

EXHIBIT A

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: BUBBA THE LOVE SPONGE CLEM

DATE: March 3, 2014

TIME: 3:21 p.m. to 6:02 p.m.

PLACE: Thomas & LoCicero, P.L.
601 South Boulevard
Tampa, 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 2
Pages 183 to 345

1 THE VIDEOGRAPHER: Off the record at 5:36.

2 (A recess was taken.)

3 THE VIDEOGRAPHER: On the record at 5:39.

4 BY MR. BERRY:

5 Q. When was the first time that Heather and Hulk
6 had sex?

7 A. Well, the first and only time was that time
8 that you guys have the videotape of.

9 Q. Do you recall what year that was?

10 A. No.

11 Q. And had they had any sexual contact before
12 that?

13 A. No, not -- not -- I don't think so.

14 Q. And so if I understand the chronology, you
15 mentioned this to Hulk, and then at some point -- at
16 some point shortly thereafter, they had sex?

17 A. Yes.

18 Q. And as far as you know, they only had sex one
19 time?

20 A. Yes.

21 Q. Do you know, just roughly, what year this
22 was?

23 A. No.

24 Q. Do you know whether they ever had any sexual
25 encounter at the radio station where you worked?

1 A. No.

2 Q. After they had sex that one time, did you and
3 Hulk ever discuss them having sex?

4 A. I don't think so.

5 Q. It never came up?

6 A. My answer is I don't think so.

7 Q. But as far as you recall, you don't -- they
8 never --

9 A. I don't think so.

10 Q. Did you and Heather ever discuss them having
11 sex?

12 MR. GOLD: Objection. Marital privilege.

13 MR. DIACO: Join.

14 BY MR. BERRY:

15 Q. Before 2012, did you discuss the fact that
16 Hulk and Heather had had sex with anybody else?

17 A. I don't think so.

18 Q. Before 2012, as far as you know, did anybody
19 else other than you, Hulk, and Heather, know that they
20 had had sex?

21 A. I don't think so.

22 Q. Did Heather having sex with Hulk change your
23 relationship with him?

24 A. No, I don't think so.

25 Q. Everything just continued as normal?

1 A. I think so, yeah.

2 Q. There was nothing awkward about it?

3 A. Uh-uh (Indicates negatively). Other than I
4 knew in the back of my mind that I had wronged him.

5 Q. But just relate -- you mean as far as the
6 recording?

7 A. Yes.

8 Q. So you had -- when was the -- did you realize
9 that you had recorded him?

10 A. Well, I knew, obviously, when it happened. I
11 knew -- I knew that I had surveillance.

12 Q. Okay. Before the existence of that tape was
13 reported, did you discuss the fact that Hulk and
14 Heather had had sex with anybody else?

15 A. I don't think so.

16 Q. Do you know if she did?

17 A. I can't speculate as to what she did. I
18 don't think she did.

19 Q. Do you know if Hulk did?

20 A. I can't speculate, but I would assume no.

21 Q. But as far as you know, he didn't?

22 A. I would assume no.

23 Q. When you and Heather were getting divorced,
24 did you and Hulk talk about the fact that he had sex
25 with Heather?