

EXHIBIT 2

to the

PUBLISHER DEFENDANTS' MOTION IN LIMINE ON EVIDENCE
RELATING TO PLAINTIFF'S ADMISSION THAT HE BELIEVED
THE SEX TAPE(S) SHOWED HIM MAKING STATEMENTS THAT
HAVE BEEN MARKED AS CONFIDENTIAL

EXHIBIT TO PLAINTIFF TERRY GENE BOLLEA'S RESPONSES TO DEFENDANT NICK DENTON'S FIRST SET OF INTERROGATORIES

<u>Number</u>	<u>Name As Per Responding Party's Record or Recollection</u>	<u>Connection to Responding Party</u>	<u>Communications</u>
909-952-0505	Mike Seago	Car dealership owner in California	Responding Party does not recall discussing the listed topics with this person. Responding Party is presently unaware of any responsive text messages or iMessage communications with this person.
714-267-4652	Mike Walters	Employee at TMZ	Responding Party recalls speaking to Mr. Walters when still images of the Sex Tape were published. Responding Party further recalls speaking to Mr. Walters about the existence of the Sex Tape. Responding Party further recalls speaking to Mr. Walters, along with Harvey Levin of TMZ and Responding Party's attorney, David Houston, in a broadcast interview. Responding Party does not recall the specific details of any conversation beyond what he has already testified to during his deposition. Responding Party is presently unaware of any responsive text messages or iMessage communications with Mr. Walters.
727-424-9938	Mike Webber	TNA Wrestling publicist	Responding Party does not recall discussing the listed topics with this person. Responding Party is presently unaware of any responsive text messages or iMessage communications with this person.
727-776-5613	Patty	DMV employee	Responding Party does not recall discussing the listed topics with this person. Responding Party is presently unaware of any responsive text messages or iMessage communications with this person.
863-397-0811	Paul	Sunbed supplier	Responding Party does not recall discussing the listed topics with this person. Responding Party is presently unaware of any responsive text messages or iMessage communications with this person.
310-402-6333	Peter Young	Agent	Responding Party does not recall discussing the listed topics with this person. Responding Party is presently unaware of any responsive text messages or iMessage communications with this person.
323-272-4964	Peter Young	Agent	Responding Party does not recall discussing the listed topics with this person. Responding Party is presently unaware of any responsive text messages or iMessage communications with this person.
610-745-3813	REDACTED - Celebrity	Wrestler	Responding Party does not recall discussing the listed topics with this person. Responding Party is presently unaware of any responsive text messages or iMessage communications with this person.
321-848-3141	REDACTED - Celebrity	Wrestler	Responding Party does not recall discussing the listed topics with this person. Responding Party is presently unaware of any responsive text messages or iMessage communications with this person.
803-572-7646	REDACTED - Celebrity	Wrestler	Responding Party does not recall discussing the listed topics with this person. Responding Party is presently unaware of any responsive text messages or iMessage communications with this person.
808-520-4785	REDACTED - Celebrity	Acquaintance	Responding Party does not recall discussing the listed topics with this person. Responding Party is presently unaware of any responsive text messages or iMessage communications with this person.
781-248-4778	REDACTED - Celebrity	Wrestler	Responding Party does not recall discussing the listed topics with this person. Responding Party is presently unaware of any responsive text messages or iMessage communications with this person.
310-467-6895	REDACTED - Celebrity	Friend	Responding Party does not recall discussing the listed topics with this person. Responding Party is presently unaware of any responsive text messages or iMessage communications with this person.
910-603-6805	REDACTED - Celebrity	Wrestler	Responding Party does not recall discussing the listed topics with this person. Responding Party is presently unaware of any responsive text messages or iMessage communications with this person.
615-405-2776	REDACTED - Celebrity	Wrestler	Responding Party does not recall discussing the listed topics with this person. Responding Party is presently unaware of any responsive text messages or iMessage communications with this person.
412-297-9483	REDACTED - Celebrity	Wrestler	Responding Party does not recall discussing the listed topics with this person. Responding Party is presently unaware of any responsive text messages or iMessage communications with this person.
214-908-7222	REDACTED - Celebrity	Celebrity	Responding Party does not recall discussing the listed topics with this person. Responding Party is presently unaware of any responsive text messages or iMessage communications with this person.
808-349-8383	REDACTED - Celebrity	Celebrity	Responding Party does not recall discussing the listed topics with this person. Responding Party is presently unaware of any responsive text messages or iMessage communications with this person.
214-458-0659	REDACTED - Celebrity	Celebrity	Responding Party does not recall discussing the listed topics with this person. Responding Party is presently unaware of any responsive text messages or iMessage communications with this person.
203-536-2304	REDACTED - Celebrity	Acquaintance	Responding Party does not recall discussing the listed topics with this person. Responding Party is presently unaware of any responsive text messages or iMessage communications with this person.
704-999-8089	REDACTED - Celebrity	Wrestler	Responding Party does not recall discussing the listed topics with this person. Responding Party is presently unaware of any responsive text messages or iMessage communications with this person.
310-489-6554	REDACTED - Celebrity	Wrestler	Responding Party does not recall discussing the listed topics with this person. Responding Party is presently unaware of any responsive text messages or iMessage communications with this person.
910-584-2955	REDACTED - Celebrity	Wrestler	Responding Party does not recall discussing the listed topics with this person. Responding Party is presently unaware of any responsive text messages or iMessage communications with this person.
727-365-7174	Responding Party	Not applicable	Not applicable



