Exhibit 2

CIRCUIT COURT
SIXTH JUDICIAL CIRCUIT
PINELLAS COUNTY, FLORIDA

TERRY GENE BOLLEA, Professionally known as HULK HOGAN,

Plaintiff,

CASE NO. 12-01247-CI-011

vs.

HEATHER CLEM a/k/a Heather Cole, an Individual, and BUBBA THE LOVE SPONGE CLEM a/k/a Todd Alan Clem,

Defendants.		

DEFENDANT, HEATHER CLEM/COLE'S NOTICE OF SERVING ANSWERS TO PLAINTIFF, TERRY GENE BOLLEA'S FIRST SET OF INTERROGATORIES

Defendant, HEATHER CLEM / COLE, by and through the undersigned attorney, files this her Answers to Plaintiff, TERRY GENE BOLLEA's, First set of Interrogatories attached hereto, served under certificate of service dated July 18, 2013.

7. IDENTIFY all DOCUMENTS that refer or relate to all facts requested to be identified in Interrogatory Nos. 5 and 6, above.



8. STATE ALL FACTS regarding the purpose for the creation and storage of the VIDEO, including YOUR purpose, and BUBBA CLEM's purpose, for creating and storing it (such as, for example, sale or licensing to a distributor or to the public directly; personal viewing by YOU and/or BUBBA CLEM but not public sale or license; sharing with third parties (please specify) but not public sale or license, etc.)



DEFENDANT, HEATHER CLEM / COLE'S ANSWERS TO PLAINTIFF, TERRY GENE BOLLEA'S, FIRST SET OF INTERROGATORIES

- 1. Myself, Heather Clem / Cole, Terry Gene Bollea, and Todd Alan Clem.
- 2. It has happened, however, I cannot remember who with.
- 3. Unknown.
- 4. None.
- 5. None as to myself, Heather Clem / Cole.
- 6. I do not recall.
- 7. None known.
- 8. There was no intent to sell or license the video. It was created and intended for personal private use.
- 9. Unknown.
- 10. Unaware of any documents.