

EXHIBIT 69-C

to the

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

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

Pages 155 - 311

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

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Attorney for Defendant Heather Clem

22 ALSO PRESENT:

23 Honorable James Case
24 Mike Byrd, Videographer

1 A. Yeah.

2 Q. And how many times would you say that you've
3 been in Bubba's bedroom?

4 A. No more than three.

5 Q. Did you ever notice security cameras in
6 Bubba's house?

7 A. No.

8 Q. Did Bubba ever point his cameras out to you?

9 A. Never.

10 Q. Did Bubba -- I assume, therefore, that Bubba
11 never explained to you how his security cameras worked.

12 A. I never knew he had cameras.

13 Q. Do you remember Bubba saying that people with
14 maids or nannies should have security cameras in their
15 homes?

16 A. No.

17 Q. Do you remember Bubba saying that following
18 his child custody dispute, Tom Bean told him he should
19 put cameras throughout his house so that no one could
20 accuse him of doing anything improper?

21 A. I don't remember that.

22 MR. BERLIN: We're going to listen to an
23 audio clip that is Exhibit 83.

24 (Exhibit No. 83 marked for identification.)

25 MR. BERLIN: This comes from the Bubba The

1 A. It was a situation where Bubba left me in the
2 room and Heather performed oral sex on me.

3 Q. Was anybody else at the radio station when
4 that took place?

5 A. To the best of my knowledge, no, but I didn't
6 check around. It was real late at night. I mean -- I
7 mean, it wasn't at nine o'clock at night. It was more
8 like midnight or 1:00 or 2:00 in the morning.

9 Q. Do you know whether that encounter was
10 filmed?

11 A. I have no idea.

12 Q. Do you know whether the other encounters in
13 the bedroom were filmed?

14 A. I have no idea.

15 Q. Did you ever tell anybody else about your
16 sexual encounters with Mrs. Clem?

17 A. Not that I can recall.

18 Q. Whether in the bedroom or at the radio
19 station?

20 A. Not that I can recall.

21 Q. Did anybody ever talk to you about it?

22 A. No.

23 Q. So nobody -- you didn't get the sense from
24 something anybody said to you that either Bubba or
25 Heather had told anybody else?

1 CERTIFICATE OF OATH

2
3 STATE OF FLORIDA

4 COUNTY OF HILLSBOROUGH

5
6 I, the undersigned authority, certify that TERRY
7 GENE BOLLEA personally appeared before me and was duly
8 sworn.9
10 WITNESS my hand and official seal this 11th day of
11 March, 2014.12
13
14 *Susan C. Riedorff*15
16 Susan C. Riedorff, RPR, CRR, CLSP
17 Notary Public - State of Florida
18 My Commission Expires: 6/10/13
19 Commission No.: DD 891977
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REPORTER'S CERTIFICATE

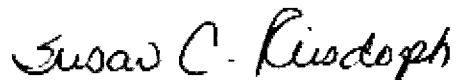
STATE OF FLORIDA :

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 11th day of March, 2014, IN THE CITY OF TAMPA, COUNTY OF HILLSBOROUGH, STATE OF FLORIDA.



Susan C. Riedsorph, RPR, CRR, CLSP

