

**CONFIDENTIAL**  
**EXHIBIT 22-C**

to the

**JOINT OPPOSITION OF THE GAWKER DEFENDANTS AND THEIR  
COUNSEL TO PLAINTIFF'S EMERGENCY MOTION TO CONDUCT  
DISCOVERY CONCERNING POTENTIAL VIOLATION OF  
PROTECTIVE ORDER, TO COMPEL TURNOVER OF CONFIDENTIAL  
DISCOVERY MATERIALS AND FOR ORDER TO SHOW CAUSE**

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 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  
Florida

Pages 735 - 835

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17  
18 ALSO PRESENT:

19 Honorable James Case  
20 Mike Byrd, Videographer  
21  
22  
23  
24  
25

1 polygraph guy was an FBI guy. He left and -- or maybe  
2 he didn't. I don't remember. But then that exchange  
3 happened because the tapes were in the room with  
4 whatever check or whatever David had. Then the FBI hit  
5 the room and all hell broke loose.

6 Q. At that point, the tapes were in the  
7 briefcase?

8 A. Yeah. It was some type of -- it looked like  
9 a carbon fiber type thing. It wasn't like a big  
10 briefcase, but it looked like some type of case, like a  
11 special case, like a bullet-proof like case or  
12 something.

13 Q. All right. If you could turn, please, back  
14 to Defendants' Exhibit 235 and look at page 1210.

15 A. 1210, okay.

16 Q. Now, this document, you'll see it's headed  
17 Exhibit B to settlement agreement. Do you see that?

18 A. Yes.

19 Q. Okay. And it appears to provide information  
20 about the content of three -- it says three reels. Do  
21 you see that at the top of the page?

22 MR. HARDER: I'm going to object, lacks  
23 foundation, hearsay. Object to the form of the  
24 question.

25 BY MR. SULLIVAN:

1 Q. All right. Do you see the portion at the top  
2 of the page that says three reels?

3 A. Yes.

4 Q. Okay. First dated July 3rd, 2007, second  
5 dated July 13, 2007, third undated. Do you see that?

6 A. Yes, I do.

7 Q. Okay.

8 A. Just one second.

9 MR. SULLIVAN: Sure.

10 THE WITNESS: Okay. Sorry.

11 BY MR. SULLIVAN:

12 Q. All right. If you would look, did the --  
13 when you were with Mr. Davidson in the room, did you  
14 see the physical copy of -- you indicated you saw your  
15 image appear. But before he put that in the device to  
16 play it, did you see any date on the physical copy of  
17 the tape?

18 A. No. I didn't see the tapes. The whole thing  
19 was so insane because when we walked in the room, it  
20 was me, Houston, and Davidson. And he goes, oh, the  
21 tapes are here. And just -- he went to the bathroom  
22 and just went in the bathroom and just left us standing  
23 there looking at tapes. I'm like, you know, this is  
24 really strange that he would walk away. He says, oh,  
25 here are the tapes, and he went right to the bathroom.

1 So all I ever saw was the case. And then I saw my  
2 image. But I didn't see the tapes or the tape or  
3 whatever he had in there.

4 Q. All right. I take it you never held them in  
5 your hand.

6 A. No. No.

7 Q. Okay. If you look, please, at the portion of  
8 the page 1210, you'll see it says first tape. Do you  
9 see that?

10 A. Yes.

11 Q. And then if you look at the -- there's a  
12 little time mark, :09 TAC enters, walks in.

13 Do you see that?

14 A. Yes.

15 Q. Below that, it says, Bostick: Good grief,  
16 Bubba. Then TAC: Isn't she beautiful?

17 Do you see that?

18 A. Yes.

19 Q. Okay. And then if you look down a little bit  
20 to the entry that's 1:15 time mark, TAC walks back in.  
21 Bostick says, wow, this is --

22 A. I'm -- I'm sorry. I don't --

23 MR. HARDER: 1:15, right there.

24 THE WITNESS: Okay, yes.

25 BY MR. SULLIVAN:

1 Q. Bostick says, wow, this is my Christmas  
2 present. TAC responds, I'm going to take a shower.

3 Do you see that?

4 A. Yes.

5 Q. Is it your understanding that TAC refers to  
6 Bubba?

7 MR. HARDER: I'm going to object. The  
8 document lacks foundation. It's hearsay. Object  
9 to the form of the question.

