

**CONFIDENTIAL
EXHIBIT 115-C**

to the

**SUPPLEMENTAL CONFIDENTIAL 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

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.)	

The Videotaped Deposition of:
JULES WORTMAN
April 7, 2015

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The videotaped deposition of Jules Wortman was taken pursuant to agreement at the law offices of Bradley Arant Boult & Cummings, LLP, Roundabout Plaza, 160 Division Street, Suite 700, Nashville, Tennessee, beginning at 10:16 A.M., at the instance of counsel for the Defendant, pursuant to the provisions of the Florida Rules of Civil Procedure.

All formalities as to notice, caption, except reading and signing of the deposition by the witness are waived. All objections except as to form of the question are reserved for the hearing.

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1 Q. So as I understand it, TNA puts on wrestling
2 shows throughout the country?

3 A. Yes.

4 Q. And it also produces a television show?

5 A. Yes, it does.

6 Q. When you were working there, television show
7 was broadcast nationally, right?

8 A. Yes. Internationally, actually.

9 Q. What was it broadcast on?

10 A. Spike TV when I was there.

11 Q. When did you start working for TNA?

12 A. Well, I've known Dixie for a long time and I
13 went to work for her September of whatever year, oh, I was
14 really going to be, initially I was going to just work as a
15 consultant, and then, I ended up becoming a vice-president
16 there in PR. I think it was September 2011.

17 Q. And how long did you work there?

18 A. Not long, 18 months.

19 Q. Okay.

20 A. I left March of 2013, I think it was.

21 Q. You had mentioned Dixie.

22 A. Excuse me.

23 Q. You had mentioned Dixie. Who is that?

24 A. This lady that, her family owns the company,
25 Dixie Carter.

1 Q. Yes.

2 A. Yes.

3 Q. Which outlets stand out in your mind?

4 A. Howard Stern, TMZ.

5 Q. Why do you say that he had good relationships
6 with those folks?

7 A. Because he did.

8 Q. In working with him, was there a particular
9 type of media that seemed interested in Hulk Hogan?

10 MR. VOGT: Objection to form.

11 A. A lot of media were interested in him,
12 national, news. He's an iconic figure. I mean, he makes
13 great television.

14 Q. (By Mr. Berry) In what way?

15 A. He's a great personality and he's very
16 engaging, so people like to have him on their shows.

17 Q. In working with him, did you have an
18 understanding about how, whether he had any particular views
19 on publicity?

20 A. I cannot answer that. I don't have a, I don't
21 know.

22 Q. So a couple of seconds ago, I had mentioned a
23 media tour in the fall of 2012 in New York. Do you recall
24 that?

25 A. Yes, sir.

1 Q. Why was that tour planned?

2 A. For "Bound For Glory," we call it Go Home,
3 they called it the Go Home Tour, and it's the media leading
4 up to the big event. And we do it every year. We did one in
5 2011 and we worked with Hulk and Kurt Angle and Jeff Hardy
6 and we did it again in 2012. Those were the two years I was
7 there and that was the main time we did a major national
8 tour.

9 Q. And who was Kurt Hardy and Jeff Angle?

10 A. Different names.

11 Q. Oh.

12 A. Kurt Angle and Jeff Hardy.

13 Q. Sorry.

14 A. They are two other wrestlers that were pretty
15 big, that we would use other talent, as well.

16 Q. In 2012, was it just Hulk or were those
17 fellows involved, as well?

18 A. Not on the national tour. They did some other
19 things local press and whatever, but Hulk did the national
20 tour.

21 Q. What was your --

22 A. I call it a national tour 'cause it was in
23 New York and that's the media center.

24 Q. And the media that he was on was all national
25 media?

1 A. Yes.

2 Q. And what was your role with that media tour on
3 October 2012?

4 A. Well, I set up the whole media tour which I
5 started back in probably August of that year, started setting
6 it up for the first of October.

7 Q. When you say setting it up, like specifically
8 what kind of things did you do?

9 A. Usually, you cannot book TV day of or week of,
10 you have to set it up. You have to go pitch it, create
11 interest, and try to lock down the dates that you have
12 available. I had a two-day window to do press, so I had to
13 negotiate and work with the TV bookers or the print or
14 whomever helping Huffington Post. Whatever we were doing,
15 you have to set it up well in advance, so that's what I mean
16 by set up.

