

# EXHIBIT 29

to the

**THE GAWKER DEFENDANTS' MOTION TO DISMISS  
ON THE GROUNDS OF FRAUD ON THE COURT**

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

## 1 APPEARANCES:

2 CHARLES J. HARDER, ESQUIRE  
3 KIMBERLINA MCKINNEY, ESQUIRE  
4 Harder Mirell & Abrams, LLP  
5 1925 Century Park East  
6 Suite 800  
7 Los Angeles, California 90067

8 - and -

9 DAVID R. HOUSTON, ESQUIRE  
10 Law Office of David R. Houston  
11 432 Court Street  
12 Reno, Nevada 89501  
13 Attorneys for Plaintiff  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

## 1 APPEARANCES (continued):

2 SETH D. BERLIN, ESQUIRE  
3 Levine Sullivan Koch & Schulz, LLP  
4 1899 L Street, N.W.  
5 Suite 200  
6 Washington, D.C. 20036

7 - and -

8 MICHAEL BERRY, ESQUIRE  
9 PAUL J. SAFIER, ESQUIRE  
10 Levine Sullivan Koch & Schulz, LLP  
11 1760 Market Street  
12 Suite 1001  
13 Philadelphia, Pennsylvania 19103

14 - and -

15 RACHEL E. FUGATE, ESQUIRE  
16 Thomas & Locicero, P.L.  
17 601 South Boulevard  
18 Tampa, Florida 33606

19 - and -

20 HEATHER DIETRICK, ESQUIRE  
21 General Counsel  
22 Gawker Media  
23 210 Elizabeth Street  
24 Third Floor  
25 New York, New York 10012  
Attorneys for Defendant Gawker Media, LLC

MICHAEL GOLD, ESQUIRE  
Barry A. Cohen Law Group  
201 East Kennedy Boulevard  
Suite 1000  
Tampa, Florida 33602  
Attorney for Defendant Heather Clem

## 22 ALSO PRESENT:

23 Honorable James Case  
24 Mike Byrd, Videographer

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?

## REPORTER'S CERTIFICATE

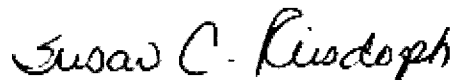
STATE OF FLORIDA :

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

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,

Case No.  
12-012447-CI-011

vs.

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

Defendants.

---

CONTINUED  
VIDEOTAPED

DEPOSITION OF: TERRY GENE BOLLEA

DATE: March 7, 2014

TIME: 1:50 p.m. to 5:55 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: Aaron T. Perkins, RPR  
Notary Public, State of  
Florida at Large

Volume 4  
Pages 452 to 623

1 APPEARANCES:

2

3 CHARLES J. HARDER, ESQUIRE  
4 KIMBERLINA N. MCKINNEY, ESQUIRE  
5 Harder Mirell & Abrams, LLP  
6 1925 Century Park East  
7 Suite 800  
8 Los Angeles, California 90067

9

- and -

10

11 DAVID R. HOUSTON, ESQUIRE  
12 Law Office of David R. Houston  
13 432 Court Street  
14 Reno, Nevada 89501

15

Attorneys for Plaintiff

16

17

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19 CONTINUED:

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23

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25



1 APPEARANCES CONTINUED AS FOLLOWS:  
2

3 MICHAEL BERRY, ESQUIRE  
4 PAUL J. SAFIER, ESQUIRE  
5 Levine Sullivan Koch & Schulz, LLP  
6 1760 Market Street  
7 Suite 1001  
8 Philadelphia, PA 19103

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10 SETH D. BERLIN, ESQUIRE  
11 Levine Sullivan Koch & Schulz, LLP  
12 1899 L Street, N.W.  
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14 Washington, D.C. 20036

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16 GREGG D. THOMAS, ESQUIRE  
17 Thomas & Locicero, PL  
18 601 South Boulevard  
19 Tampa, Florida 33606

20 - and -

21 HEATHER L. DIETRICK, ESQUIRE  
22 General Counsel  
23 Gawker Media  
24 210 Elizabeth Street  
25 Third Floor  
New York, New York 10012

Attorneys for Defendant Gawker Media, LLC,  
et al.

