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Exhibit 41_C

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Page 1	Page 3
Page 1 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, Case No. 12-012447-CI-011 vs. HEATHER CLEM; GAWKER MEDIA, LLC, aka GAWKER MEDIA, et al., Defendants. / VIDEOTAPED DEFOSITION OF: BUBBA THE LOVE SPONGE CLEM DATE: March 3, 2014 TIME: 12:09 p.m. to 3:07 p.m. PLACE: Thomas & LoCicero, P.L. 601 South Boulevard Tampa, Florida PURSUANT TO: Notice by counsel for Defendants 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	Page 3 APPEARANCES CONTINUED AS FOLLOWS: MICHAEL BERRY, ESQUIRE PAUL J. SAFIER, ESQUIRE PAUL J. SAFIER, ESQUIRE Levine Sullivan Koch & Schutz, LLP 1760 Market Street Suite 1001 Philadelphia, PA 19103 - and - SETH D. BERLIN, ESQUIRE Levine Sullivan Koch & Schutz, LLP 1899 L Street, N.W. Suite 200 Washington, D.C. 20036 - and - RACHEL E. FUGATE, ESQUIRE RACHEL E. FUGATE, ESQUIRE ACCHEL E. FUGATE, ESQUIRE RACHEL E. FUGATE, ESQUIRE ACCHEL E. FUGATE, ESQUIRE ACCHEL E. DETRICK, ESQUIRE General Counsel Gawker Media 210 Elizabeth Street Third Floor New York, New York 10012 Attorcys for Defendant Gawker Media, LLC, et al.
Florida at Large Volume 1 Pages 1 to 182 Page 2 APPEARANCES: CHARLES J. HARDER, ESQUIRE GRANCES: CHARLES J. HARDER, ESQUIRE Harder Mirell & Abrams, LLP Harder Mirell & Abrams, LLP J25 Century Park East Suite 800 Los Angeles, California 90067 - and - KENNETH G. TURKEL, ESQUIRE Bajo Cuva Cohen & Turkel, P.A. 100 North Tampa Street Suite 1900 Tampa, Florida 33602 - and - DAVID R. HOUSTON, ESQUIRE	 20 21 CONTINUED: 22 23 24 25 Page 4 1 2 MICHAEL GOLD, ESQUIRE Barry A. Cohen Law Group 3 201 East Kennedy Boulevard Suite 1000 4 Tampa, Florida 33602 5 Attorney for Defendant Heather Cole (Clem) 6 7 8 JOSEPH F. DIACO, JR., ESQUIRE Adams & Diaco, P.A. 9 101 East Kennedy Boulevard Suite 2175 10 Tampa, Florida 33602 11 Attorney for Bubba the Love Sponge Clem
Law Office of David R. Houston 12 432 Court Street Reno, Nevada 89501 13 Attorneys for Plaintiff 14 15 16 17 CONTINUED: 18 19 20 21 22 23 24 25	12 13 14 ALSO PRESENT: 15 Honorable James Case 16 Mike Byrd, videographer Terry Gene Bollea 17 18 19 20 21 22 23 24 25

32 (Pages 307 to 310)

Page 1			
1	307	Page	309
	together first come up?	1	MR. BERRY: No. With Hulk.
2	MR. DIACO: Object to the form to the extent	2	MR. DIACO: Oh, I'm sorry. I apologize.
-3	that it involves a confidential communication	3	Do you understand the question?
4	between you and Hcather. If it doesn't involve a	4	THE WITNESS: No. Could you ask
5	confidential communication between you and	5	BY MR. BERRY:
6	Heather, I think it's fair game.	(6	(Q. How did the idea of Heather having sex with)
7	THE WITNESS: It's involved a conversation	(7)	(Hulk first come up with him?)
8	that she and I had.	(8)	A. I think — I think I asked him.
