

# EXHIBIT F

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           Did you ever talk to Bubba -- other than  
2 talking to Bubba -- that was first set of questions.  
3 Other than talking to Bubba, did you ever have any  
4 communications with Bubba in other -- any other way,  
5 e-mail, text, whatever, about any efforts to get law  
6 enforcement involved in investigating how this  
7 happened?

8           A. I already told you several times I don't do  
9 e-mail.

10          Q. Fair enough.

11          A. But I don't recall any talks with him about  
12 getting law enforcement involved.

13          Q. In October 2012, you had a media tour set up  
14 to promote TNA Wrestling; is that right?

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

16          Q. What specific event or events were you  
17 promoting?

18          A. In October, it would have been Bound For  
19 Glory. It was the biggest Pay-per-view that TNA has.  
20 It's their Superbowl for them.

21          Q. It's an annual thing?

22          A. Yes.

23          Q. And were you also promoting something for  
24 Spike Television?

25          A. The Bound For Glory Pay-per-view is something

1 that's predictable, because it's the same time every  
2 year, so they set up the media tour at the same time  
3 every year. And I had been told to always plug Spike  
4 whenever I talked about TNA or any Pay-per-view in the  
5 same train of thought. They always wanted me to  
6 promote Spike, the network.

7 Q. And was there some -- there was a wrestling  
8 connection with Spike, the network?

9 A. Yes, sir.

10 Q. What is that?

11 A. TNA is on Spike, the network. The wrestling  
12 company show is on Spike.

13 Q. On Spike.

14 All right. And had you -- is the Bound For  
15 Glory sort of comparable to WrestleMania?

16 A. No.

17 Q. How are they different?

18 A. Bound For Glory, in scale, probably would do  
19 20- or 30,000 buys and WrestleMania does over a million  
20 easily. They're not -- it's like comparing a tricycle  
21 to NASCAR.

22 Q. Have you participated in promoting Bound For  
23 Glory in prior years?

24 A. Yes.

25 Q. How many times?

1           A.    Oh, boy.  I have been there four times, four  
2 years, so I had either promoted it three or four times.

3           Q.    Do you know what media outlets you appeared  
4 on in those prior years?

5           A.    It's pretty much the same media.  It's  
6 usually the Howard Stern and Today Show and Fox and  
7 Friends.  And usually when Regis was in town, on the  
8 air, I would do Regis, because I was good friends with  
9 him and Imus.  It was pretty much the same -- the same  
10 media outlets, because TNA is kind of limited on who  
11 they can -- who they have access to, and so I used my  
12 resources.

13                    But I didn't want to -- I know the  
14 boundaries, you know, like if I'm going to promote a  
15 movie or something, I will go on the Jay Leno Show.  
16 But TNA isn't big enough.  And instead of asking Jay  
17 Leno -- that's kind of like your down card that you can  
18 use once a year, so you don't want to go promote a TNA  
19 show on Jay Leno when you can promote cancer awareness  
20 or Make-A-Wish or something big like a TV series or a  
21 movie.  So the -- the -- what I'm trying to say is the  
22 Bound For Glory media is limited to pretty much the  
23 same thing every year.

24           Q.    In the 2012 year, just turning back to that  
25 one, were you promoting anything else on that tour

1 besides Bound For Glory and the Spike television?

2 A. Not that I recall.

3 Q. Would you have been promoting Hogan Beach  
4 Shop?

5 A. I may have mentioned it.

6 Q. Okay. Who set up those media appearances?

7 A. To the best of my recollection, it was this  
8 lady named Jules.

9 Q. I think we talked about her yesterday.

10 A. Right, that worked at TNA. And she possibly  
11 may have had help with Elizabeth Rosenthal, but I'm not  
12 sure of that.

13 Q. Do you know when the tour was -- like how far  
14 in advance that tour would have been scheduled?

15 A. It's a yearly thing, so they have it  
16 scheduled for the next year. It's not a tour; it's  
17 just one night.

18 Q. No. I'm asking the media tour, how much --

19 A. The media tour, that's scheduled -- it's a  
20 yearly thing, so, I mean, like next year, Bound For  
21 Glory 2015, they know that you want a media tour a week  
22 or two before. They already have those plans.

