

EXHIBIT E

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: 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

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1 there was a sex tape -- and when you use the word
2 "told" or "told to me" it's just -- it's a rumor,
3 because I don't know if it's true when somebody
4 tells you something.

5 It made me sick. It pretty much put the
6 brakes on everything I was doing, not only
7 emotionally, but business-wise. Everything was
8 book-ended by having to address the subject on a
9 constant basis, 24 hours a day, even to the point
10 of when I would meet someone, whether it be a
11 father or son or a daughter or mother, mentally,
12 as I shook their hand and looked at them and told
13 them it's nice to meet you and thanks for being a
14 fan and I love you too, thanks for being so loyal,
15 no matter what it was, in the back of my mind it
16 just -- there was this overriding negative feeling
17 of, If there is a sex tape, have they seen it, and
18 what do they think of me?

19 BY MR. BERLIN:

20 Q. Are you aware of any other media reports in
21 this March 2012 timeframe about the possibility of a
22 sex tape involving you?

23 A. None that I can recall.

24 Q. Do you think there were others?

25 A. Usually, when the negative press starts,

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

1 divulge what the conclusion was as a result of his
2 conversation with his counsel.

3 THE WITNESS: You're trying to trip me up,
4 aren't you?

5 BY MR. BERLIN:

6 Q. I'm not. I'm just -- this is a --

7 A. You are.

8 Q. I am not.

9 A. You are.

10 Q. And that's why we have --

11 A. Now you're lying.

12 MR. HARDER: Terry.

13 BY MR. BERLIN:

14 Q. I am not, sir. This is why we have a judge
15 here to give his wisdom on whether these questions are
16 proper, and then we follow it.

17 After the initial report, this report here in
18 March of 2012 about the sex tape came out, did you
19 discuss this topic with Mr. Clem?

20 A. I don't recall.

21 MR. HARDER: My objection is asked and
22 answered yesterday.

23 THE WITNESS: The final communication I had
24 with Mr. Clem was through texts that we talked
25 about yesterday. And right before those texts, a