

# EXHIBIT 14

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

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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

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APPEARANCES:

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Attorneys for Plaintiff

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9 PAUL J. SAFIER, ESQUIRE  
10 Levine Sullivan Koch & Schulz, LLP  
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13 Philadelphia, Pennsylvania 19103

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15 RACHEL E. FUGATE, ESQUIRE  
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18 Tampa, Florida 33606

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20 HEATHER DIETRICK, ESQUIRE  
21 General Counsel  
22 Gawker Media  
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Attorneys for Defendant Gawker Media, LLC

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

ALSO PRESENT:

Honorable James Case  
Mike Byrd, Videographer

1 Q. Do you keep a calendar?

2 A. I keep a paper calendar.

3 Q. And how far back have you done that?

4 A. I started keeping a calendar when I started  
5 wrestling. Probably about '77, I started keeping a  
6 paper calendar and still do to this day.

7 Q. And do you keep old calendars?

8 A. No.

9 Q. So at the end of the year --

10 A. Yeah.

11 Q. So for, let's say, 2012, you would have had a  
12 calendar for 2012?

13 A. Yes, sir.

14 Q. And then sometime in the first, let's say,  
15 month of 2013, you would have gotten rid of it?

16 A. Yeah, around that time.

17 Q. And the same for 2013? You would have had a  
18 paper calendar and would have gotten rid of it in the  
19 first part of 2014?

20 A. Uh-huh.

21 Q. And you currently --

22 A. Yes. Sorry.

23 Q. Thank you.

24 And you have -- and you currently are keeping  
25 a calendar, have a calendar, a paper calendar, for

1 MR. BERLIN: Can you read it back, please?

2 (The reporter read the pending question.)

3 THE WITNESS: Not that I can recall.

4 BY MR. BERLIN:

5 Q. How about any related to any public  
6 appearances or interviews in which you discussed the  
7 sex tape?

8 A. I misspoke. Can I re-answer that?

9 Q. Yeah, please.

10 A. I sent my attorneys a bunch of texts, and  
11 I've also sent my attorneys -- every time something  
12 comes up on Twitter about the sex tape or something,  
13 because I don't deal with the negative stuff, you know,  
14 on a consistent basis. I deal with it and I bracket it  
15 and go back to where my heart's at. Anything like that  
16 that -- a text that I would send to my attorneys, as  
17 soon as I send it, I would erase it once I knew they  
18 had it.

19 Q. So a text that came that dealt with this, you  
20 may have sent to your attorneys; a tweet that dealt  
21 with this, you might have sent to your attorneys?

22 A. Oh, I know I did.

23 Q. You did? And how about, have you deleted any  
24 texts of this -- e-mails or texts. I'll come back to  
25 tweets in a moment -- but e-mails or texts related to

1 Q. In responding to documents -- document  
2 requests in this case, did you consult with your  
3 publicist?

4 A. No.

5 Q. In responding to document requests in this  
6 case, did you consult with Mr. Bischoff?

7 A. No.

8 Q. When you were responding to document requests  
9 in this case, did you look at your e-mail account?

10 A. No.

11 Q. When you were responding to document requests  
12 in this case, did you look at your texts?

13 A. No.

14 MR. HARDER: Wait. Asked and answered.

15 BY MR. BERLIN:

16 Q. Did you search your Twitter account when you  
17 were responding to document requests in this case?

18 A. No.

19 MR. HARDER: I -- I think it's --

20 BY MR. BERLIN:

21 Q. Did you search for private messages on  
22 Twitter?

23 A. I don't know what private messages are on  
24 Twitter.

25 Q. Okay. So I take it that the answer is no.

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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



## REPORTER'S CERTIFICATE

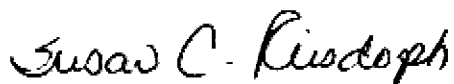
STATE OF FLORIDA :

COUNTY OF HILLSBOROUGH :

I, Susan C. Riedorph, 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. Riedorph, RPR, CRR, CLSP

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

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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  
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permitted under the Florida  
Rules of Civil Procedure

REPORTED BY: Susan C. Riesdorff, RPR, CRR  
Notary Public, State of  
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Pages 155 - 311

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13 Attorneys for Plaintiff  
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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 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.