23 Q. So sometime well in advance they start making  
24 those plans?

25 A. Oh, yes, of course.

1 Q. Do you know how many appearances in 2012 you  
2 were planning to do?

3 A. Four.

4 Q. Four in that -- for the Bound For Glory media  
5 tour?

6 MR. HARDER: Vague as to time.

7 THE WITNESS: I don't recall how many I had  
8 planned on. I pretty much tell them I will do  
9 anything to help you. I don't really plan it, so  
10 if they say you're going to New York on Monday and  
11 Tuesday, and L.A. on Thursday and Friday -- since  
12 I'm there, instead of just doing Howard Stern or  
13 the Today Show, since I'm there, if there is stuff  
14 that makes sense and you can get me on Sirius or  
15 any XM satellite stuff. I'm there to work so I  
16 would rather work. So it just -- I don't know  
17 what the question was now. I can't remember.

18 BY MR. BERLIN:

19 Q. I was just asking you how many appearances  
20 you were planning to do on that tour.

21 A. Okay. I planned to do as many as they asked  
22 me to do.

23 Q. Let me show you, if I could, what I'm going  
24 to mark as Exhibit 91, which is a series of documents  
25 produced to us in discovery, marked Bollea 001060

1 through Bollea 001067.

2 (Exhibit No. 91 was marked for  
3 identification.)

4 BY MR. BERLIN:

5 Q. Take a look at that, if you would, please.

6 MR. HARDER: Take your time.

7 BY MR. BERLIN:

8 Q. You should feel free to read all of this.  
9 But I'm not going to ask you any questions at all about  
10 the last two pages, if that makes a difference.

11 A. The last two pages?

12 Q. Yeah. I'm going to ask only questions about  
13 things besides the last two pages, so you can skip  
14 those if you would like.

15 A. Okay.

16 Q. All right. If I could direct your attention  
17 to the first page of the document, marked Bollea  
18 001060. First page, sorry. Sorry. That's this one.  
19 If I could direct your attention to that.

20 The top line refers to a Jules Wortman. Do  
21 you think that's the Jules you just referred to?

22 A. Yes.

23 Q. All right. And in the first line, again it  
24 has her e-mail, jwortman@wortmanworks.com.

25 Do you know what wortmanworks.com is?



1 A. No idea.

2 Q. Okay. Then if you go below the line, there  
3 is a horizontal line. It says, From Jules Wortman, and  
4 then it has a different e-mail address,  
5 jwortman@tnawrestling.com.

6 TNA Wrestling is the outfit that we just  
7 talked about?

8 A. Yes.

9 Q. And you understood that she worked for TNA  
10 Wrestling?

11 A. Yes.

12 Q. All right. And this comes to -- it's sent to  
13 Terry Bollea. That's the third line, where it says  
14 "to." Right here.

15 A. Okay. Yes.

16 Q. Would that have been to you at your e-mail  
17 address?

18 A. I have no idea. This could have been handed  
19 to me in a hotel room.

20 Q. So you have no recollection one way or  
21 another of receiving this e-mail?

22 A. No. Usually with TNA, they are still  
23 scrambling at the end to get more media coverage for  
24 the Pay-per-view. And I usually wouldn't get a final,  
25 final until I checked in the hotel room. It was

1 usually slid under the door, usually.

2 Q. And this one is a -- you know, looks like  
3 it's the media tour. The subject says: New York City,  
4 i-t-i-n, which I assume is short for itinerary.

5 Does that seem right to you?

6 A. I don't see that, but yes.

7 Q. Sorry. Let me point to where I'm --

8 A. Okay, yes.

9 Q. Subject, right?

10 A. Yes.

11 Q. So the period of time is October 8th through  
12 10th, and this is sent October 3rd. So it's pretty  
13 soon -- just, you know, pretty close to the time,  
14 right?

15 A. Yes.

16 Q. All right. And if we could -- just below  
17 that, just below where it says to Terry Bollea, right  
18 here, there is some cc's. One is to Jay Wortman at  
19 Wortman Works?

