

October 8, 2012

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

TERRY GENE BOLLEA	)	
professionally known as HULK	)	
HOGAN,	)	
	)	
Plaintiff,	)	CASE NO.
	)	12012447-CI-011
vs.	)	
	)	
HEATHER CLEM; GAWKER MEDIA,	)	
LLC aka GAWKER MEDIA; et	)	
al.,	)	
	)	
Defendants.	)	

The Videotaped Deposition of:  
JULES WORTMAN  
April 7, 2015

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1 being promoted --

2 A. Correct.

3 Q. -- for the conversation they were having?

4 A. Correct.

5 Q. And then, you mentioned these handwritten  
6 notes on the folder, those notes related to the sex tape  
7 issue?

8 A. Yes.

9 Q. And what did you write on those notes?

10 A. What I said for him when it would come up, I  
11 said, you cannot, you know, he wanted to make sure that no  
12 one would ask him and Dixie. And I'm like I can't, as a  
13 professional in doing this, I can't, I can't do that. This  
14 is live television. This is news. This is whatever. I  
15 said, but you, you can answer it this way. You don't have to  
16 answer any other thing than you feel comfortable. So I  
17 discussed that with him.

18 What I wrote down was, there is no doubt -- or  
19 I'm paraphrasing because I don't remember exactly what I said  
20 to him -- but it was basically yes, there is no doubt that  
21 this has been a tough week for my family and myself or for  
22 me. You know, whether you want to say it's been an  
23 embarrassing week or whatever to address, and then say, but  
24 I'm here to talk about this. We're here to talk about "Bound  
25 For Glory." And then I said, just hit repeat. If they go

1 around you on a different way like you're doing with me, I  
2 would say, repeat, hit the reset button and say the same  
3 thing. You don't have to talk about it. That's, that was my  
4 suggestion to him.

5 Q. The idea being that if it got brought up to  
6 kind of pivot onto the TNA stuff?

7 A. Yeah.

8 Q. Do you know what happened to that folder?

9 A. I have no idea. I'm sure he left it in the  
10 hotel room. I don't know.

11 Q. What was his reaction to those suggestions?

12 A. He called me in the hotel room, he got there  
13 that night and I had gotten there earlier in the day on that  
14 Sunday because we started the tour and he just wanted to make  
15 sure that I had dealt with it with the producers. And I  
16 said, I'm not dealing with the producers. This is how. Then  
17 he said, but my other publicist would have had it negotiated.  
18 I'm like well, I'm not her. I said, this is what you need to  
19 do. That was it. That was all.

20 Q. Did you then spend time with him, I guess from  
21 what you said --

22 A. Not that night.

23 Q. -- you didn't see him that night?

24 A. (Witness shakes head in the negative.) It  
25 was late, like 10:30, 11:00, maybe even later, I don't know.