

# **EXHIBIT D**

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

	I N D E X	Page
EXAMINATION BY MR. BERRY		4
EXAMINATION BY MR. VOGT		91
REEXAMINATION BY MR. BERRY		98

	E X H I B I T S	Page
No.		
210, Foreign Court Subpoena		11
211, E-mail from Bob Ryder to Jules Wortman of September 7, 2012, Bates label TNA-G0011		27
212, E-mail from Jules Wortman to Terry Bollea of October 5, 2012 with itinerary, Bates label TNA-G0018-23		30
213, E-mail from Chris Thomas to Jules Wortman of March 7, 2012, Bates label TNA-G0001		42

ANNE S. WILSON & ASSOCIATES  
P.O. Box 150651  
Nashville, TN 37215  
(615) 298-1992

1	E X H I B I T S	Page
2	No. 214, E-mail from Jules Wortman to Dixie Carter of March 8, 2012, Bates label TNA-G0005	43
3	215, E-mail from Dixie Carter to Hogan of March 8, 2012, Bates label TNA-G0006	52
4	216, E-mail from Chris Thomas to Jules Wortman of April 26, 2012, Bates label TNA-G0008	55
5	217, Article of dailytelegraph.com.au, Bates label GAWKER 24295-96	55
6	218, E-mail from Chris Thomas to Dixie Carter, Andy Barton, Dean Broadhead and Jules Wortman of October 4, 2012, Bates label TNA-G0014	58
7	219, E-mail from Jules Wortman to Dixie Carter of October 4, 2012, Bates label TNA-G0016	60
8	220, E-mail from Dixie Carter to Jules Wortman of October 4, 2012, Bates label TNA-G0017	62
9	221, String of e-mails of October 10 and 11, 2012, Bates label TNA-G0042-43	70
10	222, Disk of video clip of Sway in the Morning of 10/10/12	81
11		
12		
13		
14		
15	The videotaped deposition of Jules Wortman was	
16	taken pursuant to agreement at the law offices of	
17	Bradley Arant Boult & Cummings, LLP, Roundabout Plaza, 160	
18	Division Street, Suite 700, Nashville, Tennessee, beginning	
19	at 10:16 A.M., at the instance of counsel for the Defendant,	
20	pursuant to the provisions of the Florida Rules of Civil	
21	Procedure.	
22	All formalities as to notice, caption, except	
23	reading and signing of the deposition by the witness are	
24	waived. All objections except as to form of the question are	
25	reserved for the hearing.	

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

A P P E A R A N C E S:

For the Plaintiff:           Shane B. Vogt  
                                  Attorney at Law  
                                  BAJO CUVA COHEN & TURKEL, P.A.  
                                  100 N. Tampa St. Suite 1900  
                                  Tampa, FL 33602

For the Defendant:         Michael Berry  
                                  Paul J. Safier  
                                  Attorneys at Law  
                                  LEVINE SULLIVAN KOCH & SCHULZ, LLP  
                                  1760 Market Street  
                                  Suite 1001  
                                  Philadelphia, PA 19103

Video Technician:         Allan McCall

1 VIDEO TECHNICIAN: Today is April 7, 2015.  
2 The time is 10:16 A.M. Our location is 160 Division Street,  
3 Suite 800 in Nashville, Tennessee. In the Circuit Court of  
4 the Sixth Judicial Court In And For Pinellas County, Florida.  
5 Case No. 12012447-CI-011. The deponent is Jules Wortman.  
6 Would the attorneys, please, make voice introductions?

7 MR. BERRY: This is Mike Berry from Levine  
8 Sullivan Koch & Schulz in Philadelphia representing  
9 Gawker Media, LLC, Nick Denton and A.J. Daulerio.

10 MR. SAFIER: Paul Safier from Levine Sullivan  
11 Koch & Schulz representing Gawker Media, LLC, Nick Denton,  
12 A.J. Daulerio.

13 MR. VOGT: Shane Vogt on behalf of  
14 Terry Bollea.

15 VIDEO TECHNICIAN: The court reporter is  
16 Anne Wilson. Would you, please, swear the witness?

17  
18 JULES WORTMAN,

19  
20 after having been first duly sworn, testified as follows:

21  
22 EXAMINATION BY MR. BERRY:

23  
24 Q. So before we get going, Jules, just kind of  
25 talk to you a little bit about the deposition. Have you ever

1       been deposed before?

2             A.           Only during a divorce, my own divorce.

3             Q.           Have you ever testified in court before?

4             A.           Just in my divorce.

5             Q.           Okay. Well, I'll just to be kind of explain  
6       it, just how things will go here.

7             A.           Uh-huh. [Affirmative.]

8             Q.           Basically, I'll be asking you a series of  
9       questions today and you'll be giving answers. Shane will  
10       then have an opportunity if he likes to ask you some  
11       questions, as well.

12                        While you're answering our questions, Anne  
13       will be taking this down on the transcript typing up  
14       everything that all of us say during the course of the  
15       deposition. It's also being video recorded here so we'll  
16       also have a video record.

