

EXHIBIT 7

to the

**AFFIDAVIT OF RACHEL E. FUGATE IN SUPPORT OF THE PUBLISHER
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

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,

vs.

Case No.
 12-012447-CI-011

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

Defendants.

VIDEOTAPED

DEPOSITION OF: HEATHER COLE,
 formerly known as
 HEATHER CLEM

DATE: January 26, 2015

TIME: 10:07 a.m. to 1:59 p.m.

PLACE: Bajo, Cuva, Cohen & Turkel, P.A.
 100 North Tampa Street
 Suite 1900
 Tampa, Florida

PURSUANT TO: Notice by counsel for Defendant
 Gawker Media, LLC, 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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APPEARANCES CONTINUED AS FOLLOWS:

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Attorney for Defendant Heather Clem

ALSO PRESENT:

Mike Byrd, videographer
Terry Gene Bollea
Judge James R. Case

1 the last 24 hours that you feel would affect your
2 ability to recall events or answer truthfully?

3 A. No.

4 Q. When did you first meet Bubba Clem?

5 A. 2002, I think.

6 Q. And when did you marry Bubba Clem?

7 A. January 2007.

8 Q. And you eventually got divorced?

9 A. Correct.

10 Q. And when was that?

11 A. Three and a half years ago.

12 Q. Do you recall the year?

13 A. I think 2012.

14 Q. Do you recall when you first met Terry
15 Bollea?

16 A. Yes.

17 Q. And when was that?

18 A. At a 4th of July celebration.

19 Q. Do you recall the year or approximately?

20 A. Within two years of meeting Bubba.

21 Q. So maybe 2004, you think?

22 A. Possibly.

23 Q. How would you describe your relationship with
24 Terry Bollea during the first, say, two years that you
25 knew him?

1 A. Yes.

2 Q. Did you-all live together before you were
3 married?

4 A. Yes.

5 Q. For how long?

6 A. About a year.

7 Q. And just -- if I remember what you had said
8 earlier, you got married in 2007?

9 A. I think, yes.

10 Q. And so you moved in together -- you-all
11 started living together sometime in 2006 time?

12 A. Approximately.

13 Q. Where did you live when you-all lived
14 together?

15 A. In his house.

16 Q. So this was a house that he was already
17 living in, and you moved in?

18 A. Correct.

19 Q. Did your daughter move in with you at the
20 same time, like --

21 A. Yes.

22 Q. Describe your actual wedding to Mr. Clem, the
23 actual wedding day. It was a big wedding, a small
24 wedding?

25 A. It was a big wedding. It was in the church

1 that we attended. There was a large reception
2 afterwards.

3 Q. Was your wedding covered by the press?

4 A. I know after the wedding it was in the
5 newspaper. Prior to the wedding, we were interviewed
6 by a reporter on the impending wedding. There was not
7 media there to film it, that I'm aware of.

8 Q. Why do you think it was covered by the press?

9 A. Because --

10 MR. HARDER: Calls for speculation.

11 THE WITNESS: -- I think Bubba wanted it to
12 be.

13 BY MR. BERRY:

14 Q. Did he ask the newspaper and this reporter to
15 cover it, do you know?

16 A. I don't know, but he asked.

17 Q. But why do you think he wanted it to be
18 publicized?

19 A. Because he granted the interview.

20 Q. And were there media personalities who were
21 at the wedding?

22 A. What is your definition of a "media
23 personality"?

24 Q. Well, was Howard Stern there?

25 A. Yes.

1 Q. Were other celebrities there?

2 A. Yes.

3 Q. Do you recall some of the folks who were
4 there who were celebrities?

5 A. Howard's staff was there; Mr. Hogan was
6 there.

7 Q. During the time while you-all were -- after
8 you had moved in with Mr. Clem through the time that
9 you were married, it sounds like Mr. Clem was on the
10 radio at that time, throughout that time?

11 A. Yes.

12 Q. Describe the nature of his radio show.

13 A. In my opinion, it is a show about his
14 personal life, low-brow humor, some current events.

15 Q. During the time that you-all were married, he
16 was on Sirius?

17 A. I think so.

18 Q. And during that time period, what was his
19 show's reputation? What was it known for?

20 A. I think most would consider him a shock jock.

21 Q. Was the show popular during that period?

22 A. I think that's a subjective assumption.

23 Popular in what manner?

24 Q. Was it your impression that a lot of people
25 listened to it?

1 A. I know that the people that we were friends
2 with and close to listened to it.

3 Q. And why did they listen to it?

4 A. I don't know.

5 Q. Okay. From what I understand, Mr. Clem's
6 radio show can be controversial at times, right?

7 A. I think that's a fair assumption.

8 Q. Does he court controversy?

9 A. In my opinion, yes.

10 Q. Why is that your opinion? I guess, what
11 gives you reason to think that he courts controversy?

12 A. In the time we were involved in a
13 relationship, there was much controversy with his radio
14 show and his personal life.

15

REDACTED

1 **REDACTED**

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5 Q. Did Mr. Clem have any views about publicity

6 for himself?

7 A. Yes.

8 Q. What were those?

9 A. I remember him saying that there is no such

10 thing as bad publicity, as long as they spell your name

11 right.

12 Q. And during the time that you-all were dating

13 and married, was that kind of a creed that he operated

14 by?

15 A. In my opinion, yes.

16 **REDACTED**

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REPORTER'S CERTIFICATE

STATE OF FLORIDA
COUNTY OF HILLSBOROUGH

I, Aaron T. Perkins, Registered Professional Reporter, certify that I was authorized to and did stenographically report the deposition of HEATHER COLE, formerly known as HEATHER CLEM; that a review of the transcript was requested; 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 action.

Dated this 30th day of January, 2015.



Aaron T. Perkins, RPR