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Counsel for Gizmodo Media Group, LLC

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

-----	X
	:
In re:	: Chapter 11
	:
Gawker Media LLC, <i>et al.</i> , ¹	: Case No. 16-11700 (SMB)
	:
Debtors.	: (Jointly Administered)
	:
	: Related Docket Nos. 985, 1006, 1015, 1063
-----	X

NOTICE OF SETTLEMENT

PLEASE TAKE NOTICE that, pursuant to Rule 9074-1 of the Local Rules of

Bankruptcy Procedure for the Southern District of New York, the proposed order annexed hereto

¹ The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary Kft. (f/k/a 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 10020. Gawker Hungary Kft's mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10020.

as Exhibit A (the “Proposed Order”) will be presented for settlement and entry to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at Room 723 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, NY 10004-1408 (the “Court”) for signature on Wednesday, December 26, 2017 at 12:00 p.m. (prevailing Eastern Time).

PLEASE TAKE FURTHER NOTICE that, objections to the entry of the Proposed Order or proposed counter-orders must be in writing and shall be filed with the Court (with a courtesy copy delivered to the chambers of the Honorable Stuart M. Bernstein) and served so as to be actually received by the undersigned not later than 11:30 a.m. on Wednesday, December 26, 2017 (prevailing Eastern Time).

PLEASE TAKE FURTHER NOTICE that, unless objections or proposed counterorders are filed and served as set forth above, the Proposed Order will be deemed uncontroverted and may be entered by the Court.

Dated: New York, New York
December 18, 2017

Respectfully Submitted,

LATHAM & WATKINS LLP

/s/ Peter M. Gilhuly

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Exhibit A

Proposed Order

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

-----	X	
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In re:	:	Chapter 11
	:	
Gawker Media LLC, <i>et al.</i> , ¹	:	Case No. 16-11700 (SMB)
	:	
Debtors.	:	(Jointly Administered)
-----	X	

**ORDER GRANTING IN PART AND DENYING IN PART THE MOTION OF
GIZMODO MEDIA GROUP, LLC TO ENFORCE THE SALE ORDER**

Upon the motion (the “Motion”) dated August 21, 2017 of Gizmodo Media Group, LLC (“Gizmodo”) to Enforce the Sale Order and to Bar Certain Plaintiffs from Prosecuting their State Court Actions [Dkt. No. 985]; and upon the objection to the Motion by Pregame LLC d/b/a Pregame.com and Randall James Busack, professionally known as RJ Bell dated September 15, 2017 [Dkt. No. 1006] (the “Objection”); and upon Gizmodo’s reply to the Objection dated September 25, 2017 [Dkt. No. 1015]; and upon the record of the hearing on the Motion held on September 28, 2017; and upon the Memorandum Decision Regarding Motion to Enforce the Sale Order of this Court dated December 12, 2017 [Dkt. No. 1063] (the “Decision”);² and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Motion is granted in part and denied in part in accordance with and for the reasons set forth in the Decision, and, therefore, the Plaintiffs are enjoined from asserting

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

any claims against Gizmodo, including in any state court, arising from the publication of the allegedly defamatory Article on June 23, 2016.

Dated: _____, 2017
New York, New York

HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE