

# EXHIBIT 2

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
OF THE STATE OF FLORIDA, IN AND FOR PINELLAS COUNTY

-----  
TERRY GENE BOLLEA, professionally  
known as HULK HOGAN,

Plaintiff,

No. 12-012447-CI-011

vs.

HEATHER CLEM; GAWKER MEDIA, LLC,  
aka GAWKER MEDIA, et al.,

Defendants.  
-----

VOLUME 1

VIDEOTAPED  
DEPOSITION OF: TERRY GENE BOLLEA  
  
DATE: March 6, 2014  
  
TIME: 9:43 a.m. to 1:06 p.m.  
  
PLACE: Riesdorff Reporting Group  
601 Cleveland Street  
Suite 600  
Clearwater, Florida  
  
PURSUANT TO: Notice by counsel for  
Defendants for purposes of  
discovery, use at trial or  
such other purposes as are  
permitted under the Florida  
Rules of Civil Procedure  
  
REPORTED BY: Susan C. Riesdorff, RPR, CRR  
Notary Public, State of  
Florida

Pages 1 - 154

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

APPEARANCES:

CHARLES J. HARDER, ESQUIRE  
KIMBERLINA MCKINNEY, ESQUIRE  
Harder Mirell & Abrams, LLP  
1925 Century Park East  
Suite 800  
Los Angeles, California 90067

- and -

KENNETH G. TURKEL, ESQUIRE  
Bajo Cuva Cohen & Turkel, P.A.  
100 North Tampa Street  
Suite 1900  
Tampa, Florida 33602

- and -

DAVID R. HOUSTON, ESQUIRE  
Law Office of David R. Houston  
432 Court Street  
Reno, Nevada 89501  
Attorneys for Plaintiff

1 APPEARANCES (continued):

2 SETH D. BERLIN, ESQUIRE  
3 Levine Sullivan Koch & Schulz, LLP  
4 1899 L Street, N.W.  
5 Suite 200  
6 Washington, D.C. 20036

7 - and -

8 MICHAEL BERRY, ESQUIRE  
9 PAUL J. SAFIER, ESQUIRE  
10 Levine Sullivan Koch & Schulz, LLP  
11 1760 Market Street  
12 Suite 1001  
13 Philadelphia, Pennsylvania 19103

14 - and -

15 RACHEL E. FUGATE, ESQUIRE  
16 Thomas & Locicero, P.L.  
17 601 South Boulevard  
18 Tampa, Florida 33606

19 - and -

20 HEATHER DIETRICK, ESQUIRE  
21 General Counsel  
22 Gawker Media  
23 210 Elizabeth Street  
24 Third Floor  
25 New York, New York 10012  
Attorneys for Defendant Gawker Media, LLC

MICHAEL GOLD, ESQUIRE  
Barry A. Cohen Law Group  
201 East Kennedy Boulevard  
Suite 1000  
Tampa, Florida 33602  
Attorney for Defendant Heather Clem

ALSO PRESENT:

Honorable James Case  
Mike Byrd, Videographer

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

# REDACTED

Q. Do you have an agent?

A. Yes.

Q. Who is that?

A. Peter Young.

Q. How long has Mr. Young been your agent?

A. 35 years.

# REDACTED

1 **REDACTED**  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12

13 A. I have -- you know, I misspoke. I do have  
14 another agent. I have a sports agent, which has  
15 nothing to do with TV, film, or anything like that. I  
16 have a sports agent named Darren Prince. He books me  
17 on appearances and what we call one-offs, like  
18 autograph signings. He did the Super Bowl commercial.

19 **REDACTED**  
20

21 Q. What about Mr. Young, what does he do for  
22 you?

23 A. Primarily TV or film stuff. Every once in a  
24 while in a blue moon, there will be something come  
25 along like a one-off in like a video game or -- we just

1 reality show.

2 Q. And has not had a reality --

3 A. And has not. That's the same answer as I  
4 answered before.

5 Q. In 2012, you were affiliated with TNA  
6 Wrestling; is that right?

7 A. Yes.

8 Q. What does TNA stand for?

9 A. Total Nonstop Action.

10 Q. When did your affiliation with TNA Wrestling  
11 begin?

12 A. It's best for me to backtrack because I'm  
13 really bad with dates, as you can tell. My affiliation  
14 ended about six months ago, and I worked there for four  
15 years.

16 Q. And what roles did you play in the  
17 organization?

18 A. I was talent. And that talent encompassed  
19 being general manager of TNA on camera and it  
20 encompassed a couple wrestling matches that weren't  
21 really wrestling.

22 Q. In which you were wrestling?

23 A. Yeah. I was in the ring, but instead of  
24 actually making moves, I really didn't do anything at  
25 all. Even though it was advertised as a wrestling

1 Q. Was part of your job to promote the  
2 organization?

3 A. Yes.

4 **REDACTED**  
5  
6

7  
8  
9  
10 Q. How does TNA compare to WWE?

11 A. It doesn't.

12 Q. How do you mean?

13 A. I -- I don't know even how to explain it. It  
14 doesn't compare.

15 Q. Is one of them a bigger deal than the other  
16 one in the wrestling world?

17 A. One of them is. One of them is a wrestling  
18 company and one of them is not.

19 Q. Which one is which?

20 A. WWE is the wrestling company.

21 **REDACTED**  
22  
23  
24  
25



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

CERTIFICATE OF OATH

STATE OF FLORIDA  
COUNTY OF HILLSBOROUGH

I, the undersigned authority, certify that TERRY  
GENE BOLLEA personally appeared before me and was duly  
sworn.

WITNESS my hand and official seal this 11th day of  
March, 2014.

*Susan C. Riedorff*

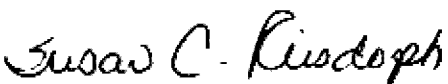


Susan C. Riedorff, RPR, CRR, CLSP  
Notary Public - State of Florida  
My Commission Expires: 6/10/13  
Commission No.: DD 891977

## 1 REPORTER'S CERTIFICATE

2  
3 STATE OF FLORIDA :

4 COUNTY OF HILLSBOROUGH :

5  
6  
7 I, Susan C. Riedorph, RPR, CRR certify that I  
8 was authorized to and did stenographically report the  
9 deposition of TERRY GENE BOLLEA; that a review of the  
10 transcript was requested and that the transcript is a  
11 true and complete record of my stenographic notes.12  
13 I further certify that I am not a relative,  
14 employee, attorney, or counsel of any of the parties,  
15 nor am I a relative or employee of any of the parties'  
16 attorney or counsel connected with the action, nor am I  
17 financially interested in the outcome of the foregoing  
18 action.19  
20 Dated this 11th day of March, 2014, IN THE CITY  
21 OF TAMPA, COUNTY OF HILLSBOROUGH, STATE OF FLORIDA.22  
23  
24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36  
37  
38  
39  
40  
41  
42  
43  
44  
45  
46  
47  
48  
49  
50  
51  
52  
53  
54  
55  
56  
57  
58  
59  
60  
61  
62  
63  
64  
65  
66  
67  
68  
69  
70  
71  
72  
73  
74  
75  
76  
77  
78  
79  
80  
81  
82  
83  
84  
85  
86  
87  
88  
89  
90  
91  
92  
93  
94  
95  
96  
97  
98  
99  
100  
101  
102  
103  
104  
105  
106  
107  
108  
109  
110  
111  
112  
113  
114  
115  
116  
117  
118  
119  
120  
121  
122  
123  
124  
125  
126  
127  
128  
129  
130  
131  
132  
133  
134  
135  
136  
137  
138  
139  
140  
141  
142  
143  
144  
145  
146  
147  
148  
149  
150  
151  
152  
153  
154  
155  
156  
157  
158  
159  
160  
161  
162  
163  
164  
165  
166  
167  
168  
169  
170  
171  
172  
173  
174  
175  
176  
177  
178  
179  
180  
181  
182  
183  
184  
185  
186  
187  
188  
189  
190  
191  
192  
193  
194  
195  
196  
197  
198  
199  
200  
201  
202  
203  
204  
205  
206  
207  
208  
209  
210  
211  
212  
213  
214  
215  
216  
217  
218  
219  
220  
221  
222  
223  
224  
225  
226  
227  
228  
229  
230  
231  
232  
233  
234  
235  
236  
237  
238  
239  
240  
241  
242  
243  
244  
245  
246  
247  
248  
249  
250  
251  
252  
253  
254  
255  
256  
257  
258  
259  
260  
261  
262  
263  
264  
265  
266  
267  
268  
269  
270  
271  
272  
273  
274  
275  
276  
277  
278  
279  
280  
281  
282  
283  
284  
285  
286  
287  
288  
289  
290  
291  
292  
293  
294  
295  
296  
297  
298  
299  
300  
301  
302  
303  
304  
305  
306  
307  
308  
309  
310  
311  
312  
313  
314  
315  
316  
317  
318  
319  
320  
321  
322  
323  
324  
325  
326  
327  
328  
329  
330  
331  
332  
333  
334  
335  
336  
337  
338  
339  
340  
341  
342  
343  
344  
345  
346  
347  
348  
349  
350  
351  
352  
353  
354  
355  
356  
357  
358  
359  
360  
361  
362  
363  
364  
365  
366  
367  
368  
369  
370  
371  
372  
373  
374  
375  
376  
377  
378  
379  
380  
381  
382  
383  
384  
385  
386  
387  
388  
389  
390  
391  
392  
393  
394  
395  
396  
397  
398  
399  
400  
401  
402  
403  
404  
405  
406  
407  
408  
409  
410  
411  
412  
413  
414  
415  
416  
417  
418  
419  
420  
421  
422  
423  
424  
425  
426  
427  
428  
429  
430  
431  
432  
433  
434  
435  
436  
437  
438  
439  
440  
441  
442  
443  
444  
445  
446  
447  
448  
449  
450  
451  
452  
453  
454  
455  
456  
457  
458  
459  
460  
461  
462  
463  
464  
465  
466  
467  
468  
469  
470  
471  
472  
473  
474  
475  
476  
477  
478  
479  
480  
481  
482  
483  
484  
485  
486  
487  
488  
489  
490  
491  
492  
493  
494  
495  
496  
497  
498  
499  
500  
501  
502  
503  
504  
505  
506  
507  
508  
509  
510  
511  
512  
513  
514  
515  
516  
517  
518  
519  
520  
521  
522  
523  
524  
525  
526  
527  
528  
529  
530  
531  
532  
533  
534  
535  
536  
537  
538  
539  
540  
541  
542  
543  
544  
545  
546  
547  
548  
549  
550  
551  
552  
553  
554  
555  
556  
557  
558  
559  
560  
561  
562  
563  
564  
565  
566  
567  
568  
569  
570  
571  
572  
573  
574  
575  
576  
577  
578  
579  
580  
581  
582  
583  
584  
585  
586  
587  
588  
589  
590  
591  
592  
593  
594  
595  
596  
597  
598  
599  
600  
601  
602  
603  
604  
605  
606  
607  
608  
609  
610  
611  
612  
613  
614  
615  
616  
617  
618  
619  
620  
621  
622  
623  
624  
625  
626  
627  
628  
629  
630  
631  
632  
633  
634  
635  
636  
637  
638  
639  
640  
641  
642  
643  
644  
645  
646  
647  
648  
649  
650  
651  
652  
653  
654  
655  
656  
657  
658  
659  
660  
661  
662  
663  
664  
665  
666  
667  
668  
669  
670  
671  
672  
673  
674  
675  
676  
677  
678  
679  
680  
681  
682  
683  
684  
685  
686  
687  
688  
689  
690  
691  
692  
693  
694  
695  
696  
697  
698  
699  
700  
701  
702  
703  
704  
705  
706  
707  
708  
709  
710  
711  
712  
713  
714  
715  
716  
717  
718  
719  
720  
721  
722  
723  
724  
725  
726  
727  
728  
729  
730  
731  
732  
733  
734  
735  
736  
737  
738  
739  
740  
741  
742  
743  
744  
745  
746  
747  
748  
749  
750  
751  
752  
753  
754  
755  
756  
757  
758  
759  
760  
761  
762  
763  
764  
765  
766  
767  
768  
769  
770  
771  
772  
773  
774  
775  
776  
777  
778  
779  
780  
781  
782  
783  
784  
785  
786  
787  
788  
789  
790  
791  
792  
793  
794  
795  
796  
797  
798  
799  
800  
801  
802  
803  
804  
805  
806  
807  
808  
809  
810  
811  
812  
813  
814  
815  
816  
817  
818  
819  
820  
821  
822  
823  
824  
825  
826  
827  
828  
829  
830  
831  
832  
833  
834  
835  
836  
837  
838  
839  
840  
841  
842  
843  
844  
845  
846  
847  
848  
849  
850  
851  
852  
853  
854  
855  
856  
857  
858  
859  
860  
861  
862  
863  
864  
865  
866  
867  
868  
869  
870  
871  
872  
873  
874  
875  
876  
877  
878  
879  
880  
881  
882  
883  
884  
885  
886  
887  
888  
889  
890  
891  
892  
893  
894  
895  
896  
897  
898  
899  
900  
901  
902  
903  
904  
905  
906  
907  
908  
909  
910  
911  
912  
913  
914  
915  
916  
917  
918  
919  
920  
921  
922  
923  
924  
925  
926  
927  
928  
929  
930  
931  
932  
933  
934  
935  
936  
937  
938  
939  
940  
941  
942  
943  
944  
945  
946  
947  
948  
949  
950  
951  
952  
953  
954  
955  
956  
957  
958  
959  
960  
961  
962  
963  
964  
965  
966  
967  
968  
969  
970  
971  
972  
973  
974  
975  
976  
977  
978  
979  
980  
981  
982  
983  
984  
985  
986  
987  
988  
989  
990  
991  
992  
993  
994  
995  
996  
997  
998  
999  
1000



IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
OF THE STATE OF FLORIDA, IN AND FOR PINELLAS COUNTY

-----  
TERRY GENE BOLLEA, professionally  
known as HULK HOGAN,

Plaintiff,

No. 12-012447-CI-011

vs.

HEATHER CLEM; GAWKER MEDIA, LLC,  
aka GAWKER MEDIA, et al.,

Defendants.  
-----/

VOLUME 2

CONTINUED VIDEOTAPED

DEPOSITION OF: TERRY GENE BOLLEA

DATE: March 6, 2014

TIME: 1:58 p.m. to 5:47 p.m.

PLACE: Riesdorff Reporting Group  
601 Cleveland Street  
Suite 600  
Clearwater, Florida

PURSUANT TO: Notice by counsel for  
Defendants for purposes of  
discovery, use at trial or  
such other purposes as are  
permitted under the Florida  
Rules of Civil Procedure

REPORTED BY: Susan C. Riesdorff, RPR, CRR  
Notary Public, State of  
Florida

Pages 155 - 311

## 1 APPEARANCES:

2 CHARLES J. HARDER, ESQUIRE  
3 KIMBERLINA MCKINNEY, ESQUIRE  
4 Harder Mirell & Abrams, LLP  
5 1925 Century Park East  
6 Suite 800  
7 Los Angeles, California 90067

8 - and -

9 DAVID R. HOUSTON, ESQUIRE  
10 Law Office of David R. Houston  
11 432 Court Street  
12 Reno, Nevada 89501  
13 Attorneys for Plaintiff  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

## 1 APPEARANCES (continued):

2 SETH D. BERLIN, ESQUIRE  
3 Levine Sullivan Koch & Schulz, LLP  
4 1899 L Street, N.W.  
5 Suite 200  
6 Washington, D.C. 20036

7 - and -

8 MICHAEL BERRY, ESQUIRE  
9 PAUL J. SAFIER, ESQUIRE  
10 Levine Sullivan Koch & Schulz, LLP  
11 1760 Market Street  
12 Suite 1001  
13 Philadelphia, Pennsylvania 19103

14 - and -

15 RACHEL E. FUGATE, ESQUIRE  
16 Thomas & Locicero, P.L.  
17 601 South Boulevard  
18 Tampa, Florida 33606

19 - and -

20 HEATHER DIETRICK, ESQUIRE  
21 General Counsel  
22 Gawker Media  
23 210 Elizabeth Street  
24 Third Floor  
25 New York, New York 10012  
Attorneys for Defendant Gawker Media, LLC

MICHAEL GOLD, ESQUIRE  
Barry A. Cohen Law Group  
201 East Kennedy Boulevard  
Suite 1000  
Tampa, Florida 33602  
Attorney for Defendant Heather Clem

## 22 ALSO PRESENT:

23 Honorable James Case  
24 Mike Byrd, Videographer

1           Earlier you mentioned Hogan's Beach Shop.  
2           What's that?

3           A.    Hogan's Beach Shop, it is a shop on  
4           Mandalay Avenue in Pelican's Plaza.  And it's pretty  
5           much half beach -- beach shop with beach products and  
6           the other half wrestling memorabilia and T-shirts and  
7           stuff.

8           Q.    And when did it open?

9           A.    Well, this January was the one year  
10          anniversary, I think.  Yeah.  It was one year grand --  
11          anniversary of the grand opening.  I think it opened a  
12          little before the 1st, maybe November, October.

13          Q.    Of like 2012 with the sort of January 1st,  
14          2013, being the anniversary that you're talking about?

15          A.    Yes.  Yes.

16          Q.    When did you develop the idea to open a shop?

17          A.    When I was in discussions with my partner in  
18          Hogan's Beach, the restaurant, he said, you know, I've  
19          got a shopping plaza.  He owns a bunch of commercial  
20          property.  He goes, I've got a shopping plaza on  
21          Clearwater Beach.  I'm having a very hard time getting  
22          business in there and it would help me out and it might  
23          help you to have a presence on Clearwater Beach.  And  
24          if you are interested, I would open the space up for  
25          you in the Pelican Plaza.  So that's when the idea

1 first came about.

2 Q. I think you mentioned this earlier, but who  
3 is that partner?

4 A. Ben Mallah.

5 **REDACTED**  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

25 Q. What's Hogan's Beach?



1 Q. That's the thing we talked about earlier with  
2 the Internet hosting service?

3 A. Yes.

4 Q. All right. And when were you approached  
5 about that venture?

6 A. About a year ago.

7 Q. And who approached you?

8 A. Mark Hargrove.

9 Q. And when did the service launch?

10 A. I don't have an exact date. There were a  
11 bunch of glitches in the system and it took months and  
12 months and months. And I am not sure what the hard  
13 date was when it launched or if it has launched yet.

14 Q. Got it.

15 And when they approached you, was there any  
16 discussion of the sex tape that's at issue in this  
17 case?

18 A. I don't recall.

19 **REDACTED**  
20  
21  
22  
23  
24  
25

# REDACTED

1  
2  
3  
4  
5 MR. BERLIN: Got it.

6 Let me show you one more exhibit. This is  
7 also a video. And I'll mark this as Exhibit 81.

8 (Exhibit No. 81 marked for identification.)

9 MR. BERLIN: Give us a minute for the  
10 technology and we'll get started.

11 THE WITNESS: This should be good.

12 (Exhibit No. 81 being published.)

13 BY MR. BERLIN:

14 Q. Do you recognize that exhibit?

15 A. Yes.

16 Q. What is it?

17 A. It is a piece of promotional footage to  
18 promote Hostamania.

19 Q. Was that you in that video?

20 A. One of the people in there is.

21 Q. Which one is you?

22 A. The one on the wrecking ball.

23 Q. Whose idea was this ad?

24 A. Whose idea? Combination of Mark Hargrove and  
25 whatever the producer's name is on the end of the tape,

1 Daniel something.

2 Q. And do you know what it's based on?

3 A. What it's based on?

4 Q. Yes.

5 A. Fun.

6 Q. Do you think it -- does it imitate anything  
7 else?

8 A. It's a parody.

9 Q. Of what?

10 A. Miley Cyrus on a wrecking ball.

11 Q. And you're obviously okay with doing that?

12 **REDACTED**  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

## 1 CERTIFICATE OF OATH

2  
3 STATE OF FLORIDA

4 COUNTY OF HILLSBOROUGH

5  
6 I, the undersigned authority, certify that TERRY  
7 GENE BOLLEA personally appeared before me and was duly  
8 sworn.9  
10 WITNESS my hand and official seal this 11th day of  
11 March, 2014.12  
13  
14 *Susan C. Riedorph*15  
16 Susan C. Riedorph, RPR, CRR, CLSP  
17 Notary Public - State of Florida  
18 My Commission Expires: 6/10/13  
19 Commission No.: DD 891977  
20  
21  
22  
23  
24  
25

## REPORTER'S CERTIFICATE

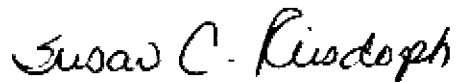
STATE OF FLORIDA :

COUNTY OF HILLSBOROUGH :

I, Susan C. Riesdorph, RPR, CRR certify that I was authorized to and did stenographically report the deposition of TERRY GENE BOLLEA; that a review of the transcript was requested and that the transcript is a true and complete record of my stenographic notes.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the outcome of the foregoing action.

Dated this 11th day of March, 2014, IN THE CITY OF TAMPA, COUNTY OF HILLSBOROUGH, STATE OF FLORIDA.



Susan C. Riesdorph, RPR, CRR, CLSP



IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
IN AND FOR PINELLAS COUNTY, FLORIDA  
CIVIL DIVISION

TERRY GENE BOLLEA,  
professionally known as HULK  
HOGAN,

Plaintiff,

Case No.

12-012447-CI-011

vs.

HEATHER CLEM; GAWKER MEDIA,  
LLC, aka GAWKER MEDIA, et  
al.,

Defendants.

---

CONTINUED  
VIDEOTAPED

DEPOSITION OF: TERRY GENE BOLLEA

DATE: March 7, 2014

TIME: 9:41 a.m. to 12:48 p.m.

PLACE: Riesdorff Reporting Group  
601 Cleveland Street  
Suite 600  
Clearwater, Florida

PURSUANT TO: Notice by counsel for Defendants  
for purposes of discovery, use at  
trial or such other purposes as  
are permitted under the Florida  
Rules of Civil Procedure

REPORTED BY: Aaron T. Perkins, RPR  
Notary Public, State of  
Florida at Large

Volume 3  
Pages 312 to 451

## 1 APPEARANCES:

2 CHARLES J. HARDER, ESQUIRE  
3 KIMBERLINA N. MCKINNEY, ESQUIRE  
4 Harder Mirell & Abrams, LLP  
5 1925 Century Park East  
6 Suite 800  
7 Los Angeles, California 90067

8 - and -

9 DAVID R. HOUSTON, ESQUIRE  
10 Law Office of David R. Houston  
11 432 Court Street  
12 Reno, Nevada 89501

13 Attorneys for Plaintiff  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

CONTINUED:



1 APPEARANCES CONTINUED AS FOLLOWS:  
2

3 MICHAEL BERRY, ESQUIRE  
4 PAUL J. SAFIER, ESQUIRE  
5 Levine Sullivan Koch & Schulz, LLP  
6 1760 Market Street  
7 Suite 1001  
8 Philadelphia, PA 19103

9 - and -

10 SETH D. BERLIN, ESQUIRE  
11 Levine Sullivan Koch & Schulz, LLP  
12 1899 L Street, N.W.  
13 Suite 200  
14 Washington, D.C. 20036

15 - and -

16 GREGG D. THOMAS, ESQUIRE  
17 Thomas & Locicero, PL  
18 601 South Boulevard  
19 Tampa, Florida 33606

20 - and -

21 HEATHER L. DIETRICK, ESQUIRE  
22 General Counsel  
23 Gawker Media  
24 210 Elizabeth Street  
25 Third Floor  
New York, New York 10012

Attorneys for Defendant Gawker Media, LLC,  
et al.