1           Q. All right. That says, "Subject to and  
2 without waiver of the objections, responding party does  
3 not remember the exact number of sexual encounters with  
4 Heather Clem. To the best of responding party's  
5 recollection, there were at least two and possibly  
6 three sexual encounters with Heather Clem in her  
7 private bedroom at the Clems' residence and one brief  
8 sexual encounter with Heather Clem at the radio station  
9 of Todd Clem's radio program. To the best of  
10 responding party's recollection, these encounters all  
11 occurred in approximately late spring or early summer  
12 of 2007, after responding party had separated from his  
13 wife."

14                   Is this still your recollection about how  
15 many times you had sex with Heather?

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

17           Q. Did all of the sexual encounters take place  
18 in close proximity time-wise to each other?

19           A. What would you call close proximity?

20           Q. Well, let me ask you that. How far apart  
21 were they?

22           A. I seem to remember one encounter was four or  
23 five days apart from another one. And then another  
24 encounter was like two weeks apart. So it varied.

25           Q. And do you know when exactly they occurred?

1 A. No, I don't.

2 Q. Is there anything that you could consult,  
3 like a calendar, to find out?

4 A. They happened before I met Jennifer and  
5 before my son's accident. As far as a calendar, I  
6 don't have stars or dates written down of when I had  
7 encounters with Heather.

8 Q. And was the first time that this happened in  
9 the Clems' bedroom or at the radio station?

10 A. In their bedroom.

11 Q. In the bedroom.

12 Was the radio station the last one or  
13 somewhere in the middle?

14 A. To the best of my recollection, it was the  
15 last one.

16 Q. All right. And do you know how much longer  
17 after the last time in the bedroom the one at the radio  
18 station was?

19 A. No, I don't.

20 Q. But is it still sort of in the neighborhood  
21 of a week or two, not --

22 A. Yes.

23 Q. As opposed to a month or two?

24 A. Yes.

25 Q. All right. And so if we're talking about --

1           A.    It was a situation where Bubba left me in the  
2 room and Heather performed oral sex on me.

3           Q.    Was anybody else at the radio station when  
4 that took place?

5           A.    To the best of my knowledge, no, but I didn't  
6 check around.  It was real late at night.  I mean -- I  
7 mean, it wasn't at nine o'clock at night.  It was more  
8 like midnight or 1:00 or 2:00 in the morning.

9           Q.    Do you know whether that encounter was  
10 filmed?

11          A.    I have no idea.

12          Q.    Do you know whether the other encounters in  
13 the bedroom were filmed?

14          A.    I have no idea.

15          Q.    Did you ever tell anybody else about your  
16 sexual encounters with Mrs. Clem?

17          A.    Not that I can recall.

18          Q.    Whether in the bedroom or at the radio  
19 station?

20          A.    Not that I can recall.

21          Q.    Did anybody ever talk to you about it?

22          A.    No.

23          Q.    So nobody -- you didn't get the sense from  
24 something anybody said to you that either Bubba or  
25 Heather had told anybody else?

1 the words under perjury of law, whatever you said. I  
2 thought you were trying to say why would you get the  
3 date wrong when you could be lying or persecuted or  
4 whatever you're trying to infer. I didn't understand  
5 it.

6 But I keep trying to explain to you over and  
7 over and over again that I'm not real good with dates  
8 unless you give me book -- bookends of moments that  
9 happened that will make me think closer to the right  
10 time frame.

11 Q. Just so I understand, as you sit here now, is  
12 it your best understanding that when these sexual  
13 encounters with Mrs. Clem happened were in the late  
14 spring and early summer of 2007?

15 A. About.

16 Q. About?

17 A. Yes.

18 Q. That's realizing that -- and accepting what  
19 you've said about your -- that dates aren't your  
20 strength --

21 A. Well, I know --

22 Q. -- that's -- that's sort of your best  
23 understanding at this point?

24 A. Yes. And I know they were before the  
25 accident. And I know they were before I started dating

1 my new wife, Jennifer. I know that for sure.

2 So if we can place it before that, that would  
3 be more accurate than saying about 2008.

4 Q. And in that time frame, you were still  
5 married to Linda?

6 A. Yes.

7 Q. And she filed for divorce in, I think you  
8 said, November 2007?

9 A. Yes.

10 Q. Had you at that point told Linda you were  
11 leaving her?

12 A. She had already left me.

13 Q. But she told you that she was leaving you?

14 A. No. She just left. She -- she told me the  
15 marriage was over.

16 MR. HARDER: Wait. Wait. We're getting into  
17 marital, spousal privilege.

18 THE WITNESS: Okay.

19 MR. HARDER: So if we could just lay out the  
20 information without the communications, I think  
21 that would be best.

