

EXHIBIT C

In The Matter Of:

TERRY GENE BOLLEA

v.

HEATHER CLEM

BLATT, KEVIN D. - Vol. 1

March 25, 2015

MERRILL CORPORATION

Legalink, Inc.

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

TERRY GENE BOLLEA professionally)
known as HULK HOGAN,)
)
Plaintiff,)
) Case No.
vs.) 12012447-CI-011
) Pages 1 to 230
HEATHER CLEM; GAWKER MEDIA,)
LLC aka GAWKER MEDIA, et al.,)
)
Defendants.)
)

DEPOSITION OF KEVIN D. BLATT
TAKEN ON
WEDNESDAY, MARCH 25, 2015

Reported by: PHILIP D. NORRIS
CSR NO. 4980

1 Deposition of Kevin D. Blatt, taken on
2 behalf of Plaintiff, at 1925 Century Park East, Los
3 Angeles, California, on Wednesday, March 25, 2015,
4 at 9:46 a.m., before Philip D. Norris, CSR No. 4980,
5 pursuant to Notice.

6

7 APPEARANCES:

8

9 FOR THE PLAINTIFF:

10 BAJO CUVA COHEN TURKEL

11 BY: SHANE B. VOGT, ESQ.

12 100 North Tampa Street

13 Suite 1900

14 Tampa, Florida 33602

15 (813) 868-6650

16 - and -

17 HARDER MIRELL & ABRAMS, LLP

18 BY: CHARLES HARDER, ESQ.

19 1925 Century Park East

20 Suite 800

21 Los Angeles, California 90067

22 (818) 594-0800

23

24

25

1 APPEARANCES:

2

3 FOR THE DEFENDANTS:

4 LEVINE SULLIVAN KOCH & SCHULTZ, LLP

5 BY: PAUL J. SAFIER, ESQ.

6 MICHAEL BERRY, ESQ.

7 1760 Market Street

8 Suite 1001

9 Philadelphia, Pennsylvania 19103

10 (215) 988-9146

11

12 ALSO PRESENT:

13 JEMAL JUDKINS (Videographer)

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1 give you a precise date. 12:50:30

2 MR. VOGT: Is that right? It doesn't have 12:50:31
3 a date on it. 12:50:39

4 MR. HARDER: I believe it came in right 12:50:40
5 around October 2012. That's my understanding. 12:50:42

6 THE WITNESS: It would have been after I -- 12:50:44
7 the actual publication of the video happened. 12:50:45

8 MR. VOGT: Okay. Okay. 12:50:48

9 Q. At the time were you working for sex.com? 12:50:49

10 A. They're a client of mine, yes. 12:50:55

11 Q. When you say "a client," what do you mean? 12:50:57

12 A. I publicize their website via mainstream 12:50:59
13 press. This was the first thing I did with them. 12:51:05

14 Q. What does that mean, you publicized their 12:51:11
15 website via mainstream press? 12:51:14

16 A. A pseudo offer letter. In other words, 12:51:17
17 this was just the way -- the loss leader of getting 12:51:19
18 sex.com's name out in the press and attaching it to 12:51:21
19 a mainstream news story. 12:51:25

20 Q. When you say "a pseudo offer letter," is 12:51:27
21 that -- by "pseudo" you mean false? Is that what 12:51:32
22 you mean? 12:51:35

23 A. What I mean by it is that we fully know 12:51:36
24 that the celebrity in question's not going to be 12:51:39
25 answering my offer. Isn't going to even give -- pay 12:51:41

1 any attention to it whatsoever. This is just simply 12:51:46

2 a way of piggybacking on some press and the search 12:51:49

3 engine optimization involved with that celebrity. 12:51:55

4 Q. Why do you send pseudo offer letters? 12:51:57

5 A. To get the name out. Just like Vivid, I 12:52:01

6 get paid a fee for publicity in getting mainstream 12:52:03

7 press out on different adult websites. 12:52:09

8 Q. Were you paid to write this letter? 12:52:11

9 A. Yes, I was. 12:52:20

10 Q. How much were you paid? 12:52:20

11 MR. SAFIER: Objection to form. 12:52:21

12 THE WITNESS: \$3,000. 12:52:22

13 BY MR. VOGT: 12:52:23

14 Q. Who paid you? 12:52:24

15 A. Sex.com. 12:52:25

16 Q. Why didn't sex.com just write the letter 12:52:31

17 themselves? 12:52:36

18 MR. SAFIER: Objection to form. 12:52:36

19 THE WITNESS: Because they're not in the 12:52:36

20 business of writing publicity letters, they're in 12:52:38

21 the business of putting out websites and pin boards. 12:52:40

22 BY MR. VOGT: 12:52:45

23 Q. Who's Martin Ellison? 12:52:47

24 A. Martin Ellison, I believe, is one of the 12:52:48

25 principals of the company that they told me to sign 12:52:51

1

2 I, Philip D. Norris, a Certified Shorthand
3 Reporter for the State of California, do hereby
4 certify:

5 That prior to being examined, Kevin D.
6 Blatt, the witness named in the foregoing
7 deposition, was by me duly sworn to testify the
8 truth;

9 That said deposition is a true record of
10 the testimony given and was taken before me at the
11 time and place therein set forth, and was taken down
12 by me in shorthand and thereafter reduced to
13 typewriting via computer-aided transcription under
14 my direction;

15 I further certify that I am neither counsel
16 for, nor related to, any party to said action, nor
17 in anywise interested in the outcome thereof.

18 In witness whereof, I have hereunto
19 subscribed my name this 27th day of March ,
20 2015.

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Philip D. Norris
CSR NO. 4980