

# EXHIBIT 61-C

to the

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

redacted

8/11/53

Clearwater Beach, FL 33767

redacted

Terry Bollea

redacted

10/15/12

[Redacted]

David Houston  
Reno, NV

- Spoke with Pinellas - Talk to  
St. Pete

redacted

- Spoke w/ [Redacted] - St. Pete

b6 -1, 2, 4  
b7C -1, 2, 4

- State Attorney - statute problems

Houston

[Redacted]

- Interested in purchasing copy rights

- Contacted by [Redacted] has tapes

- Sex 3-4 times - make which video

- Tape had to have been before [Redacted] accident -

- Approximately 5 1/2 - 6 years  
- 2 years - Heather would make advances  
Bollea,

[Redacted]'s wife - [Redacted] files for divorce -

[Redacted] tells Bollea to come over

b6 -1, 2, 4  
b7C -1, 2, 4

[Redacted] talked - Told Heather coming over

- Bollea - "You aren't filming this are you"

- 3-4 months - all sex acts

- Pictures came out

- Called [Redacted]

- He blamed Heather

Bollea

Known security  
camera existed  
wasn't filming