17                        Because everything is being taken down, you  
18       know, in typing, you know, stenographly (phonetic),  
19       stenographically, it's a little awkward, it's important to  
20       answer questions orally. So saying yes and no instead of  
21       uh-huh, huh-uh [negative], you know, nodding your head  
22       doesn't work. It's okay for the video, but for the written  
23       transcript, it's not so good.

24                        The second thing is, to make life a little  
25       easier for Anne, it's helpful if you and I try not to

1 interrupt each other or cut each other off. A lot of times,  
2 you know, you might anticipate what I'm going to ask or kind  
3 of know where I'm going and, you know, it's natural in  
4 conversation just to jump right in. I sometimes will do the  
5 same thing, understand what you're saying, I may jump in with  
6 a question. But to the extent we can, let's try and go back  
7 and forth.

8 A. Can I have that little pad and pencil just in  
9 case I need them?

10 Q. Oh, sure.

11 A. Say something if I want to write something  
12 down.

13 MR. SAFIER: Can I just get you some paper?

14 THE WITNESS: Sure.

15 MR. SAFIER: Do you have a pen?

16 THE WITNESS: I do in my bag, but if you have  
17 an extra one over there. I just --

18 (Pen and paper handed to witness.)

19 THE WITNESS: Thanks.

20 Q. (By Mr. Berry) I guess this is actually a  
21 good thing to tell you at this point. During the course of  
22 the deposition, we won't be here long, but if there is times,  
23 like a lot of times when you talk to folks, you know, we  
24 might be talking about one thing, and then a little bit  
25 later, talking about something else. Kind of remember like

1 oh, when we were talking about the first thing, I said this,  
2 what I actually meant to say was that or, you know, I forgot  
3 that it was actually this, too. If that ever happens to you  
4 during the day today, feel free and just say Mike, you know,  
5 you were talking about that before, I just remembered  
6 whatever, can we talk about it. Definitely can. And we'll  
7 kind of go back and forth if you remember things as we go or,  
8 you know, want to clarify things as we go.

9           During the course of the deposition, I try to  
10 ask good questions and I talk, try to talk clearly, but as  
11 you have seen already with my stenographic, I don't always  
12 speak so well and mumble. I get things jumbled. I sometimes  
13 talk fast. I occasionally talk quietly and, you know, I  
14 guess questions kind of come out sometimes a little bit  
15 jumbled.

16           If you don't understand anything for any  
17 reason during the deposition, feel free to stop me and say  
18 Mike, can you say that more clearly, could you slow it down,  
19 whatever it is and I'd be happy to make sure you understand.

20           The other thing is, again, we're not going to  
21 be here so long. But if at any point you want to take a  
22 break, step out, go to the restroom or grab some more coffee,  
23 some water, just let us know.

24           A.           Okay.

25           Q.           This isn't, you know, we're not, you're not in



1 the hot seat here.

2 A. Right.

3 Q. Just answer questions. You feel free to step  
4 out whenever you like. Are you taking any medications that  
5 would affect your ability to remember stuff or testify  
6 truthfully?

7 A. No, sir.

8 Q. Is there any reason that you couldn't testify  
9 truthfully today?

10 A. No, sir.

11 Q. Okay. The other thing, well two other things  
12 I guess I should mention, one is, and I think you probably  
13 know this already, in the case, there is I guess what in  
14 legalese we call a Protective Order which basically the  
15 parties have agreed and the judge has ordered that either of  
16 us, either of the parties or any witness can mark stuff as  
17 confidential. So if they don't want it used for anything  
18 other than purposes of the litigation, you'll have an  
19 opportunity, again when you look at the transcript, to mark  
20 stuff as confidential.

21 A. Okay.

22 Q. I think there was a copy of that attached to  
23 the document Subpoena you got way back. If you would like  
24 another copy, we can get you one. But you will have an  
25 opportunity when you look at the transcript to mark anything

1 as confidential over as we're going through the deposition  
2 today, if something comes up that you want to keep  
3 confidential just let us know and we can mark that part of  
4 the transcript as confidential. Does that make sense?

5 A. Uh-huh. [Affirmative.] What about the video?

6 Q. Same thing. It's basically the substance of  
7 what you would say, it's kept confidential during the  
8 discovery period in the case. And again, we can send you  
9 another copy of the Protective Order so you can see it.

10 MR. VOGT: It could be played at trial.

11 Q. (By Mr. Berry) Right. It might ultimately --

12 A. Correct.

13 Q. -- be played at trial.

14 A. That's why, yeah.

15 Q. But again, depending on, yes, and we can  
16 explain all this to you if you have questions. But there  
17 will be a process if it's going to be, if there is a trial  
18 and if it's played at trial and something has been marked  
19 confidential, there is a process that will be gone through  
20 before that can happen.

21 But the other thing with the confidentiality  
22 is just like you'll have 30 days to review and sign the  
23 transcript for those 30 days everything, the video, the  
24 transcript will be considered confidential to give you an  
25 opportunity to review it for confidentiality and for us to do

1 the same.

