

EXHIBIT 76-C

to the

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

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,

vs.

Case No.
12-012447-CI-011

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

Defendants.

VIDEOTAPED

DEPOSITION OF: HEATHER COLE,
formerly known as
HEATHER CLEM

DATE: January 26, 2015

TIME: 10:07 a.m. to 1:59 p.m.

PLACE: Bajo, Cuva, Cohen & Turkel, P.A.
100 North Tampa Street
Suite 1900
Tampa, Florida

PURSUANT TO: Notice by counsel for Defendant
Gawker Media, LLC, 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

Pages 1 to 125

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APPEARANCES:

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- and -

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Attorneys for Plaintiff

CONTINUED:

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APPEARANCES CONTINUED AS FOLLOWS:

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201 East Kennedy Boulevard
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Tampa, Florida 33602

Attorney for Defendant Heather Clem

ALSO PRESENT:

Mike Byrd, videographer
Terry Gene Bollea
Judge James R. Case

1 A. I did not watch it. It was brief.

2 Q. What was your response to Mr. Clem when he
3 showed you that?

4 A. I was upset.

5 Q. Do you recall what you said to Mr. Clem or
6 what Mr. Clem said to you?

7 A. I recall being upset.

8 Q. Did you shout?

9 A. I don't recall.

10 Q. I assume that you had no idea before the
11 third sexual encounter that it was going to be filmed?

12 A. Can you ask me that in a question?

13 Q. Sure.

14 Did you have any idea before the sexual
15 encounter happened that it was going to be filmed?

16 A. No.

17 Q. The first time that you learned of the
18 filming of any sexual encounter with Terry Bollea was
19 after the third encounter, correct?

20 A. Yes.

21 Q. Did you ever have any communications with
22 Terry Bollea regarding sex after the third sexual
23 encounter?

24 A. Not that I recall.

25 Q. You never told Terry Bollea that the

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CERTIFICATE OF OATH

STATE OF FLORIDA

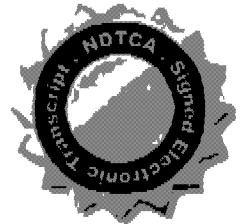
COUNTY OF HILLSBOROUGH

I, the undersigned authority, certify that
HEATHER COLE, formerly known as HEATHER CLEM,
personally appeared before me and was duly sworn.

WITNESS my hand and official seal this 30th day
of January, 2015.



Aaron T. Perkins, RPR
Notary Public - State of Florida
My Commission Expires: 2/27/2016
Commission No. EE173286



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REPORTER'S CERTIFICATE

STATE OF FLORIDA
COUNTY OF HILLSBOROUGH

I, Aaron T. Perkins, Registered Professional Reporter, certify that I was authorized to and did stenographically report the deposition of HEATHER COLE, formerly known as HEATHER CLEM; 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 action.

Dated this 30th day of January, 2015.



Aaron T. Perkins, RPR