

## **Exhibit 3\_C**

1 IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
2 IN AND FOR PINELLAS COUNTY, FLORIDA  
3 CIVIL DIVISION

3 TERRY GENE BOLLEA,  
4 professionally known as HULK  
5 HOGAN,

6 Plaintiff,

Case No.

12-012447-CI-011

7 vs.

8 HEATHER CLEM; GAWKER MEDIA,  
9 LLC, aka GAWKER MEDIA, et  
10 al.,

11 Defendants.

12 VIDEOTAPED

13 DEPOSITION OF: BUBBA THE LOVE SPONGE CLEM

14 DATE: March 3, 2014

15 TIME: 12:09 p.m. to 3:07 p.m.

16 PLACE: Thomas & LoCicero, P.L.  
601 South Boulevard  
Tampa, Florida

17 PURSUANT TO: Notice by counsel for Defendants  
18 for purposes of discovery, use at  
19 trial or such other purposes as  
are permitted under the Florida  
Rules of Civil Procedure

20 REPORTED BY: Aaron T. Perkins, RPR  
21 Notary Public, State of  
Florida at Large

22 Volume 1  
23 Pages 1 to 182  
24  
25

1 that's what the question is, is, What did you say?

2 MR. BERRY: Right. And even if you're  
3 conveying -- and I don't want to speak for your  
4 lawyer, so -- I mean, Mr. Diaco, if you disagree  
5 with what I'm saying.

6 BY MR. BERRY:

7 Q. But once you -- but if you're describing your  
8 conversation with your wife to a third person, what she  
9 said to you is not privileged in the context of what  
10 you're then conveying onto that other person. Here,  
11 I'm just interested in finding out what you said to  
12 Hulk Hogan.

13 A. What I told Hulk -- what I told Terry was  
14 that Heather had mentioned that she'd like to sleep  
15 with him.

16 Q. What else did you tell him?

17 A. That's all I can really recall about that  
18 conversation.

19 Q. And what was his reaction?

20 A. I don't -- I don't remember.

21 Q. So tell me the circumstances of how this  
22 conversation even began.

23 A. I don't recall the circumstances of where we  
24 were or what we were doing. It just came up.

25 Q. So you don't recall whether you were at your

1 house?

2 A. No. I don't know where we were.

3 Q. And just out of the blue, you may have just  
4 said what?

5 A. I may, what I just said earlier, what I  
6 testified to. That's what I probably said.

7 Q. And you don't recall -- do you recall  
8 anything that he said in response?

9 A. No.

10 Q. Do you recall anything else that you said?

11 A. No.

12 Q. Was Heather present during this conversation?

13 A. I do not know. I don't think so.

14 Q. Did you urge him to have sex with her?

15 A. I'd say.

16 Q. How did you do that?

17 A. I don't -- I don't necessarily know the exact  
18 verbiage used.

19 Q. Like, give me a sense of what you recall  
20 saying to him.

21 A. I'm speculating at this point. I said I  
22 think I probably urged him. That's my testimony. I  
23 don't know the exact verbiage.

24 Q. Why did you urge him to have sex with her?

25 A. It was based on a conversation my wife and I

1 had.

2 Q. That she wanted to have sex with him?

3 A. Yes.

4 Q. And so you were urging him to have sex with

5 her because she had asked?

6 A. Yes.

7 Q. Any other reason?

8 A. Not that I recall.

9 Q. Was he reluctant to have sex with Heather?

10 A. I think so.

11 Q. What did he say?

12 A. Again, I don't recall the specifics of our  
13 conversation, but, you know, Terry is very cautious, as  
14 he should be, and his caution was correct.

15 Q. Had Heather pursued Hulk?

16 A. She always thought that Terry was -- was a  
17 nice guy and attractive.

18 Q. Did she pursue him sexually before you had  
19 this conversation?

20 A. I think she might have been flirty -- flirty  
21 with him, but I don't know necessarily pursued him  
22 sexually.

