

EXHIBIT 2

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.
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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:

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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
25

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?

REPORTER'S CERTIFICATE

1
2
3 STATE OF FLORIDA :

4 COUNTY OF HILLSBOROUGH :

5
6
7 I, Susan C. Riesdorph, RPR, CRR certify that I
8 was authorized to and did stenographically report the
9 deposition of TERRY GENE BOLLEA; that a review of the
10 transcript was requested and that the transcript is a
11 true and complete record of my stenographic notes.

12 I further certify that I am not a relative,
13 employee, attorney, or counsel of any of the parties,
14 nor am I a relative or employee of any of the parties'
15 attorney or counsel connected with the action, nor am I
16 financially interested in the outcome of the foregoing
17 action.

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

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Susan C. Riesdorph

Susan C. Riesdorph, 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

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1 APPEARANCES CONTINUED AS FOLLOWS:

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Attorneys for Defendant Gawker Media, LLC,
et al.

ALSO PRESENT:

Honorable James Case
Mike Byrd, videographer

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?

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
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Rules of Civil Procedure

REPORTED BY: Susan C. Riesdorff, RPR, CRR
Notary Public, State of
Florida

Pages 735 - 835

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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 PLEASE ATTACH TO THE DEPOSITION OF TERRY GENE BOLLEA,
2 VOLUME 5 TAKEN ON APRIL 8, 2015 IN THE CASE OF BOLLEA
V. GAWKER, ET AL.

3 PAGE LINE CORRECTION AND REASON THEREFOR

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19 I HAVE READ THE FOREGOING PAGES AND, EXCEPT FOR ANY
20 CORRECTIONS OR AMENDMENTS INDICATED ABOVE, I HEREBY
SUBSCRIBE TO THE ACCURACY OF THIS TRANSCRIPT.

21

22

TERRY GENE BOLLEA DATE

23

24

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WITNESS TO SIGNATURE DATE