10 THE WITNESS: I have no idea what TAC refers  
11 to.

12 BY MR. SULLIVAN:

13 Q. Okay. Is it your understanding that Bostick,  
14 for purposes of this episode, was meant to refer to  
15 you?

16 MR. HARDER: Same objections.

17 THE WITNESS: I don't know if it refers to  
18 me. I mean, I -- I could only guess.

19 MR. HARDER: Don't guess.

20 BY MR. SULLIVAN:

21 Q. Okay. Well, if you would look at the last  
22 page of the document --

23 A. Yes.

24 Q. -- the page where you signed, you'll see your  
25 signature appears above a line that says Taryn Bostick,

1 a/k/a Terry Bollea. Do you see that?

2 A. Yes.

3 Q. So for purposes of this FBI sting, it's fair  
4 to say that Bostick was the person that you were being  
5 identified as, right?

6 MR. HARDER: I'm going to object. I think  
7 you're showing him one document that says Bostick  
8 and then you're showing him a different document  
9 that says Bostick. It's a completely different  
10 document. And I feel like you're -- you're trying  
11 to confuse him.

12 The -- the document that starts at Bollea  
13 111 -- excuse me. The document that starts Bollea  
14 1210 lacks foundation and is hearsay and it's a  
15 separate document. It's an Exhibit B to --

16 MR. SULLIVAN: It's a settlement agreement.

17 MR. HARDER: You're -- you're being very  
18 confusing. It's an Exhibit B to something that  
19 was created by somebody else who he already  
20 testified to was trying to extort money from him.  
21 And then the document that he signed is identified  
22 Bollea 1215 as a side letter agreement. And --  
23 and he signed the second page of that. So my --  
24 that's my objection for the record.

25 MR. SULLIVAN: All right. Fair enough.



1 BY MR. SULLIVAN:

2 Q. Do you know what Bubba Clem's given name was?

3 A. Bubba Clem's given name?

4 Q. Yes, sir.

5 A. No, I don't. I've heard several names.

6 Q. Did you ever hear it is Todd Alan Clem?

7 A. No, I haven't heard that.

8 Q. Okay. The exchange here that, good grief,  
9 Bubba, response, isn't she beautiful, and then further  
10 down at 1:15 where Bostick says, wow, this is my  
11 Christmas present, TAC responds, I'm going to take a  
12 shower, now, the part on, this is my Christmas present,  
13 I take it that didn't appear -- you didn't hear any of  
14 that as the tape played while you were in the front  
15 part of the room?

16 A. Excuse me?

17 Q. Did you hear any dialogue to that effect  
18 while you were in the front part of the room while the  
19 tape played?

20 A. No. I didn't hear any -- any dialogue at  
21 all.

22 Q. Okay. All right. Did one of the sexual  
23 encounters with Bubba's wife take place around  
24 Christmas?

25 A. I don't recall.

1 Q. Did one of the sexual encounters with Bubba's  
2 wife take place around or shortly after Bubba and  
3 Heather got married?

4 A. Not to my knowledge.

5 Q. All right. If you would move down to --  
6 strike that.

7 Are you aware that Mr. Davidson prepared a  
8 transcript that purported to reflect the content of the  
9 three sex tapes?

10 MR. HARDER: I'm going to object. It lacks  
11 foundation.

12 THE WITNESS: I'm not aware of any transcript  
13 that's been provided by Mr. Davidson about  
14 anything.

15 BY MR. SULLIVAN:

16 Q. All right. If you would look down at the  
17 very bottom of that page, you see the entry for 1548?

18 A. I'm sorry?

19 Q. You see the time code there 1548?

20 A. Yes.

21 Q. Okay. You see it says, F asks about pension  
22 and Bostick's family. Bostick continues that it was a  
23 slap in the face for him to be at a hotel but his  
24 family at his house.

25 Do you see that?

1 A. Yes.

2 Q. Did you talk about this with Heather during  
3 one of your sexual encounters?

4 A. I don't recall.

5 Q. Was there a time when before Linda had filed  
6 for divorce and you were living in a hotel that the  
7 rest of your family was in the family home?

