

EXHIBIT 2

to the

**PUBLISHER DEFENDANTS' OPPOSITION TO
PLAINTIFF'S MOTION *IN LIMINE* NO. 6 TO EXCLUDE EVIDENCE
RELATING TO ADDITIONAL VIDEOS**

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.

CONTINUED
VIDEOTAPED

DEPOSITION OF: TERRY GENE BOLLEA

DATE: March 7, 2014

TIME: 1:50 p.m. to 5:55 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: Aaron T. Perkins, RPR
Notary Public, State of
Florida at Large

Volume 4
Pages 452 to 623

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18 CONTINUED:

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Attorneys for Defendant Gawker Media, LLC,
et al.

ALSO PRESENT:

Honorable James Case
Mike Byrd, videographer

1 had a tape of you and Heather having sex?

2 A. Correct.

3 Q. And you had no reason to think that?

4 A. Correct.

5 Q. And he had given you no reason to think that?

6 A. He gave me every reason not to think that.

7 Q. And he was, therefore, able to hide it from
8 you completely?

9 A. Yes.

10 Q. And when the images appeared on The Dirty,
11 you asked him about the tape, right, when you first saw
12 stills or were --

13 A. No. I didn't see stills on The Dirty. I
14 heard -- I heard there were still pictures surfacing.
15 I didn't know if it was dirty or clean or who had them.
16 I just asked him about them.

17 Q. And when you heard that there were stills,
18 you asked him about the -- you asked him about this,
19 right?

20 A. Yes.

21 Q. And he lied to you?

22 A. Yes. He said he didn't know anything about
23 it. He didn't take them.

24 Q. And you believed him?

25 A. Yes.

1 REPORTER'S CERTIFICATE

2
3 STATE OF FLORIDA
4 COUNTY OF HILLSBOROUGH5 I, Aaron T. Perkins, Registered Professional
6 Reporter, certify that I was authorized to and did
7 stenographically report the deposition of
8 TERRY GENE BOLLEA; that a review of the transcript was
9 requested; and that the transcript is a true and
10 complete record of my stenographic notes.11 I further certify that I am not a relative,
12 employee, attorney, or counsel of any of the parties,
13 nor am I a relative or employee of any of the parties'
14 attorney or counsel connected with the action, nor am I
15 financially interested in the action.16
17 Dated this 14th day of March, 2014.
18
1920
21 
22 Aaron T. Perkins, RPR
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24
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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.

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VOLUME 6

VIDEOTAPED

DEPOSITION OF: TERRY GENE BOLLEA

DATE: April 8, 2015

TIME: 2:19 p.m. to 4:53 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
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Pages 735 - 835

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Attorneys for Defendant Gawker Media, LLC

17

18 ALSO PRESENT:

19 Honorable James Case
20 Mike Byrd, Videographer

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1 ask the same thing?

2 MR. SULLIVAN: I'll take his answer.

3 MR. HARDER: Objection.

4 THE WITNESS: Asked and answered.

5 BY MR. SULLIVAN:

6 Q. Can you answer it?

7 A. Ask the question again.

8 Q. When you and Bubba discussed you having sex
9 with his wife Heather, did you ask him at that time if
10 he would be filming you?

11 A. I don't recall asking him that.

12 Q. Okay. Would you have any reason to ask a
13 question like that?

14 MR. HARDER: Objection to the form of the
15 question.

16 THE WITNESS: I would just answer that again,
17 he was my friend. He would never do something
18 like that.

19 BY MR. SULLIVAN:

20 Q. All right. If you go back to 12:18, the text
21 that appears at 12:18 that we were just looking at, you
22 wrote, I am not waiting for any more surprises because
23 we know there is a lot more coming.

24 Do you see that?

25 A. I'm sorry. Where was that at? I'm trying to

1 figure, is this the middle of it? Or where are we
2 looking at?

3 Q. This is the second line of that text.

4 A. Yes, I see it.

5 Q. Okay. I'm not waiting for any more surprises
6 because we know there is a lot more coming.

7 Do you see that?

8 A. Yes, sir.

9 Q. Okay. What did you mean by, we know there is
10 a lot more coming?

11 A. That's privileged.

12 Q. How so?

13 A. I heard there was a lot more coming from my
14 attorneys.

15 Q. All right. You're sharing this with Bubba.
16 That's not privileged --

17 MR. HARDER: Well --

18 BY MR. SULLIVAN:

19 Q. -- to share it with Bubba, is it?

20 MR. HARDER: Excuse -- excuse me. But if
21 there's more to it than the text and he receives
22 the more to it from his attorneys, then the more
23 to it part is privileged. The -- the words on
24 this page are not privileged, but when you ask him
25 to provide additional detail, that part's the

1 privileged part.