17 Q. Do you recall when Hulk Hogan's involvement in
18 the tour was confirmed?

19 A. Probably, I couldn't tell you the exact day,
20 but probably around the end of August because I didn't start
21 setting things up until I had a confirmation that I had those
22 dates for him to do it and that was probably a month
23 and-a-half out from the tour.

24 Q. Okay. As I mentioned, during the deposition,
25 I'm going to show you a couple of documents.

1 A. Uh-huh. [Affirmative.]

2 Q. I'd like to go ahead and show you one now.

3 And we'll mark this as Exhibit 211.

4 (E-mail from Bob Ryder to Jules Wortman of
5 September 7, 2012, Bates label TNA-G0011 was
6 marked as Ex. No. 211 and attached to the
7 original of this deposition.)

8 Q. Just for background here, I'll give this to
9 you.

10 (Document handed to witness.)

11 A. I might have to grab my glasses.

12 Q. Yeah. Feel free.

13 A. Can you grab my bag 'cause I'll --

14 Q. Here you are.

15 (Purse handed to witness.)

16 A. If I can see it. I hope I have my glasses in
17 here.

18 Q. So just for background purposes, I'll be
19 showing you some documents. Some of these documents were
20 documents that were produced by TNA.

21 A. Uh-huh. [Affirmative.] So I was pretty
22 close, probably the end of August and that was Labor Day
23 weekend, so that was probably what that means right there.
24 Bob was our obviously director of talent and book, he did all
25 of our travel.

 Q. So, that's Bob Ryder?

1 A. Bob Ryder. So that e-mail to me September 7th
2 was a Friday, so he probably just talked to him about booking
3 the tour. I had already confirmed it probably at the end of
4 August. You know what I'm saying? So I was close.

5 Q. Right.

6 A. I don't know exact dates, but . . .

7 Q. These refreshes your recollection then about
8 roughly the time?

9 A. Uh-huh. [Affirmative.]

10 Q. Do you recall receiving this e-mail?

11 A. No.

12 Q. Okay. But --

13 MR. VOGT: Really?

14 A. Come on.

15 Q. (By Mr. Berry) But in it, Bob is confirming
16 to you that he's talked --

17 A. Book his travel. Uh-huh. [Affirmative.]
18 That's what that means, he was going to book his travel.

19 Q. And these are the specific dates that
20 Hulk Hogan is available for the media tour, right?

21 A. Correct.

22 Q. And the --

23 A. 'Cause we were doing two days. Uh-huh.
24 [Affirmative.]

25 Q. And the days that he said that Hulk would be

1 available were October 9th and 10th?

2 A. Correct.

3 Q. So by this point, your understanding was that
4 Hulk was locked in to coming to New York those days?

5 A. Uh-huh. [Affirmative.]

6 Q. And he was aware of the tour, right?

7 A. Correct.

8 Q. And then, based on what you had said earlier,
9 after Hulk's involvement was confirmed, you then would go
10 ahead and be able to set up the --

11 A. Correct.

12 Q. -- specific media appearances?

13 A. Correct.

14 Q. How did you go about selecting, pitching,
15 deciding what media to pitch Hulk to?

16 A. Well, some I have really good relationships so
17 I know I can get it booked; some of the other is trying to
18 make sure that all the markets were covered to try to get
19 tune in for our TV show, pay-per-view whenever that was. So
20 you try, you try to diversify the reach to hopefully get
21 people to tune into the show. That's how I do it --

22 Q. And so --

23 A. -- or would do it.

24 Q. And in this case in particular, when you were
25 going up to New York, you were kind of applying that analysis

1 Q. What is that attachment?

2 A. This right here where it says Hulk Hogan New
3 York Media Tour?

4 Q. Exactly.

5 A. That's what it is. It's the media tour.

6 Q. Basically --

7 A. Outlining our two days in New York.

8 Q. The places where he's scheduled to be?

9 A. Where he's scheduled to appear as of whatever
10 that day, Wednesday, whatever the day was, Wednesday of
11 October, the week before we left, I sent it to him.

12 Q. Okay. And this shows that he arrives in
13 October 8th in New York and then has two days of --

14 A. 9th and 10th of media. Uh-huh.

15 [Affirmative.]

16 Q. And I guess as you were saying, this list
17 shows the various media that he's going to be interviewed by,
18 right?

19 A. Yes, sir.

20 Q. And so, he was scheduled to be interviewed
21 first by Howard Stern?

22 A. Yes, sir.

23 Q. And then the Today Show?

24 A. Yes, sir.

25 Q. How did you decide to book him on those two

1 programs?