23 Q. But nothing in front of you that she made a  
24 pass at him?

25 A. No. I mean, you know, we're playing the

1 wordsmith games here. I mean, you know, she was always  
2 very nice and cordial to Terry, and so, I mean, you  
3 know, I wouldn't say a pass. I wouldn't say that.

4 Q. I'm going to play a track from this Exhibit  
5 53, which is this October 16th broadcast, again, Hour  
6 2, Track 2.

7 MR. BERLIN: Before we play that -- before  
8 you play that, can I just ask if you can lift --  
9 the videographer is giving us the same -- he can't  
10 see your face so much, so -- thank you. Sorry to  
11 interrupt.

12 BY MR. BERRY:

13 Q. Yeah. Actually, before I get that, how --  
14 after you had this conversation with Hulk, how  
15 quickly -- how soon after that did they have sex?

16 A. I don't know. I don't know if it was the day  
17 of, days before. I don't -- this is all so -- so long  
18 ago. I don't know.

19 Q. Do you recall having more than one  
20 conversation with him prior to them having sex?

21 A. I don't -- I can't recall the number of  
22 times, if it was one or a million. I don't know.

23 Q. Tell me, every time prior to them having sex,  
24 every time that you remember.

25 A. My testimony is I don't recall of how many

1 A. No.

2 Q. Hulk told Howard Stern that having sex with  
3 Heather was one of the worst decisions he had ever made  
4 in his life.

5 Did he tell you that?

6 A. No. But it was. It's very truthful.

7 It's -- it's -- that's very dead on.

8 Q. Prior to the tape coming out, did he ever say  
9 anything like that to you?

10 A. I think he struggled with it.

11 Q. What did he say?

12 A. I don't know. We didn't have that  
13 conversation.

14 Q. Why do you think he struggled with it?

15 A. I don't -- I just -- in my opinion, I think  
16 that he struggled with it. I think he was -- I think  
17 he was in a bad time, and -- and I preyed upon his  
18 vulnerability, and I -- I think it was a bad time for  
19 Terry.

20 Q. What do you mean by that?

21 A. I think he was going through a tough divorce,  
22 and he was just in a bad place, and I think I preyed  
23 upon his vulnerability.

24 Q. Did you know that at the time?

25 A. I knew that he was going through a tough

1 time, yeah.

2 Q. Did you know that you were preying on him?

3 A. Probably.

4 Q. But you did it anyways?

5 A. Yes.

6 Q. So thinking about this time of the -- that he  
7 was going through a time with the divorce with Linda --

8 A. Yes.

9 Q. -- does that peg this, in your mind, as to  
10 around, like, year-wise when this was?

11 A. You guys may know the specifics of that. I  
12 don't. It's all ran together. But I think -- I think  
13 it would be accurate to say that that was the time  
14 frame that we're speaking about.

15 Q. Okay.

16 A. If you have exact years and stuff, you guys  
17 may be able to validate that better than I can.

18 Q. Okay. And so as far as you know, there is  
19 only one recording of Heather and Hulk having sex?

20 A. No. There was -- there was only one  
21 recording, period, and you guys have it.

22 Q. Why -- when you -- when you mentioned the  
23 idea to Hulk about him having sex with Heather, you  
24 knew it was going to be recorded?

25 A. I don't know if I -- if I knew at that time



1 or not or it just was a spontaneous-type thing. I  
2 don't -- I can't give you my mindset as to if I had  
3 that mindset or not.

4 Q. Prior to them having sex, did you know that  
5 it was going to be recorded?

6 A. No. Again, my testimony is I didn't have  
7 that mindset per se at the time. It was a spontaneous  
8 thing. And again, my room is under surveillance at all  
9 times, so I had a certain amount of days, however long  
10 my hard drive, whether it was 14 days or 18 days, to  
11 captivate that and to save that particular thing. So  
12 my testimony would be, no, it was not premeditated at  
13 the time that I asked him. I -- I would never do that.