TERRY BOLLEA
2111 DREW ST
CLEARWATER, FL 33765-3215

Page: A-6 of 51
Bill Cycle Date: 02/23/12 - 03/22/12
Account: 523190699373

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727 260-1182
TERRY BOLLEA

Call Detail - Continued

Time	Place Called	Number Called	Rate Code	Feature Code	Min	Airtime Charges	LD/Addl Charges
Monday, 03/05							
11:17a	CLEARW FL	727-698-2072	FN9N		1	0.00	0.00
11:18a	INCOMI CL	323-272-4964	FN9N		2	0.00	0.00
11:20a	CLEARW FL	727-698-2072	FN9N		2	0.00	0.00
11:30a	NASHVI TN	615-347-7720	FN9N		3	0.00	0.00
11:34a	CLEARW FL	727-698-2072	FN9N		1	0.00	0.00
11:35a	GRAND TX	972-567-2280	FN9N		3	0.00	0.00
11:47a	CLEARW FL	727-698-2072	FN9N		2	0.00	0.00
12:38p	MALIBU CA	310-589-0849	FN9N		2	0.00	0.00
01:02p	KEYS FL	305-395-9457	FN9N		1	0.00	0.00
01:03p	TAMPA FL	813-318-2676	FN9N		2	0.00	0.00
01:08p	CLEARW FL	727-698-2072	FN9N		2	0.00	0.00
01:23p	INCOMI CL	305-395-9457	FN9N		2	0.00	0.00
01:50p	TAMPA FL	813-318-2676	FN9N		2	0.00	0.00
02:03p	ATLANT GA	404-519-5678	FN9N		2	0.00	0.00
02:18p	MALIBU CA	310-589-0849	FN9N		2	0.00	0.00
02:54p	CLEARW FL	727-735-3072	FN9N		1	0.00	0.00
05:24p	GRAND TX	972-567-2280	FN9N		2	0.00	0.00
05:30p	ATLANT GA	404-519-5678	FN9N		2	0.00	0.00
05:36p	KEYS FL	305-395-9457	FN9N		1	0.00	0.00
05:44p	KEYS FL	305-587-9820	FN9N		1	0.00	0.00
06:09p	INCOMI CL	305-587-9820	FN9N		2	0.00	0.00
07:17p	KEYS FL	305-395-9457	FN9N		1	0.00	0.00
09:40p	KEYS FL	305-395-9457	FN9N		3	0.00	0.00
Tuesday, 03/06							
05:46a	TAMPA FL	813-286-9893	FN9N		1	0.00	0.00
07:56a	TAMPA FL	813-318-2676	FN9N		1	0.00	0.00
07:56a	TAMPA FL	813-318-2676	FN9N		2	0.00	0.00
07:58a	ORLAND FL	321-662-3433	FN9N		5	0.00	0.00
08:04a	RENO NV	775-328-1962	FN9N		14	0.00	0.00
08:18a	TAMPA FL	813-318-2676	FN9N		3	0.00	0.00
09:11a	CLEARW FL	727-698-2072	FN9N		2	0.00	0.00
10:02a	ATLANT GA	404-519-5678	FN9N		1	0.00	0.00
11:30a	CLEARW FL	727-735-3072	FN9N		2	0.00	0.00
11:31a	SEABRO TX	832-225-5226	FN9N		18	0.00	0.00
11:51a	CLEARW FL	727-735-3072	FN9N		2	0.00	0.00
12:43p	MALIBU CA	310-589-0849	FN9N		10	0.00	0.00
12:52p	BATONR LA	225-266-3724	FN9N		3	0.00	0.00
01:12p	INCOMI CL	305-587-9820	FN9N		1	0.00	0.00
01:16p	INCOMI CL	323-272-4951	FN9N		2	0.00	0.00
03:06p	CLEARW FL	727-735-3072	FN9N		8	0.00	0.00
03:26p	ANAHEI CA	714-267-4652	FN9N		6	0.00	0.00
03:34p	TAMPA FL	813-362-7792	FN9N		1	0.00	0.00
03:38p	TAMPA FL	813-362-7792	FN9N		1	0.00	0.00
03:38p	INCOMI CL	813-362-7792	FN9N		1	0.00	0.00
03:39p	TAMPA FL	813-362-7792	FN9N		1	0.00	0.00
03:39p	TAMPA FL	813-362-7792	FN9N		2	0.00	0.00
03:45p	TAMPA FL	813-362-7792	FN9N		5	0.00	0.00