9	MR. BERRY: We'll come back to this.	(9	Q. When was that?
10	MR. DIACO: Okay. Let me ask, Was there	(10:	A. Probably the day of or night of or moments
11	anyone else present when you guys had that	(11)	(before.)
12	conversation?	(12)	Q. And tell me about what you recall about that
13	THE WITNESS: No.	(13)	conversation with him?
14	MR. DIACO: Okay.	14	A. I don't really recall much, other than if he
15	BY MR. BERRY:	15	
16		(16)	(wanted to)
17	Q. Have you ever talked about that conversation?	(17)	Q. And that was the first time that you talked
17	MR. GOLD: With anybody other than your	(17)	(to him about it?)
18	lawyer?	(15) (19)	A. Yeah, the best I can yeah. The best of my
20	MR. BERRY: Yeah. Sorry.	(19) (20)	knowledge, yes.
	BY MR. BERRY:		Q. And how in the context of you-all talking did \langle
21	Q. With anybody other than your lawyer and	(21) 22	(this come up?
22	Heather?	22	A. I don't know the I don't know the
23	A. Just Heather and I.	23	situation as to how it came up or, you know
24	Q. Okay. Whose idea was it?	24	Q. Did he bring it up or did you?
25	MR. DIACO: Same objection, Judge.	25	(A. No, no. I did.)
Page	308	Page	310
1	MR. GOLD: Marital privilege,	1	Q. And what did you say to him?
2	MR. DIACO: Marital privilege.	2	A. I just said, you know, Heather has been
3	MR. BERRY: I think it's going to come out		
		3	
4	eventually here that some of this has been	3 4	MR. GOLD: Objection.
4 5	eventually here that some of this has been discussed publicly. But at that time, we'll go		MR. GOLD: Objection. MR. DIACO: Objection. Objection. Please
	discussed publicly. But at that time, we'll go	4	MR. GOLD: Objection.
5	discussed publicly. But at that time, we'll go back and revisit all of these things. But if you	4 5	MR. GOLD: Objection. MR. DIACO: Objection. Objection. Please try to
5 6	discussed publicly. But at that time, we'll go back and revisit all of these things. But if you want to assert the marital privilege, then we can	4 5 6	MR. GOLD: Objection. MR. DIACO: Objection. Objection. Please try to MR. BERRY: But he's talked about he's talked about
5 6 7	discussed publicly. But at that time, we'll go back and revisit all of these things. But if you want to assert the marital privilege, then we can move forward.	4 5 6 7	MR. GOLD: Objection. MR. DIACO: Objection. Objection. Please try to MR. BERRY: But he's talked about he's talked about MR. DIACO: Hold on a second. Hold on a
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37 (Pages 327 to 330)

 or not or if just was a spontaneous-type thing. 1 don't - I can't give you my mindest as to if I had that mindest or not. Q. Prior to them having sex, did you know that it was going to be recorded? A. No. Again, my testimony is I didn't have they would do it in the that mindest per set it them. It was a spontaneous thing. And again, my room is under surveillance at all times, so I had a certain amount of days, however long my hard drive, whether it was I days or IB days, to captivate that and to save that particular thing. So my testimony would be, no, it was not premediated at the time that a laked him. 1 - I would never do that. D. Did Heather understand at that time that she was being filmad? M. B. DIACC: Object to the form of the question. THE WITNESS: I don't know. I don't know. You might wan to ask her. Q. Did you think that she knew she was being precorder? Q. Did you think that she knew she was being precorder? Q. Did you think that she knew she was being precorder? Q. Did you think that she knew she was being precorder? Q. Did you think that ale knew she was being precorder? Q. Did you think that she knew she was being precorder? Q. Did you think that the knew she was being precorder? Q. And when did was the first time that he chonological, the way time - the way fings happened, that it went iover itself. So it was within, I would say - safely say writin 1 d days of diy you burn that DVD? A. Probably when the TMZ - I think in det secording diver knew you went different first stim lange. And then't first time that he secording diver knew you went different first stim lange. And then't first time that he secording diver knew you went different first stim lange. And then't first priority do that? Q. And when time period. J would be safe to say within that the secording these comerang days use days	rage	: 327	Page 329
