

EXHIBIT 15

CIRCUIT COURT
SIXTH JUDICIAL CIRCUIT
PINELLAS COUNTY, FLORIDA

TERRY GENE BOLLEA, Professionally
known as HULK HOGAN,

Plaintiff,

CASE NO. 12-01247-CI-011

vs.

HEATHER CLEM a/k/a Heather Cole, an
Individual, and BUBBA THE LOVE
SPONGE CLEM a/k/a Todd Alan Clem,

Defendants.

_____ /

**DEFENDANT, HEATHER CLEM/COLE'S
NOTICE OF SERVING ANSWERS TO
PLAINTIFF, TERRY GENE BOLLEA'S
FIRST SET OF INTERROGATORIES**

Defendant, HEATHER CLEM / COLE, by and through the undersigned attorney, files
this her Answers to Plaintiff, TERRY GENE BOLLEA's, First set of Interrogatories attached
hereto, served under certificate of service dated July 18, 2013.

of privilege, and you should state the nature of the privilege claimed and specify the grounds relied upon for the claim of privilege.

(w) A separate answer shall be furnished for each interrogatory.

INTERROGATORIES

(If answering for another PERSON or ENTITY, answer with respect to that PERSON or ENTITY, unless otherwise stated.)

1. IDENTIFY each PERSON or ENTITY who knew of the existence of the VIDEO prior to the initial publication of the WEBPAGE.

SEE ATTACHED

2. IDENTIFY each PERSON other than BUBBA CLEM who was recorded engaging in sexual conduct with YOU during the time that YOU were married to BUBBA CLEM, and STATE ALL FACTS that RELATE TO whether each such PERSON consented to the RECORDING and/or the dissemination of the RECORDING.

SEE ATTACHED

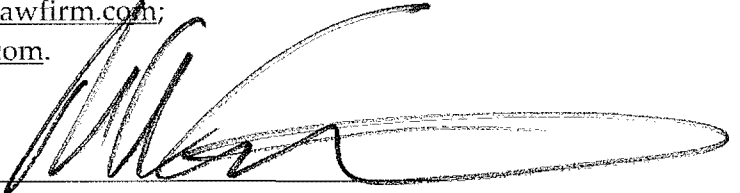
DEFENDANT, HEATHER CLEM / COLE'S
ANSWERS TO PLAINTIFF, TERRY GENE BOLLEA'S, FIRST SET OF INTERROGATORIES

1. Myself, Heather Clem / Cole, Terry Gene Bollea, and Todd Alan Clem.
2. It has happened, however, I cannot remember who with.
3. Unknown.
4. None.
5. None as to myself, Heather Clem / Cole.
6. I do not recall.
7. None known.
8. There was no intent to sell or license the video. It was created and intended for personal private use.
9. Unknown.
10. Unaware of any documents.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy has been served via electronic mail to:
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Date: 9/19/13



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