05:02p	TAMPA FL	813-362-7792	FN9N		5	0.00	0.00
06:44p	CLEARW FL	727-735-3072	FN9N		2	0.00	0.00
Tuesday, 03/06 (continued)							
07:46p	INCOMI CL	305-395-9457	FN9N		5	0.00	0.00
08:05p	ANAHEI CA	714-267-4652	FN9N		12	0.00	0.00
08:39p	KEYS FL	305-395-9457	FN9N		2	0.00	0.00
08:40p	KEYS FL	305-395-9457	FN9N		1	0.00	0.00
08:47p	KEYS FL	305-395-9457	FN9N		1	0.00	0.00
08:57p	KEYS FL	305-395-9457	FN9N		1	0.00	0.00
09:11p	KEYS FL	305-587-9820	FN9N		4	0.00	0.00
10:05p	KEYS FL	305-395-9457	FN9N		1	0.00	0.00
10:09p	RENO NV	775-849-9155	FN9N		6	0.00	0.00
10:14p	KEYS FL	305-395-9457	FN9N		1	0.00	0.00
10:17p	KEYS FL	305-587-9820	FN9N		4	0.00	0.00
10:54p	KEYS FL	305-395-9457	FN9N		16	0.00	0.00
Wednesday, 03/07							
07:11a	INCOMI CL	775-771-2874	FN9N		1	0.00	0.00
07:51a	INCOMI CL	775-771-2874	FN9N		5	0.00	0.00
08:24a	BEVERL CA	310-467-6895	FN9N		8	0.00	0.00
08:36a	TAMPA FL	813-362-7792	FN9N		1	0.00	0.00
09:41a	CLEARW FL	727-735-3072	FN9N		8	0.00	0.00
11:21a	RENO NV	775-328-1960	FN9N		2	0.00	0.00
11:23a	CLEARW FL	727-735-3072	FN9N		3	0.00	0.00
11:26a	SDNG S CA	619-206-5255	FN9N		1	0.00	0.00
11:27a	CALL WAIT	775-786-4188	FN9N		1	0.00	0.00
11:27a	SDNG S CA	619-206-5255	FN9N		8	0.00	0.00
11:35a	NASHVI TN	615-347-7720	FN9N		5	0.00	0.00
11:46a	INCOMI CL	310-402-6333	FN9N		3	0.00	0.00
11:59a	BEVERL CA	310-402-6333	FN9N		1	0.00	0.00
12:18p	INCOMI CL	305-395-9457	FN9N		5	0.00	0.00
01:01p	CMTN G CA	310-400-4100	FN9N		2	0.00	0.00
01:03p	MALIBU CA	310-589-0849	FN9N		1	0.00	0.00
01:04p	CALL WAIT	310-400-4100	FN9N		3	0.00	0.00
01:34p	RENO NV	775-328-1960	FN9N		1	0.00	0.00
01:34p	RENO NV	775-771-2874	FN9N		1	0.00	0.00
01:36p	BRBN B CA	818-972-8170	FN9N		11	0.00	0.00
01:51p	RENO NV	775-771-2874	FN9N		7	0.00	0.00
01:57p	RENO NV	775-771-2874	FN9N		1	0.00	0.00
02:35p	TAMPA FL	813-362-7792	FN9N		5	0.00	0.00
03:03p	RENO NV	775-771-2874	FN9N		1	0.00	0.00
03:06p	CMTN G CA	310-400-4100	FN9N		4	0.00	0.00
03:19p	RENO NV	775-771-2874	FN9N		1	0.00	0.00
03:49p	TAMPA FL	813-362-7792	FN9N		1	0.00	0.00
03:50p	CLEARW FL	727-735-3072	FN9N		3	0.00	0.00
03:55p	CMTN G CA	310-999-2912	FN9N		2	0.00	0.00
04:35p	TAMPA FL	813-362-7792	FN9N		10	0.00	0.00
04:46p	KEYS FL	305-395-9457	FN9N		2	0.00	0.00
04:48p	CLEARW FL	727-735-3072	FN9N		2	0.00	0.00
04:52p	ANAHEI CA	714-267-4652	FN9N		9	0.00	0.00
05:00p	ANAHEI CA	714-267-4652	FN9N		1	0.00	0.00
05:01p	ANAHEI CA	714-267-4652	FN9N		2	0.00	0.00
05:03p	TAMPA FL	813-362-7792	FN9N		2	0.00	0.00
05:05p	CALL WAIT	323-680-3698	FN9N		2	0.00	0.00
05:07p	RENO NV	775-771-2874	FN9N		4	0.00	0.00
05:36p	INCOMI CL	404-519-5678	FN9N		1	0.00	0.00