ALSO PRESENT:

Honorable James Case  
Mike Byrd, videographer

1           A.    I sent it -- I pushed the edit thing on my  
2 text, and then pushed circle, and then I pushed  
3 forward, and then I put David Houston's cell in there.

4           Q.    Do you know what kind -- do you know what  
5 kind of cell phone David Houston has?

6           A.    I don't have a clue.

7           Q.    Okay. Did you make any complaints to any law  
8 enforcement in connection with the sex tape?

9           MR. HARDER: Asked and answered.

10          THE WITNESS: I never did personally.

11 BY MR. BERLIN:

12          Q.    And did you make -- did anyone on your behalf  
13 make complaints to law enforcement?

14          A.    Yes.

15          Q.    Who did that?

16          A.    To the best of my knowledge, David Houston.

17          Q.    And who was the complaint made to?

18          MR. HARDER: I'm going to have to instruct  
19 you that it's privileged if you learned it from  
20 David Houston.

21          THE WITNESS: It's privileged.

22 BY MR. BERLIN:

23          Q.    Did you ever speak with anybody at a law  
24 enforcement agency about the sex tape?

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

1 with the sex tape?

2 A. I have no clue.

3 Q. Okay. Let me ask you -- just one second.

4 Let me ask you, unless it's otherwise  
5 privileged, do you have any understanding of what  
6 your -- the complaint on your behalf was about? Was it  
7 about making the tape, distributing the tape, or  
8 something else?

9 MR. HARDER: I'm going to object, privileged.

10 I instruct you not to answer.

11 THE WITNESS: Privileged.

12 BY MR. BERLIN:

13 Q. You don't know that information from any  
14 other source but your lawyers?

15 MR. HARDER: I'm going to object, privileged.

16 It's law enforcement privilege, and it's -- if it  
17 comes from lawyers, it's attorney-client  
18 privilege. But, otherwise, it's law enforcement  
19 privilege, so I'm instructing him not to answer.

20 BY MR. BERLIN:

21 Q. All right. Let me show you what I'm going to  
22 mark as Exhibit 102.

23 (Exhibit No. 102 was marked for  
24 identification.)

25 THE WITNESS: Are we done with this?

1 MR. HARDER: Objection. Privileged.

2 Well --

3 BY MR. BERLIN:

4 Q. How is that privileged if it's outside the  
5 investigation?

6 A. I --

7 MR. HARDER: Wait. Just --

8 MR. BERLIN: Give them a chance.

9 MR. HARDER: If you know outside of the law  
10 enforcement criminal investigation and outside of  
11 your communications from David Houston and myself,  
12 so if you know completely independently from all  
13 those things, then go ahead.

14 THE WITNESS: Are we asking anything about  
15 KD?

16 BY MR. BERLIN:

17 Q. Yes.

18 A. Or an associate of KD?

19 Q. KD.

20 A. I have never heard of a name like that  
21 before. I have heard of JB or MJ or -- but never KD.

22 Q. Have you ever heard of a person called Keith  
23 Davidson?

24 A. Not to my recollection.

25 Q. How about VD, the next line?

1 A. VD?

2 Q. VD, where it said -- right here, VD, where it  
3 says associate of KD. You see where I'm pointing?

4 A. Yes.

5 Q. Okay. And, again, I have the same question.  
6 Outside of anything your attorneys ever told you and  
7 outside of anything that you learned in connection with  
8 a law enforcement investigation, do you know who VD is?

9 A. No.

10 Q. Have you ever heard the name Vilma Duarte?

11 A. No.

12 Q. Without telling me their contents, have you  
13 ever seen any documents pertaining to the FBI's  
14 criminal investigation?