2 A. Okay.

3 Q. The other thing that I wanted to mention is,  
4 during the course of the deposition, I'll be showing you some  
5 papers, some e-mails and various things; Shane may, as well.  
6 And the way that that works is each thing is marked with an  
7 Exhibit number. And it's a little weird in this case. We've  
8 been going at this for some time and talked to a number of  
9 different folks like this, and so you're coming into the  
10 middle of a movie. The exhibits are numbered. We started  
11 way back when. We're now up to I think Exhibit 210. So,  
12 we're going to be sort of starting in the middle. If you  
13 have any question about why that's where we're started, but  
14 for us, it helps keeps things square --

15 A. Okay.

16 Q. -- throughout. Do you have any other  
17 questions just about the process of the deposition before we  
18 get going?

19 A. Do you, is it basically you, since you depose  
20 me, you ask me the questions first and then he counter asks  
21 or asks after that?

22 Q. Right. So I'll be able to ask all of my  
23 questions and then Shane will have an opportunity after I'm  
24 all done to ask questions, and then, if he asks questions, I  
25 may have some follow-up questions --

1 A. Absolutely.

2 Q. -- based on that.

3 MR. VOGT: Both of us when either one is  
4 asking questions, we'll occasionally object. Typically,  
5 we'll just say objection to form, you can still answer the  
6 question. It's something we're doing to preserve the record  
7 so we can argue to the judge later --

8 A. Later.

9 Q. -- that we think it was an improper question.

10 A. Okay.

11 Q. (By Mr. Berry) And that's what Anne was  
12 talking about before when she said all objections are  
13 reserved. Again, like we might go back and forth --

14 A. Okay.

15 Q. -- saying objection to form. You answer. But  
16 the purpose is that the judge, like Shane said, can weigh in  
17 later.

18 A. Okay.

19 Q. So just one last sort of housekeeping  
20 matter, I'll just go ahead and I'll mark this actually as  
21 Exhibit 210.

22 (Foreign Court Subpoena was marked as Ex.  
23 No. 210 and attached to the original of this  
deposition.)

24 (Document handed to witness.)

25 Q. So you're here today because we served you

1 with a Subpoena, right?

2 A. Yes, sir.

3 Q. Is this a copy of the Subpoena that you had  
4 received?

5 A. Yes, sir.

6 Q. Okay. Also, just as we go through, this  
7 probably won't be a huge issue, but as I, when I show you  
8 documents, if you want to take time to read through them,  
9 feel free to take as much time as you want. You know, it's  
10 not a memory test or speed writing.

11 A. Correct.

12 Q. Just take as much time. There won't be a  
13 whole lot of stuff, but as we go through --

14 A. Uh-huh. [Affirmative.]

15 Q. -- make sure that you take your time to read  
16 stuff.

17 A. Yes.

18 Q. Ms. Wortman, where do you live?

19 A. I live in Hendersonville, Tennessee.

20 Q. Is that near Nashville?

21 A. Yes. It's about 20 miles north of Nashville.

22 Q. And I understand that you work in public  
23 relations, right?

24 A. I do work in public relations and marketing,  
25 yeah.

1 Q. How long have you worked in public relations  
2 and marketing?

3 A. Twenty, this will be my 25th year.

4 Q. All here in the Nashville area?

5 A. Yes, sir.

6 Q. I understand that you have your own firm now?

7 A. I do have my own firm.

8 Q. What is that called?

9 A. Wortman Works Media and Marketing.

10 Q. When did you start that?

11 A. 1998.

12 Q. Prior to starting your firm in 1998, what  
13 other kinds of public relations jobs had you had?

14 A. I've worked at independent PR firms and I've  
15 mostly been a senior executive at international record labels  
16 from Atlantic Records, MCA Universal, Warner Brothers.

17 Q. Like as somebody in public relations, what  
18 exactly do you do?

19 A. That's a hard question to answer because  
20 everyday is a different day. Mostly, I build strategic plans  
21 to promote a project, an individual, an event. That's  
22 basically it. But it just depends on what it is. But you  
23 develop something to make it either popular or not popular.

24 Q. Like what is your ultimate objective then,  
25 you're --

1 A. My ultimate objective is to do a good job.

2 Q. Cast your clients in a good light?

3 A. Yes, sir.

4 Q. And how do you ultimately, when you're working  
5 with an individual, how do you do that?

6 A. Well, you usually establish a really good  
7 relationship with an individual and you get to know them  
8 really well so you understand who they are and you take, you  
9 extract from who they are and build their image.

10 Q. And how do you build their image, through?

11 A. Well, they're all different. Everyone is  
12 different, so that's hard to, it's really hard to explain how  
13 to do that.