TERRY BOLLEA
2111 DREW ST
CLEARWATER, FL 33765-3215

Page: A-15 of 51
Bill Cycle Date: 02/23/12 - 03/22/12
Account: 523190699373

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727 260-1182
TERRY BOLLEA

Data Detail - Continued

Time	To/From	Type/Unit	Rate Code	
Tuesday, 03/06				
06:36p	Sent 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
06:36p	Sent 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
07:01p	Rcvd 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
07:04p	Rcvd 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
07:04p	Rcvd 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
07:14p	Rcvd 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
07:54p	Sent 305-395-9457	MTM TEXT MESSAG	MSGF	0.00
08:16p	Rcvd 305-395-9457	MTM TEXT MESSAG	MSGF	0.00
08:16p	Rcvd 305-395-9457	MTM TEXT MESSAG	MSGF	0.00
08:18p	Sent 305-395-9457	MTM TEXT MESSAG	MSGF	0.00
08:21p	Rcvd 305-395-9457	MTM TEXT MESSAG	MSGF	0.00
08:22p	Rcvd 305-395-9457	MTM TEXT MESSAG	MSGF	0.00
08:23p	Sent 305-395-9457	MTM TEXT MESSAG	MSGF	0.00
08:27p	Rcvd 813-318-2676	Text Message	MSGF	0.00
09:59p	Sent 714-267-4652	Text Message	MSGF	0.00
10:01p	Rcvd 714-267-4652	Text Message	MSGF	0.00
10:02p	Rcvd 714-267-4652	Text Message	MSGF	0.00
10:50p	Rcvd 619-206-5255	Text Message	MSGF	0.00
10:53p	Rcvd 619-206-5255	Text Message	MSGF	0.00
10:54p	Rcvd 619-206-5255	Text Message	MSGF	0.00
11:15p	Rcvd 613-263-9780	INTL TXT	MSGF	0.00
11:15p	Rcvd 613-263-9780	INTL TXT	MSGF	0.00
11:46p	Sent 305-395-9457	MTM TEXT MESSAG	MSGF	0.00
11:46p	Sent 305-395-9457	MTM TEXT MESSAG	MSGF	0.00
11:46p	Sent 305-395-9457	MTM TEXT MESSAG	MSGF	0.00
Wednesday, 03/07				
01:07a	Sent 305-395-9457	MTM TEXT MESSAG	MSGF	0.00
08:39a	Rcvd 305-395-9457	MTM TEXT MESSAG	MSGF	0.00
08:39a	Rcvd 305-395-9457	MTM TEXT MESSAG	MSGF	0.00
08:39a	Rcvd 305-395-9457	MTM TEXT MESSAG	MSGF	0.00
09:21a	Sent 305-395-9457	MTM TEXT MESSAG	MSGF	0.00
09:21a	Sent 305-395-9457	MTM TEXT MESSAG	MSGF	0.00
09:25a	Sent 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
09:25a	Sent 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
09:26a	Rcvd 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
09:28a	Sent 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
09:29a	Rcvd 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
09:29a	Sent 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
09:30a	Rcvd 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
09:31a	Rcvd 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
09:31a	Rcvd 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
09:31a	Sent 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
09:32a	Sent 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
09:32a	Rcvd 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
09:32a	Rcvd 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
09:33a	Rcvd 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
09:34a	Rcvd 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
09:35a	Rcvd 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
09:36a	Rcvd 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
