ROPES & GRAY LLP Gregg M. Galardi Joshua Y. Sturm 1211 Avenue of the Americas New York, NY 10036-8704 Telephone: (212) 596-9000 Facsimile: (212) 596-9090

*Counsel to Plan Administrator for the Debtors* 

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re	: Cha	apter 11
	:	
Gawker Media LLC, et al., <sup>1</sup>	: Cas	se No. 16-11700 (SMB)
	:	
Debtors.	: (Joi	intly Administered)
	:	
	<b>v</b>	

#### AMENDED AGENDA FOR HEARING TO BE HELD NOVEMBER 30, 2017 AT 10:00 A.M. (PREVAILING EASTERN TIME)<sup>2</sup>

Date and Time:	November 30, 2017 at 10:00 A.M. (Prevailing Eastern Time)
Location of Hearing:	The Honorable Judge Stuart M. Bernstein United States Bankruptcy Court for the Southern District of New York Alexander Hamilton Custom House One Bowling Green, Courtroom No. 723 New York, New York 10004
Copies of Motions:	A copy of each pleading can be viewed on the Court's website at <u>www.nysb.uscourts.gov</u> and the website of the Debtors' notice and claims agent, Prime Clerk LLC, at <u>https://cases.primeclerk.com/gawker</u> . Further information may be obtained by calling Prime Clerk toll free at 855-639-3375 or internationally at 1-917-651-0323.

<sup>1</sup> 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, Plan Administrator, 10 East 53rd Street, 33rd Floor, New York, NY 10022. Gawker Hungary Kft.'s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10022.

<sup>&</sup>lt;sup>2</sup> New material added since the filing of the original agenda [Docket No. 1054] is listed in italics in this amended agenda.

## **CONTESTED MATTERS**

1. Notice of Presentment of Order Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure Authorizing the Plan Administrator to Conduct Discovery Concerning Potential Causes of Action and to Establish Discovery Response and Dispute Procedures [Docket No.1042]

Response Deadline: November 22, 2017

#### **Responses Received:**

- a. The Thiel Parties' (1) Objection to Plan Administrators' Proposed Order Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure Authorizing the Plan Administrator to Conduct Discovery Concerning Potential Causes of Action and to Establish Discovery Response and Dispute Procedures, and (2) Motion for Reargument [Docket No. 1047]
- b. Transmittal Declaration of Robert A. Weber in Support of Objections of the Thiel Parties' to Plan Administrators' Proposed Order Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure Authorizing the Plan Administrator to Conduct Discovery Concerning Potential Causes of Action and to Establish Discovery Response and Dispute Procedures and Motion for Reargument [Docket No. 1048]
- c. Objection of Terry G. Bollea, Charles J. Harder, Esq., and Harder Mirell & Abrams LLP to Plan Administrators' Proposed Order Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure Authorizing the Plan Administrator to Conduct Discovery Concerning Potential Causes of Action and to Establish Discovery Response and Dispute Procedures [Docket No. 1050]
- d. Plan Administrator's Omnibus Reply (I) In Support of Notice of Presentment of Order Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure to Conduct Discovery Concerning Potential Causes of Action and to Establish Discovery Response and Dispute Procedures and (II) In Opposition to Thiel's Motion for Reargument [Docket No. 1055]

# **Related Documents:**

- e. Motion of the Debtors for Leave Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure to Conduct Discovery Concerning Potential Plan Issues and Potential Causes of Action, and to Establish Discovery Response and Dispute Procedures [Docket No. 341]
- f. Amended Declaration of D. Ross Martin in Support of the Motion of the Debtors for Leave Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure to Conduct Discovery Concerning Potential Plan Issues and Potential Causes of Action, and to Establish Discovery Response and Dispute Procedures [Docket No. 344]

