

Exhibit I

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.

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VOLUME 1

VIDEOTAPED
DEPOSITION OF:

TERRY GENE BOLLEA

DATE:

March 6, 2014

TIME:

9:43 a.m. to 1:06 p.m.

PLACE:

Riesdorph 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. Riesdorph, RPR, CRR
Notary Public, State of
Florida

Pages 1 - 154

1 cameras in the studio?

2 A. No.

3 Q. Or in the radio station?

4 A. No.

5 Q. Just so we're clear, the Ruth McGillicuddy
6 that's referred to in the clip is who?

7 A. It's my mother.

8 MR. BERLIN: Let me have the next exhibit, if
9 I could, please.

10 Let me show you what I'm going to mark as
11 Exhibit 84.

12 (Exhibit No. 84 marked for identification.)

13 BY MR. BERLIN:

14 Q. Take a look at that, please. And you're free
15 to look at the whole thing. I'm going to ask you about
16 this, but I'm going to start at the bottom of the first
17 page and the portion that begins, Hogan on the release
18 of the sex tape, and then continue right on to the next
19 page.

20 Do you know what this is?

21 A. No, I don't.

22 Q. Reading that report of an appearance you gave
23 on a Sirius show called Busted Open -- did you appear
24 on a Sirius show called Busted Open?

25 A. I don't recall. I'm sure I did if I was on

1 there.

2 Q. And --

3 MR. HARDER: Move to strike after "I don't
4 recall."

5 BY MR. BERLIN:

6 Q. Do you have any reason to doubt that you were
7 on this program?

8 A. I don't know. I've had -- done so many
9 interviews, I would have to hear myself on it to make
10 sure I was on it.

11 Q. Fair enough.

12 Have you had a chance to read the portion
13 that I pointed out starting at the bottom of the first
14 page and continuing on to the second page?

15 A. Almost.

16 Q. Why don't you go ahead and finish and then
17 I'll ask you my question.

18 A. Yeah, I've read it.

19 Q. All right. If I can direct your attention on
20 page 2 to just the middle.

21 A. Yes, sir.

22 Q. And the block there that's there, and let me
23 see if I can point to where I'm going to read from. It
24 should be -- pardon me. Let's turn it sideways and
25 I'll give this back to you.

1 MR. HARDER: Is it okay if he puts a pencil
2 mark on it?

3 MR. BERLIN: Yeah, absolutely. He can put a
4 pencil mark or I can put a pencil mark. I'm just
5 going to mark where I'm going to start reading.

6 THE WITNESS: Cool.

7 BY MR. BERLIN:

8 Q. All right. So you can see it.

9 I'm in the middle of the paragraph where it
10 says -- picks up, because I made a bad choice. And the
11 thing that is so disturbing to me is that I have been
12 defending Bubba across the board because I asked him,
13 where did the camera come from? I even asked you,
14 because you know -- because I know you have security
15 cameras in your house, you're not filming this, are
16 you?

17 He was like, no, I would never do that to
18 you. How dare you insult me.

19 When the pictures came out, I said what's up?
20 This was on your watch.

21 And he said, oh, it must have been Heather
22 that did it. It's crazy, dude. You've got to stop
23 this.

24 Let me just ask you about that. Did you say
25 this?

1 A. I don't recall saying this. And if I did,
2 you can immediately see I misspoke, because I asked
3 him, where did the cameras come from? And then later
4 on in the article, if I said this, I -- I also said, I
5 did not know the cameras were there. So I must have
6 misspoke during the interview. I was so riled.

7 Q. So for this purpose, it doesn't refresh your
8 recollection of having any conversation with Bubba
9 about there being cameras in his house?

10 A. No. I don't remember this article at all.

11 Q. All right.

12 MR. HARDER: The document lacks foundation.

13 MR. BERLIN: There's no question pending.

14 MR. HARDER: I'm just making an objection.

15 BY MR. BERLIN:

16 Q. During what years was your divorce being
17 litigated?

18 A. It was being litigated, meaning going to --
19 what years was I going through the divorce?

20 Q. Yes.

21 A. She filed in November of '07, and it went on
22 for about three and a half to four years.

23 Q. And you spoke publicly about that being a low
24 point in your life?

25 A. Yes.