14 Q. But I guess mechanically, do you help them  
15 secure media appearances, do you issue press releases,  
16 that's --

17 A. Yes, press releases, media, media training.  
18 There's a lot of things you do, but those are probably the  
19 top, top line things that you do. It's cyclical. Sometimes  
20 an individual is not doing anything so you're not doing  
21 anything with them, but if they're doing something, you're  
22 promoting it.

23 Q. Right. Are there ever times that, that folks  
24 that you work with don't want media coverage?

25 A. Say that again.

1 Q. Are there times that folks that you work with  
2 don't want something covered by the media?

3 A. Oh sometimes, yeah, of course. If it's a  
4 private, you know, if they're doing something, a lot of  
5 times, people don't want to promote that they're giving a  
6 million dollars to Children's Hospital so you don't do it.  
7 You don't. You just let it go.

8 Q. If you didn't mind me asking, over the years,  
9 who are some of the people that you have done PR work for?

10 A. Over the years, I've done George Strait,  
11 Reba McEntire, Tim McGraw, Faith Hill, Kid Rock, Vince Gill,  
12 Christian Music Awards, Country Music Awards, Big and Rich,  
13 Blake Shelton, Al Gore, Joe Lieberman, a lot of people.

14 Q. I understand that you also teach some?

15 A. I teach at Belmont as an adjunct professor,  
16 this is my first semester teaching.

17 Q. What do you teach?

18 A. Career development in the entertainment  
19 business.

20 Q. Is that college kids?

21 A. Yes. They are mostly sophomores and juniors.

22 Q. Have you ever worked for a company called TNA?

23 A. Yes.

24 Q. What is TNA?

25 A. It's a professional wrestling company.



1 Q. So as I understand it, TNA puts on wrestling  
2 shows throughout the country?

3 A. Yes.

4 Q. And it also produces a television show?

5 A. Yes, it does.

6 Q. When you were working there, television show  
7 was broadcast nationally, right?

8 A. Yes. Internationally, actually.

9 Q. What was it broadcast on?

10 A. Spike TV when I was there.

11 Q. When did you start working for TNA?

12 A. Well, I've known Dixie for a long time and I  
13 went to work for her September of whatever year, oh, I was  
14 really going to be, initially I was going to just work as a  
15 consultant, and then, I ended up becoming a vice-president  
16 there in PR. I think it was September 2011.

17 Q. And how long did you work there?

18 A. Not long, 18 months.

19 Q. Okay.

20 A. I left March of 2013, I think it was.

21 Q. You had mentioned Dixie.

22 A. Excuse me.

23 Q. You had mentioned Dixie. Who is that?

24 A. This lady that, her family owns the company,  
25 Dixie Carter.

1 Q. And so how did you begin working at TNA?

2 A. We discussed them needing a more national  
3 exposure, somebody that knows how to build a national  
4 campaign. And so, I just started talking to them 'cause I  
5 was wanting to do other things besides music. So I thought  
6 this would be fun.

7 Q. So, you had known Dixie before?

8 A. Yes.

9 Q. And what was her role with TNA?

10 A. Well, her role was, I think she was the  
11 president, but her family owned the business.

12 Q. And she was the one running?

13 A. She ran it, yes.

14 Q. Did she also have any like on-screen role in  
15 the TNA?

16 A. Yes. She became a character playing herself,  
17 basically.

18 Q. And so y'all had been friends prior to your  
19 going to work at TNA?

20 A. I wouldn't say close friends, but we were, we  
21 did a lot of work together prior to her going to the present  
22 company.

23 Q. What kind of work had y'all done?

24 A. She did PR, she had some music clients.

25 Q. And so that's how y'all had known each other?

1           A.           Uh-huh. [Affirmative.] And we were in  
2 Leadership Music together and things like that.

3           Q.           What's Leadership Music?

4           A.           It's a leadership program that you're selected  
5 to be in. It's like an eight-month, nine-month, almost like  
6 a Ph.D. program of learning about the different aspects of  
7 the industry, about 25 people in the class a year.

8           Q.           You had mentioned when you were at TNA you  
9 were a vice-president, what was your actual title?

10          A.           It was vice-president of public relations.

11          Q.           Okay. Don't mean to put you on the spot.

12          A.           No, I think, I blocked it, anyway.

13          Q.           And what were your responsibilities then at  
14 TNA?

15          A.           To run the PR strategy and set up media tours,  
16 tour press for the live events that were on the road, and set  
17 up opportunities for building the image of the company.

18          Q.           And did you -- Was Dixie Carter your boss  
19 then?

20          A.           Yes, sir.

21          Q.           Was she involved in the PR and marketing, as  
22 well?

23          A.           Yes, sir.

24          Q.           Were there -- Well, describe her role in the  
25 PR and marketing.

1           A.           She just wanted to make sure that she had her  
2 hand on every part of it because that was her background.

3           Q.           Were there other people working on PR when you  
4 were there?

5           A.           Yes. I had two and-a-half employees.

6           Q.           Who worked under you?

7           A.           (Witness nods head in the affirmative.)

8           Q.           Who were they?

9           A.           Chris Thomas who lives in L.A. now and a girl  
10 that I brought in, there was a girl that worked there prior  
11 when I first started but she didn't stay long, and then, I  
12 brought a girl that used to work for me in, Lindsey.