22 BY MR. BERLIN:

23 Q. Did you understand that -- did you understand  
24 that Linda was no longer wanting to be married to you?

25 A. Yes. She made it quite obvious to me that

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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

## REPORTER'S CERTIFICATE

1  
2  
3 STATE OF FLORIDA :

4 COUNTY OF HILLSBOROUGH :

5  
6  
7 I, Susan C. Riesdorff, 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  
*Susan C. Riesdorff*

Susan C. Riesdorff, 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.

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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:

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14 Attorneys for Plaintiff

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18 CONTINUED:

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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 like a -- the feeling was an overriding negative  
2 feeling that kind of like kept me from being myself or  
3 carrying on the way I would normal carry on.  
4 Everything had a -- it was almost like a death threat,  
5 an overriding death threat that, okay, your world can  
6 end at any moment.

7 Q. When did you first learn that someone was  
8 shopping a sex tape involving you?

9 MR. HARDER: Lacks foundation. Assumes facts  
10 not in evidence.

11 THE WITNESS: That's something I can't talk  
12 about. It's from one of my attorneys.

13 BY MR. BERLIN:

14 Q. When was the first time, other than from one  
15 of your attorneys, that you learned that someone was  
16 shopping a sex tape involving you?

17 MR. HARDER: Lacks foundation. Assumes facts  
18 not in evidence.

19 THE WITNESS: After I received the original  
20 information, which is confidential, there were --  
21 I don't know if it was a Twitter or -- I don't  
22 know if it was TMZ. I'm not -- I don't recall  
23 completely, but the theme was Vivid wanted to do a  
24 deal with me, and there was another porno company  
25 that said they had an open checkbook for me if I

1           wanted to get in that business.

2 BY MR. BERLIN:

3           Q.    At the beginning of your answer, you referred  
4 to information that was confidential. Is that  
5 confidential because it's stuff that you learned from  
6 your attorney?

7           A.    Yes, sir.

8           Q.    All right. Did anyone try to sell the sex  
9 tape back to you?

10          A.    No one tried to sell it back to me.

11          Q.    Did anybody -- did anybody contact you to  
12 offer you the sex tape?

13          A.    No.

14          Q.    Did anybody contact someone on your behalf to  
15 offer you the sex tape?

16                MR. HARDER: I'm just going to advise you  
17 that if this involves a communication with one of  
18 your attorneys, it's privileged.

19                THE WITNESS: It's privileged.

20 BY MR. BERLIN:

21          Q.    All right. Let me go to the next exhibit,  
22 which is a video exhibit. I will mark that No. 88.

23                (Exhibit No. 88 was marked for  
24 identification.)

25          MR. BERLIN: Did you get a copy?

1 whether it's a rumor or fact, usually the bottom  
2 feeders and the vultures usually all group together.  
3 So sometimes it's just the sequence of events, because  
4 like attracts like. Usually, if there is anything  
5 negative or anything positive, those same type of  
6 people usually ban together to spread the news.

7 Q. Did you know at that time in March 2012  
8 whether, in fact, the sex tape of you was being shopped  
9 around?

10 A. I don't recall.

11 Q. Do you know if at any time there was a sex  
12 tape of you being shopped around?

13 MR. HARDER: Calls for speculation.

14 THE WITNESS: I don't know for sure if there  
15 was even a tape at that time.

16 BY MR. BERLIN:

17 Q. I'm not asking at that time. I'm asking at  
18 any time were you aware of there being a sex tape of  
19 you being shopped around?

20 MR. HARDER: Calls for speculation.

21 THE WITNESS: No, not -- not that I know of.

22 BY MR. BERLIN:

23 Q. And are you aware at any time of somebody  
24 trying to offer you the sex tape or a sex tape of you?

25 MR. HARDER: Asked and answered. And if it's

1 through communications with counsel, you cannot  
2 answer.

3 THE WITNESS: Can you repeat the question?

4 MR. BERLIN: Can you read it back again,  
5 please?

6 (A portion of the record was read by the  
7 reporter.)

8 THE WITNESS: That's privileged.

9 BY MR. BERLIN:

10 Q. I don't think the fact of whether someone  
11 offered you the sex tape is privileged. I think you  
12 should not tell me about any communications you had  
13 with your lawyer. But if someone offered you the sex  
14 tape, I don't think that's privileged.