2 A. Well, Howard Stern is in Bubba the Love Sponge
3 was part of his show, not at this point, but Howard, we did,
4 Howard Stern and the Hulk. He was on that show a lot prior
5 to me whatever, but it's a big wrestling audience that
6 listens to him and there is a guy on the show that likes
7 wrestling, he has now since passed, I hear, Eric. And then
8 the today, and so the timing you know, you always, you know,
9 from a timing standpoint in the morning, his show is live at
10 that time, then you just try to plan your schedule to fit
11 whatever shows you're doing. So that's why we did him first.
12 And then we went over to the Today Show and did Kathie Lee
13 and Hoda pretty much right after that.

14 Q. And why did you book him on the Today Show?

15 A. Because it's a good show to be on. That's why
16 I booked him on there.

17 Q. It has a large national audience?

18 A. Correct.

19 Q. Then on the next page, it says Marvel?

20 A. Marvel comics, they are big supporters of
21 wrestling and their audience, again that's not something that
22 you'd normally do in other media, but in wrestling, things
23 like that, and they have a huge website and they do
24 interviews on it and so they did Hulk.

25 Q. And then it mentions next to that, New York

1 comic con starts on 10/10, what does that mean?

2 A. There is an event called comic con, that's all
3 over, they have one, the big one is in San Diego I think
4 every year. But they are, the New York one was starting that
5 week, so I was just letting him know that. That was just
6 like a little note to let him know in case they asked him
7 anything about comic con 'cause they do a lot, cover a lot of
8 the characters.

9 Q. And then after that, there is I guess an
10 interview with something called the Big Lead?

11 A. Big Lead which was, is a sports website that
12 is run by ESPN, bleacher reports ESPN, whatever, it's one of
13 those big, it's affiliated with one of those big sites. I
14 can't remember right now to be honest with you.

15 Q. Right. But that, was that, that was like --

16 A. We had lunch.

17 Q. -- a lunch-screen interview?

18 A. No. It was a handwritten. It was a print
19 on-line interview and he did the interview during lunch.

20 Q. And then, Huffington Post Live, what was that?

21 A. Uh-huh. [Affirmative.] Huffington Post Live,
22 Marc Hill is a Columbia professor and he's a talking head on
23 CNN, Fox, whatever. I happened to see back in the summer
24 where he was a huge wrestling fan and he was talking about if
25 wrestling was dead. And so I went to them and said I want to

1 do kind of like an op-ed with Hulk Hogan when we're in
2 New York with Marc regarding wrestling is alive and well.
3 That's why I had Jeff Hardy, the younger, hipper guy in on
4 that through Skype. So it was a live interview with Marc,
5 Marc Hill.

6 Q. And then, since Jeff Hardy wasn't there, he
7 did it --

8 A. He did it on Skype so I could get the younger
9 audience with the, I mean, the younger wrestler with the
10 older wrestler.

11 Q. And then, on the next page, there's
12 Hannity/Fox TV, that's Sean Hannity show?

13 A. Yes. It was canceled.

14 Q. When was that canceled?

15 A. About 4 o'clock that afternoon.

16 Q. Who canceled it?

17 A. Hannity.

18 Q. Do you know why it was canceled?

19 A. Yes.

20 Q. Why was that?

21 A. Because they were huge Hulk Hogan fans and he
22 did not want to discuss the situation that came up, so he
23 chose to cancel so he wouldn't have to ask him about it.

24 Q. And then after that, it says Piers Morgan/CNN
25 Live?

1 A. Uh-huh. [Affirmative.]

2 Q. That's the Piers Morgan show that was on in
3 the evening on CNN?

4 A. Yes, sir.

5 Q. And again, that was booked because, for what
6 reason?

7 A. To promote the Hulk Hogan, I mean, Hulk Hogan
8 promoting "Bound For Glory." I mean, all of these were to
9 promote.

10 Q. Piers Morgan at the time had a large national
11 audience, as well?

12 A. Yes, he did. The show is now off the air this
13 year.

14 Q. And then, the following day, Wednesday, it
15 says Imus/radio/Fox Business channel Live TV, what is that?

16 A. Donnie, Don Imus has a radio show that is also
17 booked and recorded live and it airs on Fox Business channel
18 now.