13          Q.           What's Lindsey?

14          A.           Lindsey, her last name is Pease now,  
15 P-e-a-s-e. But she no longer works there either, she left  
16 the company, too.

17          Q.           And who, and then there was somebody else.

18          A.           Chris left. Everyone left that was working  
19 with me left that company.

20          Q.           Did they leave after you left?

21          A.           Chris left right before me, Lindsey left a  
22 couple of months after me.

23          Q.           And then, you had mentioned there was two  
24 and-a-half?

25          A.           Well, there was a part-time kind of that they

1 would be, they were like contract temporary employees, so  
2 they shared half time with me and another department.

3 Q. Okay.

4 A. And those were floaters, so I wouldn't say  
5 they were with me everyday. I don't even remember their  
6 names.

7 Q. What was the role of the PR department at TNA  
8 while you were there?

9 A. I previously answered that, but it was to set  
10 up media tours, create strategies to expose the brand and do  
11 live tour event press. That was mainly it.

12 Q. Did you use some of the wrestlers to promote  
13 the company?

14 A. Yes, sir.

15 Q. And I guess also in doing that, you promoted  
16 some of the individual wrestlers themselves as characters on  
17 the show?

18 A. As part of the show, yeah. I mean, they were,  
19 they were the show.

20 Q. Right. When you were at TNA, Hulk Hogan was  
21 affiliated with TNA, as well, right?

22 A. Yes, sir.

23 Q. What was his role?

24 A. Well, he was a character on the show, but he  
25 had a lot of say in the development of story lines, whatever.

1 I mean, he had more of a role than the other wrestlers did.  
2 He was more of a office guy, as well. He didn't work in the  
3 office, but he helped create the story lines and whatever  
4 with the writers.

5 Q. Did he wrestle on the show?

6 A. I don't know. I wouldn't call what he did  
7 wrestling. He was more of a figure head, 'cause I don't  
8 think he was, you know, they would tease him up into  
9 wrestling, but he didn't really wrestle when I was there.

10 Q. And so, I've seen some stuff where he was  
11 referred to as the general manager of TNA?

12 A. I guess that was his role is like the general  
13 manager of the company on TV.

14 Q. Right. So on TV, I guess one of the story  
15 lines was that he was second in command to Dixie, right?

16 A. Right.

17 Q. Is that in reality how it was?

18 A. No, sir, not in the office.

19 Q. Right.

20 A. I don't know.

21 MR. VOGT: Anybody tell you wrestling is fake?

22 A. It is, it can get confusing. It becomes  
23 reality to a lot of them.

24 Q. (By Mr. Berry) You say when he was playing as  
25 general manager, that was a character role?

1           A.           Correct.

2           Q.           Was Hulk Hogan important to TNA when you  
3 worked there?

4           A.           A lot of us, a lot of the talent were  
5 important, but obviously, he was one of the higher profile  
6 and so I consider that important in the PR world.

7           Q.           And why was that important?

8           A.           Because people knew who he was and he was  
9 easy, he was, he helped expose the company. People wanted to  
10 talk to Hulk Hogan. They didn't care about the other talent.

11          Q.           Right. So I take it from what you're saying  
12 is when you were working on PR with the company, did you have  
13 an opportunity to work on PR with Hulk Hogan?

14          A.           Yes, sir.

15          Q.           We'll talk in a little bit about the media  
16 tour in New York in 2012. Other than that, did you have  
17 opportunities to work with him?

18          A.           Yes, sir.

19          Q.           What kind of work?

20          A.           Being on the set in Orlando mostly or being on  
21 the road on some of the dates, but he didn't do a lot of the  
22 live shows. But mostly when we were doing TV tapings, you  
23 know, he would do media, phoners. I would work with him on  
24 set. Just you never know what, everybody would just pick up  
25 and do things. Like if I needed to go get him something or

1 take his shirt to him, you know, whatever. I mean, so I had  
2 those kind of opportunities, but that was about it.

3 Q. Did you work with him in planning media events  
4 like his appearances and stuff like that?

5 A. Yes, sir.

6 Q. Tell me a little bit about that interaction,  
7 like how y'all would work together.

8 A. Dixie would like to go to him and say we would  
9 like for you to do media, can we have some dates to do media.  
10 And then once, you know, that was agreed upon, and usually,  
11 we would just do a media tour around our big event of the  
12 year which was the "Bound For Glory," which was kind of like  
13 the wrestle mania for TNA.

14 So once I would get the go ahead and mark the  
15 dates, then I would deal with him on setting up the media and  
16 approving which ones he would do with him and I would just  
17 set up the, set up the tour and then send him the  
18 information.

19 Q. Would you say that he was somebody who is  
20 experienced in dealing with the media?

21 A. Yes, sir.

22 Q. During the time that you had worked with him,  
23 were there particular media outlets that he had good  
24 relationships with?