15 A. If the communications came through my lawyer,  
16 that's not privileged?

17 Q. I don't think that's privileged, sir, but we  
18 have --

19 JUDGE CASE: I think if the only way he  
20 learned about this is through his counsel, then it  
21 is privileged.

22 MR. BERLIN: The fact would not be  
23 privileged. The communication would be  
24 privileged.

25 JUDGE CASE: Well, you're asking him to


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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.  
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1920  
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22 Aaron T. Perkins, RPR  
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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.

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CONTINUED  
VIDEOTAPED

DEPOSITION OF: TERRY GENE BOLLEA

DATE: March 7, 2014

TIME: 1:50 p.m. to 5:55 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 4  
Pages 452 to 623

1 APPEARANCES:

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14 Attorneys for Plaintiff

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18 CONTINUED:

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1 APPEARANCES CONTINUED AS FOLLOWS:  
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23 Gawker Media  
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Attorneys for Defendant Gawker Media, LLC,  
et al.

ALSO PRESENT:

Honorable James Case  
Mike Byrd, videographer

1 A. VD?

2 Q. VD, where it said -- right here, VD, where it  
3 says associate of KD. You see where I'm pointing?

4 A. Yes.

5 Q. Okay. And, again, I have the same question.  
6 Outside of anything your attorneys ever told you and  
7 outside of anything that you learned in connection with  
8 a law enforcement investigation, do you know who VD is?

9 A. No.

10 Q. Have you ever heard the name Vilma Duarte?

11 A. No.

12 Q. Without telling me their contents, have you  
13 ever seen any documents pertaining to the FBI's  
14 criminal investigation?

15 MR. HARDER: I'm going to object. It's  
16 privileged.

17 MR. BERLIN: Again, the privilege would be  
18 the FBI privilege -- I mean, the law enforcement  
19 privilege that you're asserting?

20 MR. HARDER: That, and also attorney-client  
21 privilege, both.

22 JUDGE CASE: I think the way the question was  
23 phrased, I respectfully disagree with you. It's a  
24 yes or no question. Have you seen any documents  
25 relating --

1 MR. HARDER: Okay.

2 JUDGE CASE: I mean, that's --

3 MR. HARDER: Okay.

4 MR. BERLIN: That's not any different than  
5 asking, Have you spoken with your attorney? which  
6 you can answer, even if you say tell me what the  
7 communications are.

8 JUDGE CASE: Right.

9 THE WITNESS: Would you repeat the question,  
10 please?

11 MR. BERLIN: Would you read it back? I liked  
12 the way I phrased it.

13 (A portion of the record was read by the  
14 reporter.)

15 THE WITNESS: No.

16 BY MR. BERLIN:

17 Q. Have you ever heard the name Sarah Sweeney  
18 before?

19 A. Not that I can recall.

20 Q. Have you ever heard the name Robert -- Robert  
21 Masochowski before?

22 MR. HARDER: And, again, outside of the  
23 criminal investigation, outside of communications  
24 with your counsel.

25 THE WITNESS: I don't recall hearing the name

1           anywhere.

2                   MR. HARDER: That's fine.

3 BY MR. BERLIN:

4           Q. Other than suing Gawker, Heather Clem, and  
5 initially suing Bubba Clem, what have you done to find  
6 out who was responsible for disseminating the sex tape  
7 of you?

8                   MR. HARDER: And I'm going to instruct you  
9 that if you have learned of anything from your  
10 communications with counsel, don't answer as to  
11 that information.

12                   THE WITNESS: That's privileged.

13 BY MR. BERLIN:

14           Q. So there is nothing that you know on that  
15 subject outside of what you have had in discussions  
16 with your lawyer?

17           A. And what I have heard here in the depositions  
18 the last couple days.

19           Q. You mean your deposition or Mr. Clem's  
20 deposition?

21           A. Mr. Clem's deposition.

22           Q. What did you learn in Mr. Clem's deposition  
23 that would help you find out who was responsible for  
24 disseminating the sex tape?

25                   MR. HARDER: Calls for a narrative.


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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



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REPORTER'S CERTIFICATE

STATE OF FLORIDA  
COUNTY OF HILLSBOROUGH

I, Aaron T. Perkins, Registered Professional Reporter, 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 action.

Dated this 14th day of March, 2014.

  
\_\_\_\_\_  
Aaron T. Perkins, RPR