20 A. Uh-huh (Indicates affirmatively).

21 Q. And then who is Bruce Prichard?

22 A. He was the talent coordinator there.

23 Q. "There" meaning at TNA?

24 A. Yes.

25 Q. And who is Chris Thomas?

1 A. I have no idea.

2 Q. And who is Bob Rider?

3 A. He's the travel agent.

4 Q. For TNA or --

5 A. Yes, for TNA.

6 Q. So it's not your personal travel agent?

7 A. No.

8 Q. If you could turn to the next page marked  
9 Bollea 001061, it says: Hulk Hogan, NYC Media Tour,  
10 Bound For Glory Go Home Tour.

11 What does the "Go Home Tour" mean?

12 A. I have no idea.

13 Q. Okay. Then it shows your accommodations at  
14 the Parker Meridien. I think you mentioned yesterday  
15 about having a phone conversation from the Parker  
16 Meridien. Does that seem right that you stayed  
17 there --

18 A. Yes.

19 Q. -- during this tour?

20 And then it says: Promote. It says, Jules;  
21 Terry and Jennifer to arrive at NYC on October 8th.

22 I assume Jules is Jules Wortman?

23 A. Uh-huh (Indicates affirmatively).

24 Q. You have to answer yes or no, sir.

25 A. Oh, yes. I'm sorry.

1 Q. Terry would be you?

2 A. Yes.

3 Q. And Jennifer would be your wife?

4 A. Yes.

5 Q. All right.

6 A. She didn't go.

7 Q. She didn't end up going?

8 A. No.

9 Q. For any portion of this tour?

10 A. No. She stayed home.

11 Q. Do you know why she stayed home?

12 A. No. She just -- usually, you know, she will  
13 pick and choose, you know, mainly because she didn't  
14 want to leave our dogs at home. She doesn't like to  
15 put the dogs in the kennel because Duke always loses  
16 weight. He's the alpha male that's just skittish.

17 So if it's something that's really exciting  
18 or something like a WrestleMania or the Bound For Glory  
19 or something like that, she may want to go. But just a  
20 media tour, usually she doesn't go. But I always, when  
21 I make a reservation, include her just in case she  
22 wants to go.

23 Q. Fair enough.

24 Under that, it says: Promote BFG tune-in.

25 What does that mean?

1 A. Bound For Glory.

2 Q. Okay. What does it mean, "tune-in"?

3 A. To tell people to watch, the time.

4 Q. Tell people to watch?

5 A. Or whatever.

6 Q. All right. The Spike tune-in?

7 A. Watch Spike.

8 Q. All right. And then this says: Spike  
9 tune-in Thursday.

10 Was the program for TNA on Spike on Thursday?

11 A. Yes, sir.

12 Q. And then: Countdown to BFG on Spike.

13 What is that, if you know?

14 A. Tune in Thursday and count down Bound For  
15 Glory. I assume the Thursday show was the countdown to  
16 that Sunday Pay-per-view.

17 Q. Okay. What does it mean to be a countdown?

18 A. It's -- it's just their way of saying this is  
19 the last show, hours away, days away from the big  
20 Pay-per-view.

21 Q. Got it.

22 Then this shows media tour Tuesday, October  
23 9th. The first listing is SiriusXM, Howard Stern.

24 Were you on Howard Stern for this media --

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

1 Q. Next one, just skipping down to maybe just  
2 towards the bottom of the page, it says: Today Show  
3 with KL and Hoda.

4 Were you on the Today Show as part of this  
5 media tour?

6 A. Yes, I was.

7 Q. Okay.

8 A. To the best of my recollection, I was.

9 Q. Turning to the next page, it says: Marvel,  
10 marvel.com. And then it says, Notes, on-camera  
11 interview to discuss BFG and pictures with staff.

12 Were you on something for Marvel Comics, do  
13 you know?

14 A. I don't know if I made that one or not. It's  
15 possible. Right after this one, the Today Show, is  
16 when I went back to the room and sometime during that  
17 time, that's when TMZ called me. And I don't know if  
18 we rescheduled that or if I made it, but I know I had a  
19 short time period there where I really was in bad  
20 shape.

21 Q. And to the best of your recollection, that  
22 would have been after the Today Show appearance?

23 A. Yes, it was after the Today Show.

24 Q. All right. And after that TMZ appearance,  
25 before the next media appearance that you actually went

1 to, did you have any communications with Bubba Clem?

