

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

TERRY GENE BOLLEA professionally
known as HULK HOGAN,

Plaintiff,

Case No.: 12012447-CI-011

vs.

HEATHER CLEM; GAWKER MEDIA,
LLC aka GAWKER MEDIA; et al.,

Defendants.

NOTICE OF TAKING OF VIDEOTAPED DEPOSITION

PLEASE TAKE NOTICE, pursuant to Florida Rules of Civil Procedure 1.310(b)(6),
Defendant Gawker Media, LLC, by and through the undersigned attorney, will take the
deposition testimony of the following:

DEPONENT: Corporate Representative of TNA Entertainment, LLC with the most
knowledge regarding the matters listed on Schedule A (attached
hereto)

DATE: February 27

TIME: 10:00 a.m., until completion

PLACE: Offices of Waller Lansden Dortch & Davis, LLP
Union Street, Suite 2700
Nashville, TN 37203
(615) 224-6380

upon oral examination, before an officer duly authorized to administer oaths by the laws of the
State of Tennessee, and a person who is neither a relative, nor attorney, nor counsel of any of the
parties and who is neither a relative nor employee of such attorney or counsel, and who is not
financially interested in the examination. The oral examination will be videotaped by an

operator from Morgan Reporting, 352 Parsons Street, Murfreesboro, TN 37127, and Defendant Gawker Media, LLC shall bear the initial cost of the videotaping.

TNA Entertainment, LLC shall designate one or more officers, directors, managing agents or other persons to testify on its behalf on the topics listed on Schedule A.

This deposition is being taken for the purpose of discovery, and for use at trial, or both of the foregoing, or for such other purposes as are permitted under the applicable and governing rules.

Respectfully submitted,

THOMAS & LOCICERO PL

By: /s/ Gregg D. Thomas

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Counsel for Defendant Gawker Media, LLC

SCHEDULE A

INSTRUCTIONS AND DEFINITIONS

1. “You” and “your” mean TNA Entertainment, LLC (“TNA”) and any subsidiaries, employees, agents, attorneys, or other persons or entities acting for or on behalf of or in concert with TNA. When documents or things are requested, such request includes materials in the possession, custody or control of your agents, attorneys or other persons acting on your behalf.
2. “Document Subpoena” means the Subpoena Duces Tecum Without Deposition served upon you by Gawker Media, LLC in connection with this lawsuit.
3. “Terry Bollea” means Terry Gene Bollea (professionally known as “Hulk Hogan”).
4. “Hulk Hogan” means the character played by Terry Bollea.
5. “Jules Wortman” means the publicist by the name Jules Wortman or Jules Wortman Pomeroy.
6. “Wortman Works” means the public relations company operated by Jules Wortman.
7. “David Houston” means the person by that name who is Terry Bollea’s attorney.
8. “Charles Harder” means the person by that name who is Terry Bollea’s attorney.
9. “Bubba Clem” means Bubba the Love Sponge Clem.
10. “Heather Clem” means Defendant Heather Clem, former wife of Bubba Clem and the woman who appears in the video that accompanied the Gawker Story, as that term is defined below.
11. “Bubba the Love Sponge Show” means the radio show hosted by Bubba Clem.

12. “Elizabeth Rosenthal Traub” means the woman by that name who has worked as a publicist and/or public relations consultant for Terry Bollea, and who is currently affiliated with EJ Media Group.

13. “EJ Media Group” means the public-relations firm for which Elizabeth Rosenthal Traub works.

14. The “Gawker Story” means the story entitled “Even For a Minute, Watching Hulk Hogan Have Sex on a Canopy Bed is Not Safe For Work, But Watch It Anyway,” as well as the accompanying video, published on www.gawker.com on or about October 4, 2012.

15. The “Lawsuit” means any legal proceeding instituted against Gawker Media, LLC, Bubba Clem, or Heather Clem by Terry Bollea relating to the Gawker Story.

16. “Sexual Relations” means sexual intercourse, anal intercourse, fellatio, or cunnilingus.

17. “Sex Tape” means any video, audio and/or audio/video footage featuring Terry Bollea or Hulk Hogan engaged in Sexual Relations with Heather Clem, including excerpts of any such footage.

18. “Hulk Hogan Videos” means video recordings in which Terry Bollea or Hulk Hogan is featured, whether disseminated on tapes, DVD or other tangible medium, or via download to computer, tablet, or mobile device.

19. “TMZ” refers to the celebrity news company that owns and operates the website www.TMZ.com.

20. “The Dirty” refers to the website by that name located at the web address www.thedirty.com.

21. “Bound for Glory” means TNA’s yearly pay-per-view special by that name.

22. “Documents sufficient to show” means that you are to produce documents sufficient to establish the subject of the document request and does not necessarily mean all documents relating to such a request.