25 A. That he had good relationships with?



1 Q. Yes.

2 A. Yes.

3 Q. Which outlets stand out in your mind?

4 A. Howard Stern, TMZ.

5 Q. Why do you say that he had good relationships  
6 with those folks?

7 A. Because he did.

8 Q. In working with him, was there a particular  
9 type of media that seemed interested in Hulk Hogan?

10 MR. VOGT: Objection to form.

11 A. A lot of media were interested in him,  
12 national, news. He's an iconic figure. I mean, he makes  
13 great television.

14 Q. (By Mr. Berry) In what way?

15 A. He's a great personality and he's very  
16 engaging, so people like to have him on their shows.

17 Q. In working with him, did you have an  
18 understanding about how, whether he had any particular views  
19 on publicity?

20 A. I cannot answer that. I don't have a, I don't  
21 know.

22 Q. So a couple of seconds ago, I had mentioned a  
23 media tour in the fall of 2012 in New York. Do you recall  
24 that?

25 A. Yes, sir.

1 Q. Why was that tour planned?

2 A. For "Bound For Glory," we call it Go Home,  
3 they called it the Go Home Tour, and it's the media leading  
4 up to the big event. And we do it every year. We did one in  
5 2011 and we worked with Hulk and Kurt Angle and Jeff Hardy  
6 and we did it again in 2012. Those were the two years I was  
7 there and that was the main time we did a major national  
8 tour.

9 Q. And who was Kurt Hardy and Jeff Angle?

10 A. Different names.

11 Q. Oh.

12 A. Kurt Angle and Jeff Hardy.

13 Q. Sorry.

14 A. They are two other wrestlers that were pretty  
15 big, that we would use other talent, as well.

16 Q. In 2012, was it just Hulk or were those  
17 fellows involved, as well?

18 A. Not on the national tour. They did some other  
19 things local press and whatever, but Hulk did the national  
20 tour.

21 Q. What was your --

22 A. I call it a national tour 'cause it was in  
23 New York and that's the media center.

24 Q. And the media that he was on was all national  
25 media?

1           A.           Yes.

2           Q.           And what was your role with that media tour on  
3           October 2012?

4           A.           Well, I set up the whole media tour which I  
5           started back in probably August of that year, started setting  
6           it up for the first of October.

7           Q.           When you say setting it up, like specifically  
8           what kind of things did you do?

9           A.           Usually, you cannot book TV day of or week of,  
10          you have to set it up. You have to go pitch it, create  
11          interest, and try to lock down the dates that you have  
12          available. I had a two-day window to do press, so I had to  
13          negotiate and work with the TV bookers or the print or  
14          whomever helping Huffington Post. Whatever we were doing,  
15          you have to set it up well in advance, so that's what I mean  
16          by set up.

17          Q.           Do you recall when Hulk Hogan's involvement in  
18          the tour was confirmed?

19          A.           Probably, I couldn't tell you the exact day,  
20          but probably around the end of August because I didn't start  
21          setting things up until I had a confirmation that I had those  
22          dates for him to do it and that was probably a month  
23          and-a-half out from the tour.

24          Q.           Okay. As I mentioned, during the deposition,  
25          I'm going to show you a couple of documents.

1           A.           Uh-huh. [Affirmative.]

2           Q.           I'd like to go ahead and show you one now.

3           And we'll mark this as Exhibit 211.

4                       (E-mail from Bob Ryder to Jules Wortman of  
5                       September 7, 2012, Bates label TNA-G0011 was  
6                       marked as Ex. No. 211 and attached to the  
7                       original of this deposition.)

8           Q.           Just for background here, I'll give this to  
9           you.

10                       (Document handed to witness.)

11           A.           I might have to grab my glasses.

12           Q.           Yeah. Feel free.

13           A.           Can you grab my bag 'cause I'll --

14           Q.           Here you are.

15                       (Purse handed to witness.)

16           A.           If I can see it. I hope I have my glasses in  
17           here.

18           Q.           So just for background purposes, I'll be  
19           showing you some documents. Some of these documents were  
20           documents that were produced by TNA.

21           A.           Uh-huh. [Affirmative.] So I was pretty  
22           close, probably the end of August and that was Labor Day  
23           weekend, so that was probably what that means right there.  
24           Bob was our obviously director of talent and book, he did all  
25           of our travel.

          Q.           So, that's Bob Ryder?

1           A.           Bob Ryder. So that e-mail to me September 7th  
2 was a Friday, so he probably just talked to him about booking  
3 the tour. I had already confirmed it probably at the end of  
4 August. You know what I'm saying? So I was close.

5           Q.           Right.

6           A.           I don't know exact dates, but . . .

7           Q.           These refreshes your recollection then about  
8 roughly the time?

9           A.           Uh-huh. [Affirmative.]

10          Q.           Do you recall receiving this e-mail?

11          A.           No.

12          Q.           Okay. But --

13                   MR. VOGT: Really?

14          A.           Come on.

15          Q.           (By Mr. Berry) But in it, Bob is confirming  
16 to you that he's talked --

17          A.           Book his travel. Uh-huh. [Affirmative.]  
18 That's what that means, he was going to book his travel.