2 A. No, I didn't. I did not.

3 Q. Okay. Turning to the next one, which is:  
4 Huffington Post Live with Mark Hill interview, Pro  
5 Wrestling is Alive and Well.

6 Did you do that appearance?

7 A. I don't recall if I did or not.

8 Q. All right. And then the bottom of the page  
9 it refers to Hannity Fox -- sorry. Hannity Fox TV,  
10 taped to air later, one on one.

11 Were you interviewed by Sean Hannity?

12 A. I don't recall that.

13 Q. Okay. And then turning to the next page, it  
14 refers to an appearance on Piers Morgan on CNN Live.

15 Were you interviewed by Piers Morgan?

16 A. Yes, I was.

17 Q. And just let me ask you this. There is a  
18 couple of references to this, but let me ask you about  
19 this one. Just below the contact information from  
20 Piers Morgan, it says: Discuss BFG tune-in, Spike, and  
21 Hulk personal.

22 What did you understand it to mean, "Hulk  
23 personal"?

24 A. I didn't know that personal notation was  
25 there. I didn't -- don't remember seeing it.

1 Q. Does it surprise you now that you look at  
2 that to see that?

3 A. No, because sometimes people talk about the  
4 divorce. Sometimes people will talk about my son's  
5 accident. But we try not to focus on it, because a lot  
6 of times people put this horrible picture up of my  
7 son's accident. And usually when Elizabeth Rosenthal  
8 is involved -- and I tried to bring Jules up to  
9 speed -- I would say no personal questions about the  
10 divorce or the fact that my wife was telling everybody  
11 I was a homosexual at that time, or my son's accident.

12 And sometimes they will say, We have to touch  
13 on it for -- to do the interview. There is some rules  
14 made that we may just ask about how your son is doing  
15 and move on. We may ask about, Do you talk to your  
16 ex-wife? and move on. So anything personal like that  
17 usually pertained to the problems I had with my wife  
18 and my son.

19 Q. Do you -- so the fact that this says "Hulk  
20 personal" may mean that there was some negotiation that  
21 they could ask you some personal questions on the  
22 CNN -- on the Piers Morgan?

23 MR. HARDER: Calls for speculation.

24 THE WITNESS: The personal, if it meant what  
25 I'm trying to remember, it would be a limited



1 question, so we could move on, because they would  
2 have to touch on it.

3 BY MR. BERLIN:

4 Q. Right.

5 A. And move on and not stay on it.

6 Q. And is this sort of some warning to you that  
7 they are -- this is -- hey, this is one of the ones  
8 where they may touch on something personal?

9 A. Yes.

10 Q. Okay. And speaking of that, can you -- is  
11 there anything else about any ground rules about  
12 talking about your personal life that either you or  
13 Elizabeth Rosenthal would have imposed on your behalf  
14 during this tour for TNA?

15 A. Yes.

16 Q. What would they have -- they have done?

17 A. Well, they would be to try to -- we're there  
18 to talk about the wrestling events. And we need the  
19 help, of course. And some people that would normally  
20 not talk about the Pay-per-view at all and just want to  
21 talk about the divorce, or the accusations of me being  
22 gay, or my son's wreck, or anything else that was  
23 personal, we would just make rules and parameters:  
24 Okay, we'll do the interview, but you can only ask one  
25 question about it, and you can't talk anymore about it.

1 That would be -- that would be to let me know.

2 Q. All right. And then it says after that:  
3 Some election questions.

4 Do you know what that means?

5 A. Yeah, I do.

6 Q. What does that mean?

7 A. Well, there was -- I made an announcement on  
8 Jay Leno years ago that I was going to run -- I was  
9 going to run -- to seek the office of the president of  
10 the United States. And they had a couple test markets  
11 where -- when Clinton was at the height of his  
12 population. Right after, they did whatever they did to  
13 find out he was at the height of his population. They  
14 did two test markets with 10,000 people and I got 33 --  
15 he got 33 and a third percent of the votes. I got 66  
16 and two thirds percent of the votes. And it had  
17 nothing to do with credibility. It had to do with  
18 popularity. So I knew they were going to ask me about  
19 that, and then what I thought about the current  
20 environment -- yeah, the current environment of the  
21 president and everything else.