2 dont – I can't give you my mindset as to if I had 3 that mindset or no. 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 1 didn't have 7 that mindset or no. 8 A. No. Again, my testimony is 1 didn't have 9 those, so I had a certain amount of days, however long 9 my had drive, wheller it was 1 days or 18 days, too 9 captivate that and to save that particular thing. So 9 my testimony would be, no, it was not premediated at 14 to time that 1 sked in it -1 - would have? 9 you might want to ask her. 9 You might want that she kenw she was being? 10 C. And when did - was the first time that he 11 You might want to ask her. 12 Q. Did you was discuss it with anybody else? 13 A. I wool dassume that she did. I woul	1	or not or it just was a spontaneous-type thing. I	¹ have checked on it a few times to make sure it was done
3 that mindset or not. 3 being transferred from hard drive to not. 4 0. Prior to them having sex, did you know that 5 5 being transferred from hard drive to not. 6 6 A. No. Again, my testimony is I didn't have 6 7 times, so I had a certain amount of days, however long 7 8 times, so I had a certain amount of days, however long 7 9 my hard drive, whether it was 1 had haves a anothat outs 7 9 captivate that and to save that preioutant fring. So 7 10 the time that a seed him. 1 – I would never do that. 13 11 the time that lasked him. 1 – I would never do that. 13 12 Q. Did Heather understand at that time that she 13 13 the WITNESS: I don't know. I don't know. 1 don't know. 1 don't know. 14 Q. Did Heather understand at that he 10 1. A. No. 15 was being filmed? A. I don't know. 1 don't know.	2		
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17 (Pages 410 to 413)

			17 (Fages 410 to 415)
Page	: 410	Page	e 412
1	chance to read the whole e-mail?	1	yesterday, Matt Loyd?
2	A. Yes.	2	A. No. I have not had any contact with
3	Q. Okay. Seeing this now, does that refresh	3	Mr. Houston or Mr. Hogan for a long, long time, so
4	your recollection about the contact that you had with	4	this them me telling I don't know if they have
5	David Houston on April 19th?	5	discovered what I have discovered in their due
6	A. No. I know that I again, as I testified	6	diligence, but they don't have any idea they may
7	earlier, I corrected myself by saying I may have had	7	know, but it would be on their own discovery, not mine.
8	conversations with Mr. Houston about this. So, no, I	8	Q. Okay. But at this point, Heather knew about
9	don't specifically remember the conversation he and	19:	(the tape, right?)
10	I Mr. Houston and I had. Obviously, if you read	(10)	A. Well, she knew obviously, she was in the
11	this, it was obviously about the this tape.	in.	tape, so she knew about the tape. I don't know if she
12	Q. Okay. So between April 19th and today, do	12	knew that it had been stolen and distributed. I don't
13	you recall the substance of any conversation that you	13	
14	had with Mr. Houston in connection with the sex tape?	14	know what her mindset was there. We weren't together
15	A. No. I have had some, but I can't recall the	15	anymore.
16	content.	16	Q. Right,
17	Q. Do you recall ever telling Mr. Houston that	17	But you knew at that point that it had been taken out of your pagegoing right?
18	you did not have any involvement in recording the tape?	18	taken out of your possession, right?
19	A. Yes.	19	A. Well, obviously, yes.
20		20	Q. Okay. So why did you tell her that they have
21	Q. What do you recall about that?	21	contacted the Florida State Attorney General and will
22	A. Let me tell you something. I have vehemently		be pressing full criminal charges?
23	denied to all of Hogan's people, whomever would listen,	22	A. I don't know. It probably was a conversation
24	that I didn't have anything to do with this,	23	that Mr as I said, I think you can read read
25	Mr. Houston, to Terry. I never spoke to Mr. Harder,	24 25	this and maybe decipher what Mr. Houston and I spoke
	per se, but predominantly Terry and Mr. Houston. I	25	about. I can't testify that I can remember that
Page	411	Page	2413
Page		Page	e 413 conversation.
