

EXHIBIT 13

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: BUBBA THE LOVE SPONGE CLEM

DATE: March 4, 2014

TIME: 12:07 p.m. to 3:10 p.m.

PLACE: Thomas & LoCicero, P.L.
601 South Boulevard
Tampa, 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 3
Pages 346 to 519

1 APPEARANCES:

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

7 - and -

8 KENNETH G. TURKEL, ESQUIRE
9 Bajo Cuva Cohen & Turkel, P.A.
10 100 North Tampa Street
11 Suite 1900
12 Tampa, Florida 33602

13 - and -

14 DAVID R. HOUSTON, ESQUIRE
15 Law Office of David R. Houston
16 432 Court Street
17 Reno, Nevada 89501

18 Attorneys for Plaintiff

19
20 CONTINUED:
21
22
23
24
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

9 - and -

10 SETH D. BERLIN, ESQUIRE
11 Levine Sullivan Koch & Schulz, LLP
12 1899 L Street, N.W.
13 Suite 200
14 Washington, D.C. 20036

15 - and -

16 RACHEL E. FUGATE, 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

CONTINUED:

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

MICHAEL GOLD, ESQUIRE
Barry A. Cohen Law Group
201 East Kennedy Boulevard
Suite 1000
Tampa, Florida 33602

Attorney for Defendant Heather Cole (Clem)

JOSEPH F. DIACO, JR., ESQUIRE
Adams & Diaco, P.A.
101 East Kennedy Boulevard
Suite 2175
Tampa, Florida

Attorney for Bubba the Love Sponge Clem

ALSO PRESENT:

Honorable James Case
Mike Byrd, videographer
Terry Gene Bollea

1 Q. In what way?

2 A. In the fact that I had -- that this lawsuit
3 was correct, the fact that I did the majority of what
4 they alleged.

5 Q. What did you not do that was alleged?

6 A. I can't go point by point. I just know that
7 I -- that I recorded Mr. Hogan unbeknownst to him, and
8 he was not aware of it, and --

9 Q. And --

10 A. That's the -- that's the crux of this.

11 Q. Did Tom Bean tell you how you should respond
12 to this lawsuit?

13 A. I can't recall the tactics that we spoke
14 about and what we needed to do.

15 Q. Did he give this to you before or after you
16 went on the air?

17 A. Oh, I would assume that it was after we spoke
18 about it. He wouldn't hand me this before.

19 Q. Okay. We've talked a little bit -- quite a
20 bit -- about why you were sued. Do you know why -- why
21 Heather was sued?

22 A. No. I don't have any idea.

23 Q. What do you think?

24 MR. DIACO: Object to the form of the
25 question.

1 REPORTER'S CERTIFICATE

2 STATE OF FLORIDA
3 COUNTY OF HILLSBOROUGH

4
5 I, Aaron T. Perkins, Registered Professional
6 Reporter, certify that I was authorized to and did
7 stenographically report the deposition of
8 BUBBA THE LOVE SPONGE CLEM; that a review of the
9 transcript was not requested; and that the transcript
10 is a true and complete record of my stenographic notes.

11
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 action.

17
18 Dated this 15th day of March, 2014.

19
20 
21 Aaron T. Perkins, RPK