8 A. I don't recall ever living in a hotel.

9 Q. All right. If you would look, please, at the  
10 next page, you'll see second tape. Did you ever watch  
11 the video of the tape that Gawker had, the one that was  
12 sent to Gawker?

13 A. No.

14 Q. Okay. Have you ever watched the excerpts  
15 that were posted online?

16 A. No.

17 Q. If you would move then, please, to the next  
18 portion on page 1212, you'll see an entry that says  
19 tape three, undated. Do you see that?

20 A. Yes.

21 Q. All right. If you could look over on the  
22 next page at 1213, there's an entry at -- the time code  
23 is 2320. You see there Bostick, MTV called my wife and  
24 said they were going to sue her. My wife texted me to  
25 say Happy Father's Day because she won't talk on the

1 phone anymore.

2 Do you see that?

3 A. Yes.

4 Q. Okay. Did you -- did you say that to Heather  
5 during one of your sexual encounters with her?

6 A. I don't recall saying that.

7 Q. Did MTV to your knowledge ever call your wife  
8 and threaten to sue?

9 A. I don't think that's possible because we  
10 never worked for MTV.

11 Q. All right. Did your then wife Linda Hogan  
12 ever text you Happy Father's Day because she refused to  
13 talk to you on the phone?

14 A. I don't recall that.

15 Q. Did -- did Linda ever work with VH1?

16 A. Yes.

17 Q. Okay. Did VH1 ever call threatening to sue?

18 MR. HARDER: I'm just going to object. If  
19 you learned any of this information from your wife  
20 at the time you were married, it's a spousal  
21 communication and it's privileged. Whether --  
22 whether it was said or not said, if you learned  
23 the information from counsel, it's privileged. If  
24 you learned the information from someone other  
25 than your then spouse or counsel, then you can

1 answer.

2 THE WITNESS: Well, then, I can't answer.

3 MR. SULLIVAN: Well, here -- what's the  
4 privilege? He's disclosed it to Heather Clem, who  
5 he's neither married to nor his lawyer as far as I  
6 know. So if there was a privilege, that cat's out  
7 of the bag. He says here, purportedly, MTV called  
8 my wife and said they were going to sue her. My  
9 wife texted me to say Happy Father's Day because  
10 she won't talk on the phone anymore.

11 MR. HARDER: Your question was about VH1  
12 actually.

13 MR. SULLIVAN: Right.

14 MR. HARDER: I didn't object when you asked  
15 about MTV. I objected when you asked about VH1.

16 MR. SULLIVAN: Okay.

17 THE WITNESS: But just to make it easy on  
18 you, I don't recall VH1 threatening to sue. They  
19 were upset because she wouldn't come to work and,  
20 you know, they said they're going to have to  
21 pursue other options. But I don't remember them  
22 ever saying they're going to sue her. They wanted  
23 me to wrap up the series without her, but I don't  
24 remember them saying, we are suing her. They may  
25 have said it to her, but they didn't say it to me.

1 I don't know. We all had individual contracts.  
2 It wasn't a family deal. Everybody had their  
3 individual contract with VH1.

4 BY MR. SULLIVAN:

5 Q. Okay. All right. If you look on down that  
6 page, you'll see the entry for 2840.

7 A. 2840, yes.

8 Q. All right. And then you see it says, the one  
9 option Brooke had, Brooke's career besides me is South  
10 Beach Records.

11 Do you see that?

12 A. Yes.

13 Q. Then there's a redaction. Then billionaire  
14 guy, I don't know if Brooke was xxxxxxxx the, redaction,  
15 guy's son, whatever. I mean, I know what is going on.  
16 I mean, I don't have double standards. I mean I'm to  
17 a -- I'm a --

18 MR. HARDER: Could be redaction.

19 BY MR. SULLIVAN:

20 Q. To a point. Xxxxxxx, redaction. But then  
21 when it comes to nice people and shit, whatever. I  
22 mean I would rather if she was gonna xxxx a, redaction,  
23 I would rather her marry an eight foot tall a hundred  
24 million basketball player.