	411 never, up until yesterday, really stepped up and told the truth.		conversation.
1	never, up until yesterday, really stepped up and told the truth.	1	conversation. Q. And right. I don't care about your
1 2	never, up until yesterday, really stepped up and told	1 2	conversation. Q. And right. I don't care about your conversation with Mr. Houston. I'm asking about this
1 2 3	never, up until yesterday, really stepped up and told the truth. Q. Okay. And so the story that you told	1 2 3	conversation. Q. And right. I don't care about your conversation with Mr. Houston. I'm asking about this particular sentence and why you sent it to Heather.
1 2 3 4	never, up until yesterday, really stepped up and told the truth. Q. Okay. And so the story that you told Mr. Houston up until yesterday was you had nothing to	1 2 3 4	conversation. Q. And right. I don't care about your conversation with Mr. Houston. I'm asking about this particular sentence and why you sent it to Heather. You knew that she wasn't the one who had the tape,
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29 (Pages 458 to 461)

n	458	D		
Page 458		Page 460		
1	A. It's just my opinion.	1	determine that I was that I had that I had lied	
2	Q. I know. But what do you mean?	2	to him and that I had taped this without his knowledge.	
3	A. You want my opinion on it?	3	Q. Do you know how he was able to determine	
4	Q. Yeah. How do you think that they weren't	4	that?	
5	being honest?	5	A. No. I mean, I'm sure him and his attorneys	
6	A. Well, they didn't obtain the tape in the	6	pretty much figured it out. I wasn't part of his	
7	correct manner. They received or bought a stolen tape	7	investigative team, but the truth of the matter is,	
8	that was one person's property, mine, and I didn't give	8	they are correct.	
9	it to them, didn't authorize anybody to give it to	9	Q. But you weren't the one who went and told him	
10	them. And so I'm not a judge or a cop, but I think if	LO	that?	
11	you receive stolen property and publish it or try to	LL L	A. No.	
12	destroy somebody's life, that's I don't know what	12	Q. And at that point, did it make sense to you	
13	your big, fancy federal judge ruled, but that's not	13	why he suddenly got mad at you?	
14	correct in any way, shape, or form.	14	A. Yeah, absolutely, absolutely.	
15	Q. If Gawker told folks how they obtained the	15	Q. Again, because you realized that he had	
16	tape, would they have been being honest?	16	figured it out and you had been hiding the ball all	
17	A. So I can go out and steal somebody's car and	17	along?	
18	because I let them because I wrote them a letter on	18	A. I had been I had just done two things: I	
19	how I stole it, is that okay? I mean, is that what	19	had lied to my best friend, and I had done something	
20	you're saying? Because you because you disclose	20	behind his back that at the end of day has cost him	
21	where that you got it from an anonymous source?	21	all the things he's been through in life and all the	
22	I've used that before in media. The anonymous source	22	places he's traveled, this has been, single-handedly,	
23	kind of deal, when really I'm not man enough to tell	23	one of the worst things that's ever happened to him.	
24	you where I got it from and how I got it. That doesn't	24	One of the most dirty crossed, double agent shit ever	
25	make it any more right.	25	happened to him, and that's solely on his best friend.	
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Page	459	Page 4	461	
Page	459	Page 4		
		Page 4 1 2	I'm humiliated by it.	
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1	here. I will go ahead and mark this as Exhibit 65.	1	THE WITNESS: I can't speculate. I don't	
2	(Exhibit No. 65 was marked for	2	know. I'm not a lawyer.	