19 Q. On TV?

20 A. On TV. So that's why it was a radio show/live
21 TV show.

22 Q. And then, on the following page, VH1 "Big
23 Morning Buzz Live" with Carrie Keagan?

24 A. Uh-huh. [Affirmative.]

25 Q. What is that?

1 A. I don't think it's on the air anymore either.
2 All these shows are changing, but this was two years ago.
3 It's like a morning talk show that they had, the Big Morning
4 Buzz, they talked about what was hot, what was going on that
5 day in the world, pop culture, da, da, da, da, da. And they
6 liked Hulk Hogan. And the guy Andrew, he is not there
7 anymore, but he was a big wrestling fan for one of the
8 producers.

9 Q. And this was shown on VH1 --

10 A. Correct.

11 Q. -- the music channel?

12 A. Yes.

13 Q. And then, after that talks --

14 A. And they had a show, you know, that was on
15 VH1, Hulk Hogan's family reach, I don't know what it was
16 called, Hulk's best or something.

17 Q. The reality program?

18 A. Reality program. So, he had a relationship
19 with VH1.

20 Q. And then next, it says Sirius/XM rounds, what
21 does that mean?

22 A. XM rounds means you're not just doing one,
23 it's almost like a car wash at ESPN. It is like, if you
24 notice, it says schedule under Sirius XM, 11:35, we did one
25 show, Shade 45; at noon, we did Busted Open, which is the

1 wrestling show; then we did Morning Mash Up, Sam Roberts Show
2 was the sports show. So, we did like four different channels
3 within the XM, so that's what that means, the rounds. We
4 didn't just do one interview.

5 Q. Okay.

6 A. So that's what that means.

7 Q. And again, all of these shows are on?

8 A. Sirius XM, different channels. I couldn't
9 tell you what the numbers are.

10 Q. And when it says WRAP --

11 A. That means we're finished.

12 Q. -- that means done for the day?

13 A. Uh-huh. [Affirmative.]

14 Q. And the next one there is CNN Showbiz Today?

15 A. Uh-huh. [Affirmative.]

16 Q. Is that a yes is show on CNN?

17 A. Uh-huh. [Affirmative.]

18 Q. Was kind of show?

19 A. Showbiz Today, it is no longer on the air
20 either. They canceled a lot of these shows this year, I
21 think. It was basically like Entertainment Tonight, Access
22 Hollywood. It was just Showbiz Today on CNN.

23 Q. And why did you book Hulk on that show?

24 A. Because again, the audience is who we want to
25 reach and it was a good show to do at the time for anybody.

1 Q. And then, following that, it has
2 WallStreetJournal.com Video, what is that?

3 A. Wall Street Journal is a major, one of the top
4 read newspapers in the world. And the WallStreetJournal.com,
5 which everyone uses their dot coms now, this guy does
6 in-depth interviews, Lee, and he videotapes them and they
7 run on which there is the Kardashians and the UFC business.
8 I had links for him to see other ones so he could see them
9 if he wanted to look at them, kind of let the character of
10 the show. And so he wanted to discuss the business of
11 pro wrestling. That was canceled.

12 Q. When was that canceled?

13 A. Hulk canceled it.

14 Q. When was that?

15 A. He canceled it about 3 o'clock that day.

16 Q. Do you know why he canceled it?

17 A. He just told me he didn't want to do it.

18 Q. Did he actually make the call to cancel it?

19 A. No. I had to.

20 Q. But you don't know why he wanted it canceled?

21 A. (Witness shakes head in the negative.) No,
22 sir.

23 Q. In here, you pointed out that there is a link
24 to the Kardashians. Why did you use that link?

25 A. The interviewer sent me these links and so I

1 just attached them, the Business of UFC and the Kardashians.
2 He was showing different types of interviews he had done.
3 That's simply that.

4 Q. When -- Going back to something you had
5 mentioned earlier, I take it from what you had said before
6 that having Hulk Hogan as a figure head on this media tour
7 allowed TNA to get its name out through media it might not
8 otherwise have been able to do; is that right?

9 MR. VOGT: Objection to form.

10 A. Can you repeat that?

11 Q. (By Mr. Berry) Sorry. I probably didn't ask
12 that the best way. By having Hulk Hogan do this media tour,
13 would he get TNA's name through this national media outlet
14 that it might not otherwise have been able to get on?