25 Do you see that?

1 A. Yes, I do.

2 Q. Now, the Brooke referred to there, is that  
3 your daughter?

4 A. Yes.

5 MR. HARDER: Wait. Let me get some  
6 objections in. First, this document lacks  
7 foundation. This document is hearsay. You didn't  
8 prepare this document. You don't know who  
9 prepared this or what the person had in mind when  
10 they were preparing this or if they wrote the word  
11 "Brooke" if they were referring to your daughter  
12 or somebody else. So for all those reasons, I  
13 object to the entire line of questioning and to  
14 the document. I object to the form of the  
15 question as well.

16 MR. SULLIVAN: Just for the record, all you  
17 need to say is object to the form, but so be it.  
18 I think you already answered.

19 MR. HARDER: I move to strike the answer.

20 MR. SULLIVAN: What basis?

21 MR. HARDER: On the basis that it's an  
22 objectionable document, on the basis that somebody  
23 who we don't know wrote this, and you're asking  
24 him to get into the head of the person who wrote  
25 this and interpret who Brooke is.

1 BY MR. SULLIVAN:

2 Q. Let me ask you this. Do you have a daughter  
3 named Brooke?

4 A. Yes.

5 Q. Okay. Fair enough. And then what appears  
6 here next is F, who I think is female, we are all a  
7 little bit. You see that?

8 A. Yes.

9 Q. And then -- then Bostick says, Cecile  
10 xxxxxxx, redacted. He had Jamie Foxx coming in on the  
11 22nd track. I didn't even tell Brooke about it. Xxxx  
12 her.

13 Do you see that?

14 A. Yes.

15 Q. Now at 3054, Bostick, Brooke and Cecile met  
16 in Miami. Brooke xxxxx up a ten million deal I had  
17 with the Saudis. Brooke says, xxxx you, dad. She's  
18 never said that. She flipped a bird at me.

19 Do you see that?

20 A. Yes.

21 Q. Okay. Now, during one of your encounters  
22 with Heather, did you complain to her about Brooke  
23 being sexually involved with Cecile Barker's son?

24 MR. HARDER: I'm going to object. Judge  
25 Case, I think that all of this is irrelevant to



1 the claims and the defenses in the case. It has  
2 nothing to do with their defenses. It has nothing  
3 to do with our claims. If any of this ever  
4 existed, it was not played by Gawker. It was not  
5 released by them. It's not part of our case  
6 against them. It's not part of their defense  
7 against us. I think this is all a wild goose  
8 chase. And I'm going to object to this line of  
9 questioning and ask that it not be allowed to  
10 continue.

11 MR. SULLIVAN: It is part of our case against  
12 the plaintiff. It is relevant and this is  
13 discovery. You cannot cabin discovery to the  
14 stuff that you are comfortable about and the stuff  
15 you would like to permit inquiry in and throw a  
16 shroud over the rest of it. That is not how  
17 discovery works in Florida. That's not how  
18 discovery works in the rest of these United  
19 States. This is improper. You've tried to do  
20 this throughout the case. It may not at the end  
21 of the day come in, but that is not how we conduct  
22 discovery in this case.

23 MR. HARDER: Michael, I have won on all of  
24 these. That's why this says redacted, because I  
25 won on this. And when you were trying to get into

1 discovery about who else he slept with, I won on  
2 that. When you tried to get discovery about all  
3 the doctors that he's seen, I won on that. When  
4 you tried to get discovery into all of his --

5 MR. SULLIVAN: Charles --

6 MR. HARDER: Excuse me. I'm not finished --  
7 all of his tax records and financial records, I  
8 moved for protective order. I won on that. I won  
9 on all of these. So there is limitations to  
10 discovery. You're not entitled to ask him any  
11 question you want. Your questions have to focus  
12 on the claims and the defenses, and this isn't.  
13 This is part of what's objectionable. You are  
14 invading his privacy over and over and over again  
15 in this very lawsuit after having invaded his  
16 privacy in the most grotesque and objectionable  
17 and outrageous way in the world. And the fact  
18 that you're continuing this -- for two and a half  
19 years you're still at it -- is highly  
20 objectionable.