22 Q. This was right before the presidential  
23 election?

24 A. Yeah, yeah. It was -- I don't know if it was  
25 or not, but for some reason, they wanted to talk to me

1 about me running -- putting my hat in the ring, because  
2 I had said something about a flat tax, and something --  
3 a bunch of other things.

4 Q. And then let me just ask you about that. You  
5 thought about running for office again?

6 MR. HARDER: Objection.

7 THE WITNESS: I thought about leaving the  
8 beach and having to live in the White House and  
9 that wouldn't work. And I didn't want to do too  
10 good a -- too good a job and get assassinated.  
11 Sorry, it's not an option. I haven't really  
12 pursued it after that. Plus, I couldn't take a  
13 cut in pay.

14 BY MR. BERLIN:

15 Q. Let me move onto the next one. It says  
16 that -- it refers to Imus radio, Fox business channel,  
17 live TV.

18 Did you do that program?

19 A. Oh, gosh. I have no idea if I did or not.  
20 Imus is an old friend, and usually we try to work him  
21 in, because we have -- for some reason, him and I just  
22 hit it off real well.

23 Q. You click well?

24 A. Yeah. There is chemistry with him. He's  
25 a -- he's a straight shooter.

1 Q. And then at the bottom, it says: Arrive at  
2 VH1. And then it says: Green room interview.

3 And then you have to turn the page for the  
4 next reference. It says: Viacom corporate blog.

5 Were you interviewed for the Viacom corporate  
6 blog, if you recall?

7 A. Oh, my gosh. No, I don't recall that.

8 Q. All right.

9 A. I don't know who that lady is. I'm sure if I  
10 saw her, I would recognize her. I'm not good with  
11 names, as you know.

12 Q. And then were you -- were you interviewed on  
13 the Big Morning Buzz Live with Carrie Keagan?

14 A. I remember going to the Sirius building, and  
15 as I was in that building, they drug me probably from  
16 five to ten different shows, because if I was there for  
17 one -- and I do remember going to the building. There  
18 is a hallway, a long skinny hallway with a bunch of  
19 doors, and they just kept pulling me in different  
20 rooms. Do country, do rhythm and blues, do this, do  
21 talk, do hip hop. I just remember them pulling me into  
22 a bunch of different rooms, all of a sudden, and doing  
23 interviews.

24 Q. Sorry. I just -- I want to get to the Sirius  
25 in just one moment --

1 A. I'm sorry.

2 Q. -- and I will ask you another question --  
3 questions about that.

4 A. Sorry.

5 Q. Just above where it says SiriusXM rounds, at  
6 the top of the page, it says VH1 -- let me point if I  
7 could, right here.

8 A. Yes.

9 Q. VH1 Big Morning Buzz Live with Carrie Keagan.

10 A. Yes.

11 Q. Did you -- that would have been at the Viacom  
12 building. Did you do that interview?

13 A. I don't recall if I did or not.

14 Q. Okay. Now, if we could move to the SiriusXM,  
15 and then we'll go -- if you will look at the schedule  
16 here.

17 A. Yeah. Okay.

18 Q. Yeah. Were you on a show called Shade 45  
19 with Sway? Does that sound familiar?

20 A. Sounds familiar, but like I said, I was --  
21 once I'm in that building, they pulled me into so many  
22 interviews, like it's listed here. And it's usually  
23 more than just this. I don't recall exactly what I did  
24 that day.

25 Q. Do you know if TNA keeps copies of all your

1 interviews that they are -- on which you're promoting  
2 their wrestling events?

3 A. I don't have a clue what they keep a copy of.  
4 I mean, I -- I have a hard time getting any  
5 documentation from them as it relate -- as it relates  
6 to anything from licensing or merchandise or any  
7 auditing stuff. They get a real -- they get a real  
8 problem with that. So they may keep records of it,  
9 but --