19          Q.           And these are the specific dates that  
20 Hulk Hogan is available for the media tour, right?

21          A.           Correct.

22          Q.           And the --

23          A.           'Cause we were doing two days. Uh-huh.  
24 [Affirmative.]

25          Q.           And the days that he said that Hulk would be

1 available were October 9th and 10th?

2 A. Correct.

3 Q. So by this point, your understanding was that  
4 Hulk was locked in to coming to New York those days?

5 A. Uh-huh. [Affirmative.]

6 Q. And he was aware of the tour, right?

7 A. Correct.

8 Q. And then, based on what you had said earlier,  
9 after Hulk's involvement was confirmed, you then would go  
10 ahead and be able to set up the --

11 A. Correct.

12 Q. -- specific media appearances?

13 A. Correct.

14 Q. How did you go about selecting, pitching,  
15 deciding what media to pitch Hulk to?

16 A. Well, some I have really good relationships so  
17 I know I can get it booked; some of the other is trying to  
18 make sure that all the markets were covered to try to get  
19 tune in for our TV show, pay-per-view whenever that was. So  
20 you try, you try to diversify the reach to hopefully get  
21 people to tune into the show. That's how I do it --

22 Q. And so --

23 A. -- or would do it.

24 Q. And in this case in particular, when you were  
25 going up to New York, you were kind of applying that analysis

1       then to the media that you were pitching them to?

2               A.           That's how I do every show, every, every tour  
3 I do with anybody.

4               Q.           Was Dixie Carter involved in that process?

5               A.           No, sir.

6               Q.           Was Hulk Hogan involved?

7               A.           No. I would just run by him who we were going  
8 to be doing.

9               Q.           And were --

10              A.           And then, I would send him the final itinerary  
11 once I had everything locked in with all the information.

12              Q.           Were there any media, prior to the tour, were  
13 there any media that he said he didn't want to do or that he  
14 did want to do?

15              A.           Not really that I recall.

16              Q.           Okay. I'm going to show you another document  
17 here that we'll mark as Exhibit 212.

18                           (E-mail from Jules Wortman to Terry Bollea  
19 of October 5, 2012 with itinerary, Bates label  
20 TNA-G0018-23 was marked as Ex. No. 212 and  
attached to the original of this deposition.)

21                           (Document handed to witness.)

22              Q.           Take as much time as you want to to look  
23 through this.

24              A.           Uh-huh. [Affirmative.]

25              Q.           I'm going to ask you a few questions about it.

1           A.           Okay.

2           Q.           So, do you recognize this document?

3           A.           Yes, sir.

4           Q.           What is this?

5           A.           This is what usually I would send to any  
6 client when we head out to go on tour. Like go on a tour,  
7 I'd send them the itinerary, what we were doing with all of  
8 the information.

9           Q.           So, this is an e-mail in this case you sent to  
10 Terry Bollea?

11          A.           Terry Bollea, Chris Thomas that used to work  
12 for me that I mentioned earlier, Bob is travel and Mr. Atlas  
13 was the security.

14          Q.           Okay. And Terry Bollea, just for clarity's  
15 sake, is the real name of Hulk Hogan?

16          A.           Yes, sir.

17          Q.           Was it typical for you to send stuff to him,  
18 to Terry Bollea by e-mail?

19          A.           Yes, sir.

20          Q.           Do you know whether he received your e-mails?

21          A.           Yes, sir.

22          Q.           How do you know that?

23          A.           He would usually respond, got it, thanks, HH.

24          Q.           And then, this e-mail has an attachment to it?

25          A.           Yes, sir.



1 Q. What is that attachment?

2 A. This right here where it says Hulk Hogan New  
3 York Media Tour?

4 Q. Exactly.

5 A. That's what it is. It's the media tour.

6 Q. Basically --

7 A. Outlining our two days in New York.

8 Q. The places where he's scheduled to be?

9 A. Where he's scheduled to appear as of whatever  
10 that day, Wednesday, whatever the day was, Wednesday of  
11 October, the week before we left, I sent it to him.

12 Q. Okay. And this shows that he arrives in  
13 October 8th in New York and then has two days of --

14 A. 9th and 10th of media. Uh-huh.

15 [Affirmative.]

16 Q. And I guess as you were saying, this list  
17 shows the various media that he's going to be interviewed by,  
18 right?

19 A. Yes, sir.

20 Q. And so, he was scheduled to be interviewed  
21 first by Howard Stern?

22 A. Yes, sir.

23 Q. And then the Today Show?

24 A. Yes, sir.

25 Q. How did you decide to book him on those two

1 programs?