21 MR. SULLIVAN: It's not objectionable.  
22 You -- look, you sue folks and you want a hundred  
23 million dollars. Guess what? You gotta then  
24 allow some reasonable discovery.

25 THE COURT: How is this at all relevant to

1 your defenses in the case?

2 MR. SULLIVAN: It is relevant because we  
3 think that what's going on here is that this is  
4 the linchpin. We don't think that this plaintiff  
5 is as aggrieved as he has said about the sex  
6 business. He's out there talking about sex on all  
7 manner of times and occasions repeatedly. And he  
8 doesn't sue in a fashion that -- somebody who is  
9 as upset about sex as he purports to be would have  
10 taken more expeditious steps to file suit. It is  
11 not until he finds out the content of this  
12 material is when he gets motivated, things go into  
13 high gear, and suddenly this becomes World War  
14 III. That is part of what -- our theory of what  
15 explains what's going on here. We think all of  
16 this sex business is an effort to throw a shroud  
17 over something, and what he's really upset about  
18 is the xxxxxx material, and that is part of our  
19 case. We will present that to the jury, or we  
20 will seek to. And you may win at the end of the  
21 day, but we are entitled to take the discovery.  
22 You've already got it under a protective order.

23 MR. HARDER: Thank you.

24 MR. SULLIVAN: So you can't say --

25 MR. HARDER: Thank you. It's already a

1 protective order. I'd like a ruling on this.

2 THE COURT: Well, my point is the same point  
3 that I made during the original depositions, and  
4 that is, when this document surfaced and this  
5 issue surfaced, nobody could tell me who created  
6 this document. Nobody could tell me where the  
7 document came from. Nobody can tell me who --  
8 anything about this document. So I don't know how  
9 this document is ever going to see the light of  
10 day.

11 MR. SULLIVAN: It may not at the end of the  
12 day, but you have to allow us to take the  
13 discovery, Your Honor. You can't cut us off here.  
14 Now we're asking him questions about did your  
15 daughter in fact date this fellow and they throw a  
16 flag on that and say you can't ask him that  
17 question.

18 MR. HARDER: Absolutely. What does that have  
19 to do with the case?

20 MR. SULLIVAN: The whole point here is there  
21 are these three sex tapes.

22 MR. HARDER: No, they're not. You don't know  
23 what you're talking about.

24 MR. SULLIVAN: That isn't decided yet either,  
25 but that's still in play.

1 MR. HARDER: Are you counsel for the  
2 extortionist? Who else would know?

3 MR. SULLIVAN: No.

4 MR. HARDER: Or the FBI, are you counsel for  
5 the FBI? Because those are the only two people  
6 who seem to know.

7 MR. SULLIVAN: Right, but we are permitted to  
8 take the discovery.

9 THE COURT: Your client said that there was  
10 only one sex tape that they got a piece of.

11 MR. SULLIVAN: Only one sent to us.

12 THE COURT: Well, then, how is it relevant to  
13 go into fictitious number two or number three?

14 MR. SULLIVAN: Fictitious number two or  
15 number three, that's not been established yet.

16 THE COURT: No, nowhere in the proof that  
17 I've seen.

18 MR. SULLIVAN: Well, we're going to take  
19 David Houston's deposition on Friday.

20 THE COURT: Well --

21 MR. HARDER: What do you think David Houston  
22 is going to say?

23 MR. SULLIVAN: I have no idea.

24 THE COURT: Anyway, I've been consistent on  
25 this issue. Anything related to the facts of the

1           allegations that come out of this terrible  
2           document that nobody knows where it came from,  
3           nobody knows who drafted it, its source, or  
4           anything else is forbidden. It's the same -- I  
5           think Judge Campbell has sided with me on that  
6           already. So I'm going to sustain the objection.

7           MR. SULLIVAN: So you're cutting off inquiry  
8           again?

9           THE COURT: I'm cutting off inquiry on this  
10          document. You've had great leeway over this whole  
11          afternoon in terms of getting into the texts and  
12          that kind of stuff that wasn't gone into before,  
13          which was fine. Now you're going back into the  
14          same area basically that was discovered back in  
15          March a year ago and it was covered thoroughly by  
16          Seth at that time. We kind of got into this  
17          push-pull back then. I think I cautioned  
18          everybody that this thing is nuclear and it needs  
19          to -- it needs not to see the light of day unless  
20          anything can be substantiated or proven that it  
21          actually existed other than in the mind of  
22          somebody who is doing blackmail against  
23          Mr. Bollea.