23. “Media” includes television, radio, newspapers, magazines, websites, mobile apps, and any other form of mass communication.

24. “Communication” includes any type of correspondence, electronic mail, instant messages, voicemail, and any oral conversation, interview, discussion, negotiation, agreement, understanding, meeting or telephone conversation, as well as every kind of written or graphic communication.

TOPICS FOR DEPOSITION

1. The record-keeping and document retention policies of TNA.
2. The documents provided in response to the Document Subpoena, including, where applicable, the date sent, date received, the identities of all employees of TNA who reviewed each document, the identities of all employees of TNA who maintained each document, and the identities of all employees of TNA who had access to copies of each document.
3. The authenticity of documents provided in response to the Document Subpoena.
4. The Sex Tapes.
5. The Gawker Story.
6. Your reaction to any report published or broadcast by TMZ referring or relating to any of the Sex Tapes.
7. Your reaction to any report published by The Dirty referring or relating to any of the Sex Tapes.
8. Facts relating to public appearances or Media appearances by Terry Bollea or Hulk Hogan in March, April or October 2012, including but not limited to, (a) internal communications about those appearances, (b) communications with Terry Bollea or Hulk Hogan (or any agents, representatives, or attorneys representing Terry Bollea or Hulk Hogan) concerning those appearances, and (c) communications to Media outlets proposing, or from Media outlets soliciting, appearances by Terry Bollea or Hulk Hogan or concerning such appearance(s) on those Media outlets.
9. Communications with Jules Wortman or Wortman Works concerning Terry Bollea or Hulk Hogan for the period from March 1, 2012 through November 30, 2012 to the

extent that the communications refer or relate to the Sex Tapes, the Gawker Story, the Lawsuit, Bubba Clem, Heather Clem, or the appearance or potential appearance of Terry Bollea or Hulk Hogan on or in any Media.

10. Communications with Terry Bollea or Hulk Hogan, as well as any agents, representatives, or attorneys representing Terry Bollea or Hulk Hogan, in March, April, and October 2012 referring or relating to one or more of the following: the Sex Tapes, the Gawker Story, the Lawsuit, Bubba Clem, Heather Clem, any report published or broadcast by TMZ referring or relating to any of the Sex Tapes, or anything published by The Dirty referring or relating to any of the Sex Tapes.

11. Communications with Terry Bollea or Hulk Hogan during October 2012 referring or relating to the appearance or potential appearance of Terry Bollea or Hulk Hogan on or in any Media.

12. Your interest in renewing Terry Bollea's contract with TNA in 2013. This topic does not include any facts about compensation paid to Terry Bollea in the past, or potentially to be paid to him under a renewed contact.

13. Any talking points or similar documents developed for, provided to, or provided by Terry Bollea or Hulk Hogan in connection with Media appearances during March, April or October 2012.

14. Terry Bollea's or Hulk Hogan's appearances on or involvement with the Bubba the Love Sponge Show.

15. Bubba Clem's involvement with TNA as a wrestler or an on-air personality.

16. Communications with David Houston concerning Terry Bollea or Hulk Hogan from January 1, 2012 to the present.

17. Communications with Charles Harder concerning Terry Bollea or Hulk Hogan from January 1, 2012 to the present.

18. Communications with Elizabeth Rosenthal Traub or any other employee or agent of EJ Media concerning Terry Bollea or Hulk Hogan from January 1, 2012 to the present.

19. Communications with Terry Bollea or Hulk Hogan or any agent, representative, or attorney representing Terry Bollea or Hulk Hogan from January 1, 2012 to the present referring or relating to the appearance of Terry Bollea or Hulk Hogan on or in any Media, including but not limited to TMZ, The Dirty, and any of the Media listed in the document titled "Hulk Hogan NYC Media Tour" attached to an email sent from Jules Wortman to Terry Bollea on October 3, 2012 (a copy of which is attached hereto).

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 22nd day of December 2014, I caused a true and correct copy of the foregoing to be served by email upon the following counsel of record:

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Attorneys for Defendant Heather Clem

Gregg D. Thomas
Attorney

HULK HOGAN NYC MEDIA TOUR

BOUND FOR GLORY – GO HOME TOUR
October 8-10

ACCOMMODATIONS:

Le Parker Meridian
119 W. 56th Street
New York NY 10019

Jules and Terry and Jennifer to arrive in NYC on October 8th

PROMOTE: BFG TUNE IN, SPIKE TUNE in Thursday and COUNTDOWN TO BFG on SPIKE- Sunday- 7pm prior to BFG on PPV

MEDIA TOUR:

Tuesday, October 9

Lobby call: 7:40 am

8:00am-8:45am Sirius/XM HOWARD STERN

CONTACT: Spencer Mindich
SIRIUS/XM Satellite Radio
1221 Avenue of the Americas/48th
New York, NY 10020
212-584-5192
spencer.mindich@siriusxm.com