15 A. Yes.

16 MR. VOGT: Objection.

17 Q. (By Mr. Berry) When you pitched him for these
18 interviews, did you pitch him as Hulk Hogan?

19 A. Yes.

20 Q. You didn't pitch him as Terry Bollea?

21 A. No, sir.

22 Q. Why not?

23 A. Because I was, 'cause everybody talks, no one
24 talks about him as Terry Bollea. They pitch him as
25 Hulk Hogan, the character, and he pretty much is that

1 Q. Was he trying to deflect the discussion of the
2 sex tape at that point?

3 MR. VOGT: Objection to form.

4 A. I can't answer that.

5 Q. (By Mr. Berry) Do you recall your reaction to
6 the Howard Stern interview at the time?

7 A. My reaction?

8 Q. (Nods head in the affirmative.)

9 A. My reaction is it is what it is.

10 Q. How did you think it worked from your
11 perspective? Did you think that the appearance went well?

12 A. I can't say that. I don't think any
13 appearance on Howard Stern goes well for anybody, so that's
14 just my opinion. So I can't answer that honestly.

15 Q. Why do you say that the appearance didn't go
16 well on Howard Stern for anybody?

17 A. He's a shock job, that's what he does. He
18 tries to deflect and catch people off guard. You got to be
19 on your toes.

20 Q. Do you recall during the media tour that Hulk
21 did an interview with TMZ?

22 A. I know it happened, but I didn't know it was
23 happening until people were calling me, telling me he was on
24 the show. I did not set that up.

25 Q. Do you know who did?

1 A. I have no idea.

2 Q. So you learned about it after the fact?

3 A. I learned about it while it was happening
4 'cause people started calling me.

5 Q. Who did you learn from?

6 A. I don't remember. I think Chris, actually, my
7 office might have been one of them called me.

8 Q. Do you recall which day during the media tour
9 that interview took place?

10 A. I know we had a break, I'd have to look. I
11 think it might have been the second day. Let me -- We were
12 doing --

13 Q. I mean, I can tell you. It was on
14 October 9.

15 A. Oh, okay. I know that we had TV. We had a
16 break, whatever, yeah, it was the 9th. Yeah. We had that
17 break and then I was out doing something and then Hannity
18 cancelled and so, then Piers Morgan, so it was some time that
19 afternoon, I think. I just didn't remember what day.

20 Q. What do you -- You never saw the interview
21 itself?

22 A. No.

23 Q. What do you recall hearing about the
24 interview?

25 A. The only thing I heard was that Hulk called in

1 and was talking live on the air to Harvey and one of the
2 other guys. And I think that's all I remember. I don't
3 remember. Someone said Hulk just called in to TMZ live, I
4 remember that. And then, I was like well, I didn't set that
5 up and I don't know why he would be doing that.

6 Q. Was that interview consistent with your
7 objectives for the media tour?

8 A. Well, it wasn't on my media tour.

9 Q. Do you know what they were talking about on
10 the TMZ interview?

11 A. I have no idea, but I would assume that it was
12 about why we're here.

13 Q. The sex tape?

14 A. I would assume.

15 Q. Did you ever talk to Hulk about that interview
16 after it occurred?

17 A. No, sir, not that I remember.

18 Q. Did that interview on TMV have any effect on
19 the media tour?

20 A. No, sir.

21 Q. Did it affect the nature of any interviews
22 that occurred afterwards?

23 A. I don't recall. We didn't do many more after
24 that.

25 Q. Well, you had like the whole second,

REPORTER'S CERTIFICATE

1 STATE OF TENNESSEE)
2) ss.
3 COUNTY OF DAVIDSON)

4 I, ANNE S. WILSON, Licensed Court Reporter and
5 Notary Public in and for the state of Tennessee, do hereby
6 certify that I reported the foregoing proceedings at the time
7 and place set forth in the caption thereof; that the witness
8 therein was duly sworn on oath to testify the truth; that the
9 proceedings were stenographically reported by me in
10 shorthand; and that the foregoing proceedings constitute a
11 true and correct transcript of said proceedings to the best
12 of my ability.

13 I FURTHER CERTIFY that I am not related to
14 any of the parties herein, nor their counsel, and have no
15 interest, financial or otherwise, in the outcome of these
16 proceedings.

17 I FURTHER CERTIFY that I am duly licensed by
18 the Tennessee Board of Court Reporting as a Licensed Court
19 Reporter as evidenced by the LCR number and expiration date
20 following my name below.

21 IN WITNESS WHEREOF, I have hereunto affixed my
22 official seal and signature this 9th day of April 2015.

23
24 ANNE S. WILSON, LCR #208
25 Expiration Date 6/30/2016
Notary Public thru 10/18/16