24          MR. SULLIVAN: You won't let us ask a  
25          question whether some of the facts that are

1 reflected herein are in fact true?

2 THE COURT: You already asked a lot of those,  
3 but if you want to ask him anything unrelated to  
4 that, you can.

5 MR. SULLIVAN: Unrelated to that? Why can't  
6 I ask him whether his daughter was in fact dating  
7 this fellow's son?

8 THE COURT: What relevance is that?

9 MR. SULLIVAN: You don't know at this point.

10 MR. HARDER: You don't know, that's the  
11 problem.

12 THE COURT: It's a fictitious allegation.

13 MR. SULLIVAN: How can you say it's a  
14 fictitious allegation? Let him answer the  
15 question.

16 THE COURT: It's a fictitious document.

17 MR. SULLIVAN: What do you mean it's a  
18 fictitious document? It's part of this FBI sting  
19 operation.

20 THE COURT: Did the FBI create that?

21 MR. SULLIVAN: I doubt it.

22 THE COURT: I doubt it, too.

23 MR. SULLIVAN: I think Mr. Davidson did.  
24 Mr. Harder is working his level best to stop us  
25 from getting Davidson's testimony.

1 MR. HARDER: Because it is ridiculous. It  
2 has nothing to do with the claims. It has nothing  
3 to do with the defenses. You have no defenses,  
4 and you're going after garbage. That's the  
5 problem. You're trying to invade his privacy over  
6 and over. I think you're committing extortion in  
7 some ways in the way that you're talking about how  
8 you intend to use this stuff, notwithstanding the  
9 fact that it's already been sustained three times  
10 by Judge Campbell and by Judge Case and you won't  
11 get off of it. So I -- it's very problematic.  
12 I've given you a lot of leeway, but I have to draw  
13 the line somewhere.

14 THE COURT: You'll have a chance probably to  
15 reargue this on a motion in limine in front of  
16 Judge Campbell.

17 MR. SULLIVAN: I suspect. Here's the rub.

18 THE WITNESS: Is this the same thing that got  
19 threatened a week ago?

20 MR. HARDER: Are we still on?

21 MR. SULLIVAN: We still need to take the  
22 discovery. So then what are we going to do,  
23 reopen his deposition once where we prevail on  
24 that motion? That's the rub.

25 THE COURT: Maybe. I just doubt that will



1           happen.

2           MR. SULLIVAN: All right.

3           MR. HARDER: So, Your Honor, I understand  
4 your ruling is that any more questioning on this  
5 document that's an exhibit to the -- is no longer  
6 permissible.

7           THE COURT: If you want to proffer your  
8 questions, go ahead. If he chooses to let them be  
9 answered, you may.

10          MR. HARDER: Okay.

11          MR. SULLIVAN: All right.

12          THE WITNESS: So let me understand. What am  
13 I --

14          MR. HOUSTON: Don't do anything.

15          THE WITNESS: Don't do anything?

16          MR. HARDER: Just wait. I'll let you know.

17 BY MR. SULLIVAN:

18          Q. Did you ever complain to Heather during one  
19 of your sexual encounters about Brooke being sexually  
20 involved with Cecile Barker's son?