3	identification.)	3	BY MR. BERRY:	
4	BY MR. BERRY;	4	Q. Did you ever after you got sued, did you	
5	Q. And I'll just tell you and I guess	5	ever have any contact with Heather about the lawsuit or	
6	Mr. Harder can correct me if I'm wrong this is a	6	the sex tape?	
7	copy of the complaint that was filed against you and	7	A. I don't think so.	
8	Heather Clem on October 15th, 2012, as it says on the	8	Q. No conversation with her?	
9	first page. If you'd like to take a minute and just	9	A. I don't think so.	
10	flip through it, you are welcome to.	10	Q. No e-mails or texts?	
11	A. Okay. I have got it.	11	A. I don't think so.	
12	Q. Have you had a chance to look at it?	12	MR. DIACO: Do you mean outside the context	
13	A. Yes.	13	of, like, normal divorce stuff?	
14	Q. And in looking at it now, do you recall ever	14	MR. BERRY: Just about the lawsuit or the sex	
15	seeing this before?	15		
16	A. Yeah. I briefly saw this when Tom had showed	16	tape.	
17	it to me.	17	MR. DIACO: Thank you for that clarification.	
18	Q. When was that?	18	THE WITNESS: I think we were going through a	
19	A. I'm assuming it was roughly a few days after	19	divorce at this time, so I don't think we spoke about this sex tape.	
20	that October 15th file date.		1	
20		20	BY MR. BERRY:	
	Q. And what did Tom tell you about the lawsuit?	21	Q. I just want to ask you about a couple	
22	A. That we, you know, needed to be concerned	22	paragraphs, and we'll just turn to page 4 here.	
23	about this. Again, I don't remember the exact	23	First, I will ask about paragraph 18. It	
24	conversation other than it was very disturbing on our	24	says: The defendants, without plaintiff's knowledge	
25	behalf.	25	and plaintiff is Hulk Hogan without his knowledge or	
Page	467	Page	469	
1	Q. In what way?	1	consent, have grossly invaded plaintiff's protected	
2	A. In the fact that I had that this lawsuit	2	rights of privacy as recognized under the United States	
3	was correct, the fact that I did the majority of what	3	Constitution, Florida Constitution, and common law, by	
4	they alleged.	4	filming plaintiff in or about 2006 engaged in	
5	Q. What did you not do that was alleged?	5	consensual intimate sexual relations with Ms. Clem in a	
6	A. I can't go point by point. I just know that	6	private bedroom.	
7	I that I recorded Mr. Hogan unbeknownst to him, and	7	Is it true that you filmed him in or about	
8	he was not aware of it, and	8	2006 engaged in consensual intimate sexual relations	
9	Q. And	9	with Ms. Clem in a private bedroom?	
10	A. That's the that's the crux of this.	10	A. Yes.	
п	Q. Did Tom Bean tell you how you should respond	11	MR, HARDER: I am going to object.	
12	to this lawsuit?	12	MR. DIACO: Join,	
13	A. I can't recall the tactics that we spoke	13	MR. HARDER: Part of that lacks foundation,	
14	about and what we needed to do.	14	assumes facts not in evidence, and it's a it's	
15	Q. Did he give this to you before or after you	15	a compound question. There are a lot of facts in	
16	went on the air?	16	there.	
17	A. Oh, I would assume that it was after we spoke	17	BY MR, BERRY:	
18	about it. He wouldn't hand me this before.	(18)	Q. Do you admit that you filmed plaintiff	
19	Q. Okay. We've talked a little bit quite a	(19)	engaged in consensual do you admit that you filmed	
20	bit about why you were sued. Do you know why why	(20)	plaintiff engaged in consensual intimate sexual	
21	Heather was sued?	(21)	relations with Ms. Clem in a private bedroom?	
22	A. No. I don't have any idea.	(22)	(MR. DIACO: Asked and answered.)	
23	Q. What do you think?	23	(THE WITNESS: Yes.	
24	MR. DIACO: Object to the form of the	24	(BY MR. BERRY:)	
	-			
25	question.	25	Q. You did that without his knowledge or	

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