to reflect the terms of this Order.

4. The disallowance and expunging of the Claims shall not create, and is not intended to create, any rights in favor of, or enhance the status of, any claim held by any person or entity.

5. Entry of this Order is without prejudice to the Debtors' right to object to any other claims in these chapter 11 cases or to further object to the Claims (to the extent the Claims are not disallowed and expunged pursuant to this Order) on any grounds whatsoever, at a later date.

6. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of any claim not listed on Schedule 1 annexed to this Order, and the Debtors' and any party in interest's rights to object on any basis is expressly reserved with respect to any such claim not listed on Schedule 1 annexed hereto.

7. Notice of the Objection, as provided therein, shall be deemed good and sufficient notice of such objection, and the requirements of Bankruptcy Rule 3007(a), the Case Management Procedures entered on July 13, 2016 [Docket No. 93], and the Local Bankruptcy Rules of this Court are satisfied by such notice.

8. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

9. The Debtors are authorized and empowered to take all actions as may be necessary and appropriate to implement the terms of this Order.

10. This Order shall be a final order with respect to the Claims.

11. This Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2017
New York, New York

THE HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE

Schedule 1

NO.	CLAIMANT	CASE NUMBER	DEBTOR NAME	SCH NO.	CLAIM NO.	DATE FILED	CLAIM AMOUNT	OBJECTION PAGE NO. REFERENCE
1	Baldauf, Aladar Simmelweis utca 5. Budapest 1052 Hungary	16-11718 (SMB)	Gawker Hungary Kft. (f/k/a Kinja Kft.)	N/A	326	11/15/2016	\$35,000.00	5
2	Baldauf, Aladar Simmelweis utca 5. Budapest 1052 Hungary	16-11718 (SMB)	Gawker Hungary Kft. (f/k/a Kinja Kft.)	N/A	332	11/15/2016	\$35,000.00	5

EXHIBIT B

Redline of Proposed Order against Proposed Order filed with Objection

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
:

In re : Chapter 11

:

Gawker Media LLC, *et al.*,¹ : Case No. 16-11700 (SMB)

:

Debtors. : (Jointly Administered)

:

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**ORDER GRANTING DEBTORS’ OBJECTION TO THE
CLAIMS OF ALADAR BALDAUF (CLAIM NOS. 326 AND 332)**

Upon the objection (the “Objection”)² of the above-caption debtors (collectively, the “Debtors”), for entry of an order (this “Order”) disallowing and expunging the claims set forth on **Schedule 1** attached hereto (the “Claims”); and upon the Holden Declaration; and upon the [*Declaration of Gregg M. Galardi Submitting Certain Documentation Received from Aladar Baldauf*](#) [Docket No. 859] (the “Galardi Declaration”); and the Court having found that it has jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b); and the Court having found that venue of this proceeding and the Objection is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Objection having been provided, and it appearing that no other or further notice need be provided; and upon consideration of

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² Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

the Objection ~~and~~, the Holden Declaration, the Galardi Declaration, the certified translations of the judgments of the Budapest Court dated September 30, 2015 and the Budapest Court of Appeals dated April 26, 2016 presented to the Court at the Hearing, and the certified translation of the K&H Bank Zrt. bank statement presented to the Court at the Hearing; and the Court having found and determined that the relief sought in the Objection is in the best interests of the Debtors' estates, creditors, and all parties in interest and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED THAT:

1. The relief requested in the Objection is granted to the extent provided herein.

2. Pursuant to section 502(b) of the Bankruptcy Code, the Claims are hereby disallowed and expunged in their entirety for the reasons set forth in the Objection.

3. Prime Clerk LLC, the Debtors' claims and noticing agent, is authorized to cause the Claims Register to be amended to reflect the terms of this Order.

4. The disallowance and expunging of the Claims shall not create, and is not intended to create, any rights in favor of, or enhance the status of, any claim held by any person or entity.

5. Entry of this Order is without prejudice to the Debtors' right to object to any other claims in these chapter 11 cases or to further object to the Claims (to the extent the Claims are not disallowed and expunged pursuant to this Order) on any grounds whatsoever, at a later date.

6. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of any claim not listed on Schedule 1 annexed to this Order, and

the Debtors' and any party in interest's rights to object on any basis is expressly reserved with respect to any such claim not listed on Schedule 1 annexed hereto.

7. Notice of the Objection, as provided therein, shall be deemed good and sufficient notice of such objection, and the requirements of Bankruptcy Rule 3007(a), the Case Management Procedures entered on July 13, 2016 [Docket No. 93], and the Local Bankruptcy Rules of this Court are satisfied by such notice.

8. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

9. The Debtors are authorized and empowered to take all actions as may be necessary and appropriate to implement the terms of this Order.

10. This Order shall be a final order with respect to the Claims.

11. This Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2017
New York, New York

THE HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE

Schedule 1

NO.	CLAIMANT	CASE NUMBER	DEBTOR NAME	SCH NO.	CLAIM NO.	DATE FILED	CLAIM AMOUNT	OBJECTION PAGE NO. REFERENCE
1	Baldauf, Aladar Simmelweis utca 5. Budapest 1052 Hungary	16-11718 (SMB)	Gawker Hungary Kft. (f/k/a Kinja Kft.)	N/A	326	11/15/201 6	\$35,000.00	5
2	Baldauf, Aladar Simmelweis utca 5. Budapest 1052 Hungary	16-11718 (SMB)	Gawker Hungary Kft. (f/k/a Kinja Kft.)	N/A	332	11/15/201 6	\$35,000.00	5