21          MR. HARDER: I'm going to object.

22          THE COURT: Sustained.

23 BY MR. SULLIVAN:

24          Q. Who is Cecile Barker?

25          MR. HARDER: I'm going to object.

1 BY MR. SULLIVAN:

2 Q. Is Cecile Barker an African-American?

3 MR. HARDER: I'm going to object.

4 BY MR. SULLIVAN:

5 Q. Does Cecile Barker have a son named Yannique?

6 MR. HARDER: I object.

7 THE COURT: Sustained.

8 BY MR. SULLIVAN:

9 Q. Does his son also go by the name Stacks?

10 MR. HARDER: I object.

11 BY MR. SULLIVAN:

12 Q. Were Brooke and Yannique romantically  
13 involved at one point to your knowledge?

14 MR. HARDER: I object.

15 THE COURT: Sustained.

16 BY MR. SULLIVAN:

17 Q. During one of your encounters with Heather  
18 did you use the X word to refer to Cecile Barker?

19 MR. HARDER: I object.

20 THE COURT: Sustained.

21 MR. HARDER: You're in violation of a  
22 protective order that's been affirmed three times.

23 BY MR. SULLIVAN:

24 Q. During one of your encounters with Heather,  
25 did you refer to Cecile's son as an X word?

1 MR. HARDER: I object.

2 THE COURT: Sustained.

3 BY MR. SULLIVAN:

4 Q. Did you express to Heather that you did not  
5 like your daughter dating black folks?

6 MR. HARDER: I object.

7 THE COURT: Sustained.

8 BY MR. SULLIVAN:

9 Q. Did you express to Heather that you were a  
10 xxxxxx to a point?

11 MR. HARDER: I object.

12 THE COURT: Sustained.

13 BY MR. SULLIVAN:

14 Q. Do you know a Mohammed Kashani?

15 MR. HARDER: I object.

16 THE COURT: Sustained.

17 BY MR. SULLIVAN:

18 Q. Do you know a Donna Kashani?

19 MR. HARDER: I object.

20 THE COURT: Sustained.

21 BY MR. SULLIVAN:

22 Q. Were those the Saudis you were trying to work  
23 out a ten million dollar deal with?

24 MR. HARDER: I object.

25 THE COURT: Sustained.

1 BY MR. SULLIVAN:

2 Q. Did your daughter mess up that deal at some  
3 point?

4 MR. HARDER: I object.

5 THE COURT: Sustained.

6 BY MR. SULLIVAN:

7 Q. All right. If you would look at the next  
8 page of the document, you see an entry there at 4030,  
9 time code 4030? It says Bostick: Dude, the only thing  
10 I'll ask you -- and I don't know how you'll pull this  
11 off -- if I'm ever on my death bed, don't let Linda  
12 come and see me.

13 MR. HARDER: Object.

14 BY MR. SULLIVAN:

15 Q. Do you see that?

16 THE COURT: Sustained.

17 MR. SULLIVAN: I can't ask about that?

18 THE COURT: No.

19 MR. SULLIVAN: All right.

20 BY MR. SULLIVAN:

21 Q. Time code 41, TAC and wife then give Bostick  
22 a thank you card to Linda Bostick to give to Linda for  
23 the wedding. Do you see that?

24 MR. HARDER: Objection.

25 THE COURT: Sustained.

1 MR. SULLIVAN: Why can't we ask that?

2 THE COURT: We don't even know that the tape  
3 exists. We don't know who created this document.  
4 We don't know anything about it.

5 MR. SULLIVAN: Right.

6 BY MR. SULLIVAN:

7 Q. Here's my question. What I want to know is  
8 after one of the sexual encounters with Heather, did  
9 Bubba and Heather give you a thank you card to take to  
10 Linda for the wedding present you gave them?

11 A. Am I supposed to answer that?

12 MR. HARDER: I'll allow it.

13 THE WITNESS: I don't recall.

14 BY MR. SULLIVAN:

15 Q. Did one of your sexual encounters with  
16 Heather take place shortly after Bubba and Heather's  
17 wedding?

18 THE VIDEOTAPE SPECIALIST: Off the record.

19 (Discussion off the record.)

20 THE VIDEOTAPE SPECIALIST: On the record at  
21 4:52.

22 MR. HARDER: My objection is asked and  
23 answered. You already asked that question.

24 THE WITNESS: Asked and answered.

25 BY MR. SULLIVAN:

1 Q. Can you answer?

2 A. Could you repeat my answer, please.

3 MR. HARDER: Go ahead.

4 THE WITNESS: I don't recall.

5 MR. SULLIVAN: Thank you very much. I have  
6 no further questions of this witness at this time.

7 THE VIDEOTAPE SPECIALIST: Off the record at  
8 4:53.

9 (Deposition concluded at 4:53 p.m.)

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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