

# EXHIBIT 43-C

to the

**CONFIDENTIAL DECLARATION  
OF GREGG D. THOMAS  
IN SUPPORT OF PLAINTIFFS' OBJECTIONS**

TB: That's where [redacted] comes in at the end.

(IA voices in background)

b6 -2  
b7C -2

DH: That's the one that was released to GAWKER, correct?

[redacted] You know I don't quite frankly know. And I don't think the entire. I don't think it was entirely sent, it was just a clip.

DH: Right.

[redacted] Alright so you leave, she stays.

b6 -2  
b7C -2

DH: Where does [redacted] come in on this, is that number two or number three or does he show his face on this? Okay.

[redacted] There's one.

b6 -2  
b7C -2

DH: Now there's no copies ah with this? As far as.

[redacted] No this is, we, we believe that these are the originals that met and that no copies exist.

DH: Okay so in other words nobody has made any copies.

[redacted] Correct.

b6 -2  
b7C -2

DH: That you just don't have.

TB: I just have a hard time believing that [redacted] would make a copy of this shit.

DH: Well I have a hard time believing that wouldn't make a copy of it, at least to keep it somewhere in the event something happened to the originals. You'd think it would be more reasonable that they would make a copy. I mean I'd put one one place and one another place so in case something happened. I mean they valued this which they obviously did. And you're sure she's telling, I mean have you ever asked her [redacted] well it makes sense if you've got something valuable like that you'd make a copy and keep somewhere else or.

b6 -2  
b7C -2

[redacted] No but I, I've never gone that far but I've asked her and like you, look I want you, we all want you to pass this polygraph.

DH: Right.

[redacted] So are there any other copies and she said absolutely not. These are the originals, no copies were ever made and I said so if the polygrapher asks you, cause he'll

b6 -2  
b7C -2

just ask you yes or no questions. Is it true that every copy, to the best of your knowledge, that every copy of this material.

DH: (Coughs)

[redacted]

Is now in the possession of your attorney is that true, she'll say yes.

b6 -2  
b7C -2

DH: Do you know where [redacted] stole them from as far as whether he would have access to the copies if [redacted] had copies at that point?

[redacted]

Um

DH: I mean physically their location?

[redacted]

Nah I, I don't know that. I, I assumed that it was. . .

b6 -2  
b7C -2

(IA voices from video in background)

At his office.

DH: Okay so I mean possible that [redacted] access to wherever it was would have included copies if [redacted] would have had them?

b6 -2  
b7C -2

[redacted]

Yes.

(IA voices from video in background)

b6 -2  
b7C -2

A little baby wife, huh?

DH: Mm. Nice body.

TB: Definitely me.

DH: Working out.

(IA voices from video in background)

DH: I mean that's a set stage, right there under the candles.

[redacted]

Hidden behind, you know, a plant.

b6 -2  
b7C -2

DH: Yeah.

TB: Hm.

DH: Yeah but really it's a set stage, nobody.

(IA voices from video in background)

DH: Normally has their room like that.

(IA voices from video in background)

[ ]

So I don't think this is the one where he comes in.

DH: Mm. I'd like to be able to at least the more damaging part of the tape with the language (IA) so I know that's actually on there.

b6 -2  
b7C -2

[ ]

(Clears throat)

DH: Is that a number two or three?

[ ]

I thought it was two. Of course these, I don't know if we're playing these in order.

b6 -2  
b7C -2

DH: Yeah I was gonna say we all know which is which but.

[ ]

That would have been the third tape that was undated.

DH: Right, third tape.

[ ]

That's the one we haven't seen yet.

DH: Okay. Well we can talk to her depending on how well she does on polygraph TERRY about this copy issue thing and ah you know ask her if she didn't make copies, why and wasn't she worried about it and things like that, just try to get (IA) that's all we can do. Cause we get back to that original thing about [ ] not giving a damn about her and that's what worries me.

b6 -2  
b7C -2

[ ]

This is two on it, lasts eighteen seconds, we'll just skip over that one. Right this is fifty two minutes. This is tape three.

b6 -2  
b7C -2

DH: That's.

(IA voices from video in background)

DH: Here's [ ]

(IA voices from video in background)

[ ]

(IA)

(IA voices from video in background)

b6 -2  
b7C -2

DH: How do we run that?

[ ]

Do you want to fast forward it?

DH: No I just wanted (IA) I don't know where it is.

(IA voices from video in background)

[REDACTED]

I'll fast forward it to. . .

(IA voices from video in background)

b6 -2  
b7C -2

Alright this is where he says [REDACTED] (IA)

DH: Yeah [REDACTED] walks you out TERRY.

(IA voices from video in background)

[REDACTED]

I think she's just watching TV.

DH: Oh I was gonna say, who's that?

b6 -2  
b7C -2

[REDACTED]

In, in a second [REDACTED] is gonna come back in.

(IA voices from video in background)

See this is where up until this point you never really knew that she was in on it.

DH: Yeah.

[REDACTED]

And then he sees I want to watch the tape, she says you'll probably see my face in pain.

b6 -2  
b7C -2

TB: Hm.

DH: Yeah I'd say she's in on it.

TB: Wow. Can I use your bathroom?

[REDACTED]

Yep.

b6 -2  
b7C -2

DH: My God.

TB: Gee.

DH: That's bad.

TB: That's hard for me to watch thinking that that guy was my friend all those years.

DH: Yeah. It's one thing to hear about it and it's one thing to.

TB: I mean it's just like.