## ALSO PRESENT:

Honorable James Case  
Mike Byrd, videographer

1 **REDACTED**  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12

13 Q. In October 2012, you had a media tour set up  
14 to promote TNA Wrestling; is that right?

15 A. To the best of my recollection, yes.

16 Q. What specific event or events were you  
17 promoting?

18 A. In October, it would have been Bound For  
19 Glory. It was the biggest Pay-per-view that TNA has.  
20 It's their Superbowl for them.

21 Q. It's an annual thing?

22 A. Yes.

23 Q. And were you also promoting something for  
24 Spike Television?

25 A. The Bound For Glory Pay-per-view is something

1 besides Bound For Glory and the Spike television?

2 A. Not that I recall.

3 Q. Would you have been promoting Hogan Beach  
4 Shop?

5 A. I may have mentioned it.

6 Q. Okay. Who set up those media appearances?

7 A. To the best of my recollection, it was this  
8 lady named Jules.

9  
10 **REDACTED**  
11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1 **REDACTED**  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15

16 Q. All right. If I could direct your attention  
17 to the first page of the document, marked Bollea  
18 001060. First page, sorry. Sorry. That's this one.  
19 If I could direct your attention to that.

20 The top line refers to a Jules Wortman. Do  
21 you think that's the Jules you just referred to?

22 A. Yes.

23 **REDACTED**  
24  
25


1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

CERTIFICATE OF OATH

STATE OF FLORIDA  
COUNTY OF HILLSBOROUGH

I, the undersigned authority, certify that  
TERRY GENE BOLLEA, personally appeared before me and  
was duly sworn.

WITNESS my hand and official seal this 14th day  
of March, 2014.

  
\_\_\_\_\_  
Aaron T. Perkins, RPR  
Notary Public - State of Florida  
My Commission Expires: 2/27/2016  
Commission No. EE173286



## 1 REPORTER'S CERTIFICATE

2  
3 STATE OF FLORIDA  
4 COUNTY OF HILLSBOROUGH5 I, Aaron T. Perkins, Registered Professional  
6 Reporter, certify that I was authorized to and did  
7 stenographically report the deposition of  
8 TERRY GENE BOLLEA; that a review of the transcript was  
9 requested; and that the transcript is a true and  
10 complete record of my stenographic notes.11 I further certify that I am not a relative,  
12 employee, attorney, or counsel of any of the parties,  
13 nor am I a relative or employee of any of the parties'  
14 attorney or counsel connected with the action, nor am I  
15 financially interested in the action.16  
17 Dated this 14th day of March, 2014.  
18  
1920  
21   
22 Aaron T. Perkins, RPR  
23  
24  
25

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

SIGNATURE PAGE

PLEASE ATTACH TO THE DEPOSITION OF TERRY GENE BOLLEA  
TAKEN ON MARCH 7, 2014, IN THE CASE OF TERRY GENE  
BOLLEA AND HEATHER CLEM; GAWKER MEDIA, LLC, aka GAWKER  
MEDIA, et al.

PAGE        LINE        CORRECTION AND REASON THEREFOR

I HAVE READ THE FOREGOING PAGES AND, EXCEPT FOR ANY  
CORRECTIONS OR AMENDMENTS INDICATED ABOVE, I HEREBY  
SUBSCRIBE TO THE ACCURACY OF THIS TRANSCRIPT.

\_\_\_\_\_  
TERRY GENE BOLLEA

\_\_\_\_\_  
DATE

\_\_\_\_\_  
WITNESS TO SIGNATURE

\_\_\_\_\_  
DATE