2 BY MR. SULLIVAN:

3 Q. Were you referring to the sex tape story?

4 MR. HARDER: Objection, privileged.

5 MR. SULLIVAN: I'm just asking him about what
6 he's telling Bubba, his friend. There's no
7 privilege there.

8 MR. HARDER: Okay. I'm -- what he told Bubba
9 is on the page and you're looking at it. If
10 there's more detail that he received from counsel,
11 then he can't talk about that because it's
12 privileged and we have to maintain it. So I'm
13 just going to instruct the witness that if the
14 additional information you learned from counsel,
15 you can't answer.

16 THE WITNESS: It is.

17 MR. SULLIVAN: All right.

18 BY MR. SULLIVAN:

19 Q. Now, at the start of the tape -- pardon me.

20 At the start of that text that we've been
21 looking at at 12:18, right, you say, we know there's
22 more than one tape out there and one that has several
23 xxxxxx slurs we're told.

24 Do you see that?

25 A. Yes.

1 Q. Okay. How many tapes did you know as of
2 October 12, 2012, were out there?

3 A. Well, that's privileged also.

4 Q. And how come?

5 A. Because my attorneys told me that --

6 MR. HARDER: Whoa. That's all you need to
7 go.

8 MR. SULLIVAN: Okay.

9 BY MR. SULLIVAN:

10 Q. Okay. Let me ask you this. Let's probe
11 that.

12 Did you learn this information in a
13 conversation with some third party and your attorney?

14 A. No.

15 Q. You only learned it from your attorney?

16 A. Yes.

17 Q. Okay. And which attorney would that be?

18 A. David Houston.

19 Q. All right. And when was that?

20 A. I don't recall.

21 Q. All right. Did you learn in your discussions
22 with Mike Walters that there was more than one sex
23 tape?

24 A. Not that I recall.

25 Q. Okay. Did you learn in your discussions with

1 anybody else at TMZ that there was more than one sex
2 tape?

3 A. No.

4 Q. All right. And when did you learn this?

5 A. I don't recall. Everything that I learned
6 about there being a sex tape happened after the
7 interview in the hotel room. Because up until then, I
8 saw a couple still pictures and Bubba was lying to me
9 that he didn't do it and Heather did it. So I thought
10 maybe there are just still pictures. So anything about
11 a sex tape happened after TMZ told David and I on the
12 phone that there was a tape going on.

13 Q. And you're -- you're telling us about this
14 interview that occurred on October 9, 2012?

15 A. Yeah, whatever that date was.

16 Q. The one when you were in New York?

17 A. Yes.

18 Q. Okay. Did you learn anything from someone
19 other than counsel about the number of sex tapes that
20 were out there?

21 A. I still don't know how many are out there.

22 Q. Okay. If you would look back at that same
23 text we were looking at, how did you know that one of
24 the tapes had several xxxxxx slurs?

25 A. That's privileged.

1 Q. You learned that from counsel?

2 A. Yes.

3 Q. All right. Did you learn information about
4 the xxxxxx slurs from Mike Walters as well?

5 A. No.

6 Q. Did you learn information about xxxxxx slurs
7 from anyone at TMZ?

8 A. No, just from counsel.

9 Q. Did you learn it from a gentleman by the name
10 of Keith Davidson?

11 A. Not to my recollection.

12 Q. Do you know who Keith Davidson is?

13 A. Yes.

14 Q. And who is he?

15 A. He is an attorney that was involved -- that
16 was involved to try to extort money from me.

17 Q. All right. When did you -- when did you deal
18 with Mr. Davidson?

19 MR. HARDER: Object to the form of the
20 question.

21 THE WITNESS: I don't understand.

22 BY MR. SULLIVAN:

23 Q. Were you told anything by Mr. Davidson
24 pertaining to this issue of there being several xxxxxx
25 slurs?

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REPORTER'S CERTIFICATE

STATE OF FLORIDA :
COUNTY OF HILLSBOROUGH :

I, Susan C. Riedsorph, RPR, CRR certify that I was authorized to and did stenographically report the deposition of TERRY GENE BOLLEA; that a review of the transcript was requested and that the transcript is a true and complete record of my stenographic notes.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the outcome of the foregoing action.

Dated this 13th day of April, 2015, IN THE CITY OF TAMPA, COUNTY OF HILLSBOROUGH, STATE OF FLORIDA.

Susan C. Riedsorph, RPR, CRR, CLSP