14 Q. Did Heather understand at that time that she  
15 was being filmed?

16 MR. DIACO: Object to the form of the  
17 question.

18 THE WITNESS: I don't know. I don't know.  
19 You might want to ask her.

20 BY MR. BERRY:

21 Q. Did you think that she knew she was being  
22 recorded?

23 A. I would assume that she did. I would say the  
24 only person who didn't know would be Terry.

25 Q. And when did -- was the first time that he

1 yesterday, Matt Loyd?

2 A. No. I have not had any contact with  
3 Mr. Houston or Mr. Hogan for a long, long time, so  
4 this -- them -- me telling -- I don't know if they have  
5 discovered what I have discovered in their due  
6 diligence, but they don't have any idea -- they may  
7 know, but it would be on their own discovery, not mine.

8 Q. Okay. But at this point, Heather knew about  
9 the tape, right?

10 A. Well, she knew -- obviously, she was in the  
11 tape, so she knew about the tape. I don't know if she  
12 knew that it had been stolen and distributed. I don't  
13 know what her mindset was there. We weren't together  
14 anymore.

15 Q. Right.

16 But you knew at that point that it had been  
17 taken out of your possession, right?

18 A. Well, obviously, yes.

19 Q. Okay. So why did you tell her that they have  
20 contacted the Florida State Attorney General and will  
21 be pressing full criminal charges?

22 A. I don't know. It probably was a conversation  
23 that Mr. -- as I said, I think you can read -- read  
24 this and maybe decipher what Mr. Houston and I spoke  
25 about. I can't testify that I can remember that

1           A.    It's just my opinion.

2           Q.    I know.  But what do you mean?

3           A.    You want my opinion on it?

4           Q.    Yeah.  How do you think that they weren't  
5 being honest?

6           A.    Well, they didn't obtain the tape in the  
7 correct manner.  They received or bought a stolen tape  
8 that was one person's property, mine, and I didn't give  
9 it to them, didn't authorize anybody to give it to  
10 them.  And so I'm not a judge or a cop, but I think if  
11 you receive stolen property and publish it or try to  
12 destroy somebody's life, that's -- I don't know what  
13 your big, fancy federal judge ruled, but that's not  
14 correct in any way, shape, or form.

15          Q.    If Gawker told folks how they obtained the  
16 tape, would they have been being honest?

17          A.    So I can go out and steal somebody's car and  
18 because I let them -- because I wrote them a letter on  
19 how I stole it, is that okay?  I mean, is that what  
20 you're saying?  Because you -- because you disclose  
21 where -- that you got it from an anonymous source?  
22 I've used that before in media.  The anonymous source  
23 kind of deal, when really I'm not man enough to tell  
24 you where I got it from and how I got it.  That doesn't  
25 make it any more right.

1 I know that there were three people that --  
2 that were on that tape, two of which knew about it, one  
3 of which didn't, and none of the three gave it to you  
4 guys, nor would ever give it to you guys. And it's  
5 destroyed all three people's lives. And two people  
6 knew about it and one didn't. I don't know where you  
7 come from, but where I come from, that's not cool.

8 Q. In your opinion, do you think that Hulk Hogan  
9 made a public spectacle of this by talking about it in  
10 the press so often?

11 A. No.

12 Q. At what point do you think -- at what point  
13 do you think that Hulk's feelings about you changed?

14 A. It doesn't matter, because his feelings -- in  
15 fact, they should have changed sooner, because I lied  
16 to him for a year about this, so it doesn't matter when  
17 his feelings about me changed. His -- his feelings  
18 about not being -- not trusting me were valid all  
19 along, so they were probably later than sooner. They  
20 should have been a lot sooner, because had I manned up  
21 and said to Terry the truth all along, you know, he  
22 would have obviously known about it sooner.

23 Q. Do you know what caused his feelings to  
24 change?

25 A. Yeah. I think that Terry was able to