10 Q. You wouldn't know?

11 A. No.

12 Q. Just turning to the next one below Shade 45  
13 with Sway, it refers to a program called Busted Open.

14 Were you on the program called Busted Open?

15 A. I don't recall.

16 Q. And it says: We have a fly away to BFG with  
17 them.

18 Do you know what that means?

19 A. Fly away would probably be an audio clip,  
20 pre-produced, promoting the Bound For Glory, since it's  
21 radio.

22 Q. Fair enough.

23 And then were you on a show called Morning  
24 Mash-up?

25 A. I don't recall.

1 Q. All right. What about The Sam Roberts show?

2 A. I don't recall.

3 Q. What about Covino & Rich?

4 A. I don't recall.

5 Q. Okay. And then the next big one is: CNN  
6 Show Biz Today with A.J. Hammer.

7 Were you on that program?

8 A. Yes, I was.

9 Q. And then at the -- towards the bottom where  
10 it says interview, it says: Entertainment and style  
11 with a little gossip always thrown in.

12 Do you see where I'm pointing?

13 A. Yes.

14 Q. Down here?

15 A. (Nods affirmatively).

16 Q. And then it says: Had Brooke on this summer  
17 and she was asked about family.

18 Was she, in fact, on that show and asked  
19 about her family earlier that year?

20 A. I have no idea.

21 Q. And then it says: BFG impact tune-in. And  
22 then it says: I'm sure he will ask about your new  
23 ventures.

24 Do you know what that means, "new ventures"?

25 A. New ventures would probably be if I had any

1 other businesses going.

2 Q. Well, this is just before, I think you -- if  
3 I understand your testimony from yesterday, this is  
4 just before you opened Hogan's Beach and the Hogan's  
5 Beach Restaurant.

6 Is it possible that that's what he meant?

7 A. That's a possibility.

8 Q. You have no specific recollection one way or  
9 the other?

10 A. Of what?

11 Q. Of what he actually asked about at the -- on  
12 this program?

13 A. Oh, yeah, I do.

14 Q. What did he ask about?

15 A. He was really in my face about the sex tape  
16 on this interview. I remember that.

17 Q. This one with A.J. Hammer?

18 A. Yes.

19 Q. Did you tell him before you went on the show  
20 not to talk about that?

21 A. I don't recall.

22 Q. Did it upset you that he was in your face  
23 about the sex tape?

24 A. It was very uncomfortable. And I just  
25 remember that I was sweating and he was sweating a lot



1 more than I was, and he said he was very uncomfortable,  
2 too, after the interview.

3 Q. Did you finish the interview?

4 A. To the best of my recollection.

5 Q. You didn't -- you were uncomfortable, but you  
6 didn't get up and walk out?

7 A. No. He was -- he was -- to the best of my  
8 recollection, I remember telling him how good -- what a  
9 professional he was and how well he conducted himself,  
10 and he didn't, you know, cheap-shot me like a lot of  
11 other people would have.

12 Q. So when you say he was in your face but he  
13 was professional, is it fair to say he was asking you  
14 tough questions but he did it --

15 A. Yes, he was.

16 Q. But he did it professional?

17 A. Yes, sir.

18 Q. All right. And then the -- if you turn to  
19 the last -- the next page, marked Bollea 001065, it  
20 says, Wallstreetjournal.com video.

21 Did you appear on that, do you know?

22 A. I don't recall that.

23 Q. It refers to an interviewer called Lee  
24 Hawkins.

25 Does that name ring any bells to you?

1 A. No, it doesn't.

2 Q. All right. Now, having looked at this and  
3 having sort of talked about the kinds of places you  
4 were appearing for TNA Wrestling, is this kind of media  
5 tour typical for the other -- of the other ones that  
6 you had done for TNA Wrestling?

7 A. It's typical, yes.

8 Q. Okay. Had you done tours like that for other  
9 places, like WWE?

10 A. Yes.

11 Q. And was it typical of a -- like a tour for  
12 WWE?

13 A. No.

14 Q. How is that one different?

15 A. WWE has more mainstream media more  
16 consistently. They -- they target more of -- or they  
17 have the ability to -- their product, the product that  
18 they produce, is more openly accepted by larger shows.  
19 I mean, because of my track record, I can usually get  
20 on larger shows. But if I have TNA as a product,  
21 sometimes that stops me from getting on larger shows.

22 So when you ask me if the WWE media tour was  
23 typical, it's not, because with Hulk Hogan and the WWE  
24 brand, we can get on larger shows than what was on  
25 this.