EXHIBIT D

   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.
- - - - - - - - - - - - - - - - - - -/

     HEARING BEFORE THE HONORABLE PAMELA CAMPBELL

  DATE: October 29, 2013

  TIME: 10:22 a.m. to 12:31 p.m.

  PLACE: Pinellas County Courthouse
                     545 First Avenue North
                     St. Petersburg, Florida

  REPORTED BY: Susan C. Riesdorph, RPR, CRR
                     Notary Public, State of
                     Florida

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Riesdorph Reporting Group, Inc. (813) 222-8963

that tape to their website. And it was up on

their website for about six months. They have

sought to take discovery into every possible

aspect of Terry Bollea's life, sought every single

piece of paper that he could possibly possess on

earth. And so we brought this motion for

protective order to confine the discovery to what

this case is about rather than everything about

Terry Bollea as it exists, in particular his sex

life.

The encounter obviously is at issue in the

case. And so discovery pertaining to that

encounter is relevant to the case. We are giving

them everything that we have that's not

privileged. But they've asked for everything

about every person he's had sex with in the course

of several years, the details of all of those

sexual encounters, everything you can imagine

pertaining to his sex life, in addition to the one

encounter that's at issue. So we've brought a

motion for protective order to limit the

discovery, including documents, including

interrogatories, including questions that will be

asked of him at deposition, to the one encounter

that's at issue in this case. I could go into

Court and to me, last page of it is page 669. So we've produced at least 669 pages of documents. And I think that we produced another hundred pages or so on top of that. So we're talking close to 800 pages of documents that we've produced. When he first came up, he said that there were 17 documents that we produced. It was something like 800 pages.

Somebody who is taped against their will and against their knowledge, they're not going to have a lot of documents. I'm surprised that we had as much as we did. Hulk Hogan doesn't do e-mail. And so it's not that there was much in the way of e-mail.

In terms of communications that he's had, he went on a -- he did do some press things, but we don't have any documents about his interview that he did. But you can get all that from a Google search if you -- and so when we say it's -- what's the term for it -- mutually available or equally available, we don't keep press stories. Hulk Hogan doesn't. He has a publicist who is a very, very limited publicist. He does not keep press stories. No one keeps press stories on our side. If they want press stories, they can do a

1   search. Lexis-Nexis has a database. Google has a

2   database. They're a news organization. I assume

3   they know how to get news stories. And we're not

4   hiding anything. It's -- those types of things

5   are available.

6   I think a key point here is that when they're

7   asking for discovery, that discovery either has to

8   be relevant to what the case is about or it has to

9   lead to -- be reasonably calculated to lead to

10   admissible evidence. I just don't see how the

11   great majority of things that they've moved to

12   compel on are going to lead to admissible

13   evidence. They want everything about his sex

14   life. They want everything about his finances.

15   They want everything about a great number of

16   things, everything about his divorce. Well, it

17   has to lead to admissible evidence. I don't see

18   how any of these things are admissible.

19   In terms of privilege, we haven't done a

20   privilege log because I don't have any

21   privilege -- there are no privileged

22   communications that I'm aware of -- and I've asked

23   for them and I've done everything I can to find

24   them -- other than communications that happened

25   after litigation counsel was retained to fight

                    REPORTER'S CERTIFICATE

STATE OF FLORIDA   :

COUNTY OF HILLSBOROUGH   :

          I, Susan C. Riesdorph, RPR, CRR certify that I
was authorized to and did stenographically report the
foregoing proceedings 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 31st day of October, 2013, IN THE
CITY OF TAMPA, COUNTY OF HILLSBOROUGH, STATE OF
FLORIDA.

              Susan C. Riesdorph, RPR, CRR, CLSP