

# **Exhibit G**

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,

vs.

Case No.  
12-012447-CI-011

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

Defendants.

\_\_\_\_\_ /

CONFIDENTIAL

VIDEOTAPED

DEPOSITION OF: HEATHER COLE,  
formerly known as  
HEATHER CLEM

DATE: January 26, 2015

TIME: 10:07 a.m. to 1:59 p.m.

PLACE: Bajo, Cuva, Cohen & Turkel, P.A.  
100 North Tampa Street  
Suite 1900  
Tampa, Florida

PURSUANT TO: Notice by counsel for Defendant  
Gawker Media, LLC, for purposes  
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of Civil Procedure

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

Pages 1 to 125

1           Prior to the third sexual encounter, do you  
2 recall any communications that you had with either  
3 Mr. Clem or with anyone else regarding having sex with  
4 Terry Bollea a third time?

5           A.    No, I do not recall.

6           Q.    What do you recall about the third sexual  
7 encounter that you had with Terry Bollea?

8           A.    That we had sex.

9           Q.    Do you recall anything else during the time  
10 that you had sex -- well, strike that.

11                  Other than the fact that you had sex, do you  
12 recall anything else about the third sexual encounter  
13 with Terry Bollea?

14           A.    No.

15           Q.    Do you recall any communications that you had  
16 with Bubba Clem or Terry Bollea or anyone else after  
17 the third sexual encounter regarding the third sexual  
18 encounter?

19           A.    Yes.

20           Q.    What do you recall?

21           A.    At some point after the encounter at our  
22 house with Mr. Bollea, Mr. Clem showed me a videotape  
23 of myself and Mr. Bollea having sex.

24           Q.    How long did you watch that footage? Was it  
25 a few seconds or a few minutes or the whole thing?

1           A.    I did not watch it.  It was brief.

2           Q.    What was your response to Mr. Clem when he  
3 showed you that?

4           A.    I was upset.

5           Q.    Do you recall what you said to Mr. Clem or  
6 what Mr. Clem said to you?

7           A.    I recall being upset.

8           Q.    Did you shout?

9           A.    I don't recall.

10          Q.    I assume that you had no idea before the  
11 third sexual encounter that it was going to be filmed?

12          A.    Can you ask me that in a question?

13          Q.    Sure.

14                Did you have any idea before the sexual  
15 encounter happened that it was going to be filmed?

16          A.    No.

17          Q.    The first time that you learned of the  
18 filming of any sexual encounter with Terry Bollea was  
19 after the third encounter, correct?

20          A.    Yes.

21          Q.    Did you ever have any communications with  
22 Terry Bollea regarding sex after the third sexual  
23 encounter?

24          A.    Not that I recall.

25          Q.    You never told Terry Bollea that the

1 encounter had been filmed?

2 A. No.

3 Q. To the best of your knowledge, was there only  
4 one sexual encounter that you had with Terry Bollea  
5 that was filmed?

6 A. To the best of my knowledge, yes.

7 Q. To the best of your knowledge, did Bubba Clem  
8 ever tell Terry Bollea that he had been filmed having  
9 sex with you?

10 A. I don't know.

11 Q. Did you ever have any conversations at all  
12 with Terry Bollea regarding the subject of filming of  
13 sex?

14 A. No.

15 Q. The first sexual encounter that you had with  
16 Mr. Bollea at his house, was that in a private bedroom?

17 A. Yes.

18 Q. And was the door closed?

19 A. I don't recall.

20 Q. Was there anyone else who was in the room  
21 besides you and Mr. Bollea?

22 A. Not that I'm aware of.

23 Q. Did you believe it was a private encounter,  
24 the first sexual encounter?

25 A. Yes.

1           Q.    The second sexual encounter at the hotel room  
2           in Tennessee, to your knowledge, it was just you and  
3           Mr. Bollea in the room?

4           A.    Correct.

5           Q.    And was it your understanding that it was a  
6           private sexual encounter just between you and  
7           Mr. Bollea?

8           A.    Yes.

9           Q.    And the third sexual encounter in your  
10          bedroom, it was just you and Mr. Bollea in the room,  
11          correct?

12          A.    To the best of my knowledge.

13          Q.    And to the best of your knowledge, it was a  
14          private sexual encounter between you and Mr. Bollea and  
15          no one else was watching and no one was filming it,  
16          correct?

17          A.    Can you restate the question, please?

18          Q.    Sure.

19                The third sexual encounter that you had with  
20          Mr. Bollea, to the best of your knowledge at the time  
21          of the encounter, it was a private encounter between  
22          you and Mr. Bollea and, to your knowledge, nobody was  
23          watching and nobody was filming?

24          A.    Correct.

25          Q.    After the third sexual encounter, did