09:59a	Rcvd 201-618-1605	Text Message	MSGF	0.00

Time	To/From	Type/Unit	Rate Code	
Wednesday, 03/07				
11:23a	Rcvd 310-467-6895	Text Message	MSGF	0.00
11:37a	Rcvd 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
11:37a	Sent 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
11:37a	Sent 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
11:38a	Rcvd 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
11:38a	Rcvd 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
11:39a	Rcvd 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
11:42a	Rcvd 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
11:42a	Rcvd 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
11:43a	Rcvd 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
12:23p	Rcvd 727-735-3072	MTM TEXT MESSAG	MSGF	0.00
12:23p	Rcvd 727-735-3072	MTM TEXT MESSAG	MSGF	0.00
12:41p	Rcvd 813-318-2676	Text Message	MSGF	0.00
12:49p	Sent 813-318-2676	Text Message	MSGF	0.00
01:40p	Sent 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
01:40p	Sent 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
01:43p	Rcvd 305-395-9457	MTM TEXT MESSAG	MSGF	0.00
01:47p	Rcvd 813-318-2676	Text Message	MSGF	0.00
01:47p	Rcvd 813-318-2676	Text Message	MSGF	0.00
01:58p	Rcvd 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
01:58p	Rcvd 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
02:01p	Rcvd 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
02:17p	Rcvd 305-395-9457	MTM TEXT MESSAG	MSGF	0.00
02:23p	Rcvd 819-206-5255	Text Message	MSGF	0.00
02:30p	Rcvd 775-771-8822	Text Message	MSGF	0.00
03:03p	Sent 305-395-9457	MTM TEXT MESSAG	MSGF	0.00
04:26p	Rcvd 775-771-8822	Text Message	MSGF	0.00
05:10p	Rcvd 210-365-9488	Text Message	MSGF	0.00
05:10p	Rcvd 210-365-9488	Text Message	MSGF	0.00
05:10p	Rcvd 210-365-9488	Text Message	MSGF	0.00
05:10p	Rcvd 210-365-9488	Text Message	MSGF	0.00
05:28p	Rcvd 608-790-4240	Text Message	MSGF	0.00
06:28p	Rcvd 323-680-3698	Text Message	MSGF	0.00
06:49p	Sent 323-680-3698	Text Message	MSGF	0.00
06:54p	Rcvd 323-680-3698	Text Message	MSGF	0.00
06:54p	Rcvd 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
06:55p	Rcvd 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
06:57p	Rcvd 813-362-7792	MTM TEXT MESSAG	MSGF	0.00
07:29p	Rcvd 615-347-7720	MTM TEXT MESSAG	MSGF	0.00
07:35p	Sent 815-347-7720	MTM TEXT MESSAG	MSGF	0.00
07:37p	Rcvd 615-347-7720	MTM TEXT MESSAG	MSGF	0.00
07:38p	Rcvd 615-347-7720	MTM TEXT MESSAG	MSGF	0.00
07:45p	Sent 281-216-3166	MTM TEXT MESSAG	MSGF	0.00
08:32p	Rcvd 281-216-3166	MTM TEXT MESSAG	MSGF	0.00
09:16p	Sent 305-395-9457	MTM TEXT MESSAG	MSGF	0.00
09:16p	Sent 305-395-9457	MTM TEXT MESSAG	MSGF	0.00
09:16p	Rcvd 305-395-9457	MTM TEXT MESSAG	MSGF	0.00
09:17p	Rcvd 305-395-9457	MTM TEXT MESSAG	MSGF	0.00
09:18p	Rcvd 305-395-9457	MTM TEXT MESSAG	MSGF	0.00
09:30p	Rcvd 619-206-5255	Text Message	MSGF	0.00
09:33p	Sent 813-293-6991	Text Message	MSGF	0.00
09:35p	Rcvd 813-293-6991	Text Message	MSGF	0.00
11:39p	Rcvd 615-397-2912	MTM TEXT MESSAG	MSGF	0.00
Thursday, 03/08				
01:05a	Sent 714-267-4652	Text Message	MSGF	0.00