15 MR. HARDER: I'm going to object. It's  
16 privileged.

17 MR. BERLIN: Again, the privilege would be  
18 the FBI privilege -- I mean, the law enforcement  
19 privilege that you're asserting?

20 MR. HARDER: That, and also attorney-client  
21 privilege, both.

22 JUDGE CASE: I think the way the question was  
23 phrased, I respectfully disagree with you. It's a  
24 yes or no question. Have you seen any documents  
25 relating --

1 MR. HARDER: Okay.

2 JUDGE CASE: I mean, that's --

3 MR. HARDER: Okay.

4 MR. BERLIN: That's not any different than  
5 asking, Have you spoken with your attorney? which  
6 you can answer, even if you say tell me what the  
7 communications are.

8 JUDGE CASE: Right.

9 THE WITNESS: Would you repeat the question,  
10 please?

11 MR. BERLIN: Would you read it back? I liked  
12 the way I phrased it.

13 (A portion of the record was read by the  
14 reporter.)

15 THE WITNESS: No.

16 BY MR. BERLIN:

17 Q. Have you ever heard the name Sarah Sweeney  
18 before?

19 A. Not that I can recall.

20 Q. Have you ever heard the name Robert -- Robert  
21 Masochowski before?

22 MR. HARDER: And, again, outside of the  
23 criminal investigation, outside of communications  
24 with your counsel.

25 THE WITNESS: I don't recall hearing the name

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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 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 action.

Dated this 14th day of March, 2014.

  
\_\_\_\_\_  
Aaron T. Perkins, RPR

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
OF THE STATE OF FLORIDA, IN AND FOR PINELLAS COUNTY

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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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APPEARANCES:

CHARLES J. HARDER, ESQUIRE  
Harder Mirell & Abrams, LLP  
1925 Century Park East  
Suite 800  
Los Angeles, California 90067  
- and -

KENNETH G. TURKEL, ESQUIRE  
Bajo Cuva Cohen & Turkel, P.A.  
100 North Tampa Street  
Suite 1900  
Tampa, Florida 33602  
- and -

DAVID R. HOUSTON, ESQUIRE  
Law Office of David R. Houston  
432 Court Street  
Reno, Nevada 89501  
Attorneys for Plaintiff

MICHAEL SULLIVAN, ESQUIRE  
Levine Sullivan Koch & Schulz, LLP  
1899 L Street, N.W.  
Suite 200  
Washington, D.C. 20036  
- and -

PAUL J. SAFIER, ESQUIRE  
Levine Sullivan Koch & Schulz, LLP  
1760 Market Street  
Suite 1001  
Philadelphia, Pennsylvania 19103  
Attorneys for Defendant Gawker Media, LLC

ALSO PRESENT:

Honorable James Case  
Mike Byrd, Videographer

1 backwards, do you know roughly how many weeks or months  
2 that would have been before this meeting at the Sand  
3 Pearl?

4 A. No.

5 Q. Okay. It would appear that in this e-mail,  
6 Mr. Shearn or Agent Shearn is setting up the  
7 arrangements for the meeting that was going to take  
8 place at the Sand Pearl. Is that your understanding?

9 A. Yes.

10 Q. And he indicates there a few lines up from  
11 the bottom, he says, we will bring a portable DVD  
12 player to view the tapes.

13 Do you see that?

14 A. Yes.

15 Q. Did you view the DVDs obtained from  
16 Mr. Davidson that day?

17 A. No, I didn't. I saw my image on a screen and  
18 I said, that's me. And that's -- I refused to watch  
19 the tape.

20 Q. When -- so he did bring a DVD player?

21 A. Who's he?

22 Q. Agent Shearn.

23 A. I don't recall if he did or not.

24 Q. Okay. But the tapes were played at some  
25 point; you identified your image briefly?

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           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.

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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