Will Murray
Producer
The Howard Stern Show
212-584-5330
will@howardstern.com

9:40 – 10:30am TODAY SHOW with KL and HODA

CONTACT:
Matthew Greenfield/producer
35 W 48th St. entrance
516-395-9131
Matthew.greenfield@nbcuni.com

Interview with Kathie Lee and Hoda

2222222

11:00am - 11:45 MARVEL, marvel.com (NY comic con starts on 10/10)

CONTACT:
Ben Morse, Associate Editor/marvel.com
135 West 50th St. B/T 6th/7th
617-519-6094
bmorse@marvel.com

NOTES: on-camera interview to discuss BFG, etc, - pics with staff

LUNCH BREAK: 12:45PM

Gotham Bar and Grill

Address:

12 East 12th Street
New York, NY 10003
Cross Street: 5th Ave + University Place

1:30pm-

CONTACT:

Tim Ryan
The Big Lead – Sports site

**2:15pm- 3:15 HUFFINGTON POST Live/ Marc Hill interview
'PRO WRESTLING IS ALIVE and WELL" with Jeff
Hardy on SKYPE**

CONTACT:
Basel Hamdan/producer HuffPost Live
770 Broadway, 4th floor/ E. 9th St. (entrance) in Neilson Bldg.
914-575-9206
Basel.hamen@huffingtonpost.com

(an overview on the art form of pro wrestling, the oldest art form, the new stars and the longevity of its legends) Mark Hill is a professor and Columbia University and does many shows on various topics and is a HUGE wrestling fan. A few months back he did a piece on "is wrestling dead" in which I combatted with this piece.

BREAK:

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6:45pm- 7:30pm HANNITY/FOX TV (taped to air later) one-on-one

CONTACT:
Tara Nicaj
1211 6th Ave
917-821-8351
Tara.nicaj@foxnews.com

Interviewer: Sean Hannity

Discuss tune in, and sure a few questions regarding small business,
and election since in the season

8:30pm – 9:30 PIRS MORGAN/ CNN LIVE

CONTACT:
Haleigh Raff
58th St. b/w 8/9th
917-678-0401
Haleigh.raff@turner.com

Discuss BFG tune in, Spike and Hulk (personal), some election
Questions.

Wednesday, October 10

Lobby Call: 8:10am Camera ready please

8:30am - 8:50 – IMUS / radio/FOX BUSINESS CH. LIVE TV

Contact:
Carley: studio contact for day
908-672-3469
1211 Ave. of Americas (security desk check in)

Meghan@imusranch.com - booker

Interview: Imus and his sidekick Bernard (tune in for BFG, IW)

9:10am – 11:00 ARRIVE at VHI

Green Room interview:
VIACOM CORP BLOC (interviewer TBD, per VIACOM)

444444

10:00am- VHI "Big Morning Buzz Live" with Carrie Keagan

Contact:

Meena Charaipotra

Olga Tchoumak – segment producer

VHI 20th floor Lobby MTVN studio

1515 Broadway (Times Square)

ENTER/ DROP OFF: 45th St/7th

Cell: 723-570-7773

(they prefer no LOGOS, but IMPACT should be fine – family brand)

11:20am-1:30 SIRIUS/XM rounds

CONTACT:

Spencer Mindich – Talent Relations

1221 Avenue of the Americas/48th

New York, NY 10020

212-584-5192

spencer.mindich@siriusxm.com

SCHEDULE:

11:35:	Shade 45 with Sway
NOON	Busted Open (we have a fly away to BFG with them)
12:30	Morning Mash Up
12:45	Sam Roberts Show
1:05	Covino and Rich
1:30	WRAP

2:30pm- 3:15 CNN Showbiz Today with AJ Hammer

CONTACT:

Marc Balinsky – Sr. Producer

Time Warner Center

58th St. b/w 8/9th

212-275-8074

Marc.balinsky@turner.com

Interview: Entertainment style with a little gossip always thrown in, Had Brooke on this summer and she was asked about family. BFG, Impact Tune in and I am sure he will ask about your new ventures.

3:30pm- 4:00 Wall Street Journal.com Video

Contact:

Lee Hawkins – interviewer

27th/6th St

212 416 2844

Lee.hawkins@wsj.com

Interview: Lee will discuss the "Business of Pro Wrestling" - below are some recent clips from wsj.com

Kardashians:

<http://www.youtube.com/watch?v=vBkzFCpeAbI&feature=plcp>

Business of the UFC: <http://www.youtube.com/watch?v=Jj2ExOJ-WM4>

THANKS FOR A WONDERFUL TOUR: AIRPORT BOUND

CONTACT NUMBERS:

Jules Wortman
615-260-9985

Ronnie Lang
516-322-9242