- g. Objection of Harder Mirell & Abrams LLP and Charles J. Harder, Esq. to Motion Objection of Harder Mirell & Abrams LLP and Charles J. Harder, Esq. to Motion of the Debtors for Leave Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure to Conduct Discovery Concerning Potential Plan Issues and Potential Causes of Action, and to Establish Discovery Response and Dispute Procedures [Docket No. 869]
- h. Objection of Peter Thiel and Thiel Capital LLC to Motion of the Debtors for Leave Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure to Conduct Discovery Concerning Potential Plan Issues and Potential Causes of Action, and to Establish Discovery Response and Dispute Procedures [Docket No. 870]
- Objection of Terry G. Bollea to Motion of the Debtors for Leave Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure to Conduct Discovery Concerning Potential Plan Issues and Potential Causes of Action, and to Establish Discovery Response and Dispute Procedures [Docket No. 871]
- j. Declaration of Shane Vogt in Opposition to the Motion of Debtors for Leave Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure to Conduct Discovery Concerning Potential Plan Issues and Potential Causes of Action, and to Establish Discovery Response and Dispute Procedures [Docket No. 872
- Mathematical Karaman Kara
- 1. Transcript regarding Hearing Held on 4/25/2017 10:01 AM RE: Application for FRBP 2004 Examination Motion of the Debtors for Leave Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure to Conduct Discovery Concerning Potential Plan Issues and Causes of Action, and to Establish Discovery Response and Dispute Procedures [Docket No. 891]
- m. Memorandum Decision Granting in Part and Denying in Part Plan Administrator's Motion for Leave to Conduct a Rule 2004 Examination [Docket No. 934]
- n. Corrected Memorandum Decision Granting in Part and Denying in Part Plan Administrator's Motion for Leave to Conduct a Rule 2004 Examination [Docket No. 936]

# **<u>Status:</u>** This matter is going forward.

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# WITHDRAWN MATTERS

2. Debtors' Omnibus Objection to Proofs of Claim Nos. 293, 294 and 295 filed by Albert James Daulerio [Docket No. 493]

Response Deadline: August 8, 2017

Responses Received: None.

## **Related Documents:**

- a. Notice of Adjournment of Hearing on Debtors' Omnibus Objection to Proofs of Claim Nos. 293, 294 and 295 filed by Albert James Daulerio [Docket No. 627]
- b. Notice of Further Adjournment of Hearing on Debtors' Omnibus Objection to Proofs of Claim Nos. 293, 294 and 295 filed by Albert James Daulerio [Docket No. 688]
- c. Notice of Further Adjournment of Hearing on Debtors' Omnibus Objection to Proofs of Claim Nos. 293, 294 and 295 filed by Albert James Daulerio [Docket No. 735]
- d. Notice of Further Adjournment of Hearing on Debtors' Omnibus Objection to Proofs of Claim Nos. 293, 294 and 295 filed by Albert James Daulerio [Docket No. 799]
- e. Notice of Further Adjournment of Hearing on Debtors' Omnibus Objection to Proofs of Claim Nos. 293, 294 and 295 filed by Albert James Daulerio [Docket No. 853]
- f. Notice of Further Adjournment of Hearing on Debtors' Omnibus Objection to Proofs of Claim Nos. 293, 294 and 295 filed by Albert James Daulerio [Docket No. 907]
- g. Notice of Further Adjournment of Hearing on Debtors' Omnibus Objection to Proofs of Claim Nos. 293, 294 and 295 filed by Albert James Daulerio [Docket No. 921]
- h. Notice of Further Adjournment of Hearing on Debtors' Omnibus Objection to Proofs of Claim Nos. 293, 294 and 295 filed by Albert James Daulerio [Docket No. 950]
- i. Notice of Further Adjournment of Hearing on Debtors' Omnibus Objection to Proofs of Claim Nos. 293, 294 and 295 filed by Albert James Daulerio [Docket No. 971]
- j. Notice of Further Adjournment of Hearing on Debtors' Omnibus Objection to Proofs of Claim Nos. 293, 294 and 295 filed by Albert James Daulerio [Docket No.1003]

- k. Notice of Further Adjournment of Hearing on Debtors' Omnibus Objection to Proofs of Claim Nos. 293, 294 and 295 filed by Albert James Daulerio [Docket No.1035]
- 1. Notice of Presentment of Stipulation and Order Between the Plan Administrator and Albert James Daulerio Regarding Proofs of Claim Nos. 293, 294 and 295 [Docket No. 1041]
- M. Stipulation and Order Between the Plan Administrator and Albert James Daulerio Regarding Proofs of Claim Nos. 293, 294, and 295 [Docket No. 1052]
- n. Notice of Withdrawal of Debtors' Objection to the Claims of the Albert James Daulerio [Docket No.1053]

# **<u>Status:</u>** The Debtors have withdrawn their objection to the claims filed by the Mr. Daulerio. Accordingly, this matter is not going forward.

Dated: November 29, 2017 New York, New York /s/ Gregg M. Galardi ROPES & GRAY LLP Gregg M. Galardi Joshua Y. Sturm 1211 Avenue of the Americas New York, NY 10036-8704 Telephone: (212) 596-9000 Facsimile: (212) 596-9090 gregg.galardi@ropesgray.com joshua.sturm@ropegray.com

Counsel to the Plan Administrator for the Debtors