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
OF THE STATE OF FLORIDA, IN AND FOR PINELLAS COUNTY

TERRY GENE BOLLEA, professionally
known as HULK HOGAN,

Plaintiff,

No. 12-012447-CI-011

vs.

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

Defendants.
-----/

VOLUME 2

CONTINUED VIDEOTAPED

DEPOSITION OF: TERRY GENE BOLLEA

DATE: March 6, 2014

TIME: 1:58 p.m. to 5:47 p.m.

PLACE: Riesdorff Reporting Group
601 Cleveland Street
Suite 600
Clearwater, 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: Susan C. Riesdorff, RPR, CRR
Notary Public, State of
Florida

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163:16-164:4; 178:4-8,14-18 Confidential designation removed on 8/19/14 per Harder email

1 negative, positive, and never accurate.

2 BY MR. BERLIN:

3 Q. And do you know Mike Walters?

4 A. Yes, I do.

5 Q. And you, in fact, talked about him a little
6 bit earlier just before the break.

7 A. Yes.

8 Q. That's the Mike Walters you were talking
9 about?

10 A. Yes.

11 Q. And he works at TMZ?

12 A. Yes.

13 Q. And do you know Mike Walters from any other
14 place besides TMZ?

15 A. No.

16 Q. Did his father work on a business project
17 with your son?

18 A. Yes, he did.

19 Q. What was the project?

20 A. When my son was doing Precision Driving,
21 Mike Walters' dad approached Nick about doing another
22 Precision racing team.

23 Q. Do you know when that was?

24 A. Three or four years ago maybe, maybe five. I
25 don't know. It never happened.

1 Q. Just in terms of time frame, it would have
2 been before the issues surrounding the sex tape?

3 A. I have no idea.

4 Q. Well, that would be -- I mean, if this was
5 four or five years ago, that would --

6 A. I mean, I could be wrong. I'm not good with
7 time frames. All I know is a while back, a couple
8 years ago.

9 Q. All right. What kind of relationship do you
10 have with Howard Stern?

11 A. Business, see him when he's on the show. And
12 the only other time I've seen him not on the show was
13 at Bubba's wedding. And I talked to him for maybe ten
14 seconds.

15 Q. Would you consider yourself friends with
16 Howard Stern?

17 A. Friendly. I don't think we're friends.

18 Q. Are you a frequent guest on his show?

19 A. No.

20 Q. How many times would you say you've been on
21 Howard Stern's show?

22 A. Last -- I don't even know how long he's been
23 on the air. How long has he been on the air?

24 Q. A long time, it seems.

25 A. 20 years, 30 years?