2 A. Well, Howard Stern is in Bubba the Love Sponge  
3 was part of his show, not at this point, but Howard, we did,  
4 Howard Stern and the Hulk. He was on that show a lot prior  
5 to me whatever, but it's a big wrestling audience that  
6 listens to him and there is a guy on the show that likes  
7 wrestling, he has now since passed, I hear, Eric. And then  
8 the today, and so the timing you know, you always, you know,  
9 from a timing standpoint in the morning, his show is live at  
10 that time, then you just try to plan your schedule to fit  
11 whatever shows you're doing. So that's why we did him first.  
12 And then we went over to the Today Show and did Kathie Lee  
13 and Hoda pretty much right after that.

14 Q. And why did you book him on the Today Show?

15 A. Because it's a good show to be on. That's why  
16 I booked him on there.

17 Q. It has a large national audience?

18 A. Correct.

19 Q. Then on the next page, it says Marvel?

20 A. Marvel comics, they are big supporters of  
21 wrestling and their audience, again that's not something that  
22 you'd normally do in other media, but in wrestling, things  
23 like that, and they have a huge website and they do  
24 interviews on it and so they did Hulk.

25 Q. And then it mentions next to that, New York

1 comic con starts on 10/10, what does that mean?

2 A. There is an event called comic con, that's all  
3 over, they have one, the big one is in San Diego I think  
4 every year. But they are, the New York one was starting that  
5 week, so I was just letting him know that. That was just  
6 like a little note to let him know in case they asked him  
7 anything about comic con 'cause they do a lot, cover a lot of  
8 the characters.

9 Q. And then after that, there is I guess an  
10 interview with something called the Big Lead?

11 A. Big Lead which was, is a sports website that  
12 is run by ESPN, bleacher reports ESPN, whatever, it's one of  
13 those big, it's affiliated with one of those big sites. I  
14 can't remember right now to be honest with you.

15 Q. Right. But that, was that, that was like --

16 A. We had lunch.

17 Q. -- a lunch-screen interview?

18 A. No. It was a handwritten. It was a print  
19 on-line interview and he did the interview during lunch.

20 Q. And then, Huffington Post Live, what was that?

21 A. Uh-huh. [Affirmative.] Huffington Post Live,  
22 Marc Hill is a Columbia professor and he's a talking head on  
23 CNN, Fox, whatever. I happened to see back in the summer  
24 where he was a huge wrestling fan and he was talking about if  
25 wrestling was dead. And so I went to them and said I want to

1 do kind of like an op-ed with Hulk Hogan when we're in  
2 New York with Marc regarding wrestling is alive and well.  
3 That's why I had Jeff Hardy, the younger, hipper guy in on  
4 that through Skype. So it was a live interview with Marc,  
5 Marc Hill.

6 Q. And then, since Jeff Hardy wasn't there, he  
7 did it --

8 A. He did it on Skype so I could get the younger  
9 audience with the, I mean, the younger wrestler with the  
10 older wrestler.

11 Q. And then, on the next page, there's  
12 Hannity/Fox TV, that's Sean Hannity show?

13 A. Yes. It was canceled.

14 Q. When was that canceled?

15 A. About 4 o'clock that afternoon.

16 Q. Who canceled it?

17 A. Hannity.

18 Q. Do you know why it was canceled?

19 A. Yes.

20 Q. Why was that?

21 A. Because they were huge Hulk Hogan fans and he  
22 did not want to discuss the situation that came up, so he  
23 chose to cancel so he wouldn't have to ask him about it.

24 Q. And then after that, it says Piers Morgan/CNN  
25 Live?

1 A. Uh-huh. [Affirmative.]

2 Q. That's the Piers Morgan show that was on in  
3 the evening on CNN?

4 A. Yes, sir.

5 Q. And again, that was booked because, for what  
6 reason?

7 A. To promote the Hulk Hogan, I mean, Hulk Hogan  
8 promoting "Bound For Glory." I mean, all of these were to  
9 promote.

10 Q. Piers Morgan at the time had a large national  
11 audience, as well?

12 A. Yes, he did. The show is now off the air this  
13 year.

14 Q. And then, the following day, Wednesday, it  
15 says Imus/radio/Fox Business channel Live TV, what is that?

16 A. Donnie, Don Imus has a radio show that is also  
17 booked and recorded live and it airs on Fox Business channel  
18 now.

19 Q. On TV?

20 A. On TV. So that's why it was a radio show/live  
21 TV show.

22 Q. And then, on the following page, VH1 "Big  
23 Morning Buzz Live" with Carrie Keagan?

24 A. Uh-huh. [Affirmative.]

25 Q. What is that?

1           A.           I don't think it's on the air anymore either.  
2 All these shows are changing, but this was two years ago.  
3 It's like a morning talk show that they had, the Big Morning  
4 Buzz, they talked about what was hot, what was going on that  
5 day in the world, pop culture, da, da, da, da, da. And they  
6 liked Hulk Hogan. And the guy Andrew, he is not there  
7 anymore, but he was a big wrestling fan for one of the  
8 producers.

9           Q.           And this was shown on VH1 --

10          A.           Correct.

11          Q.           -- the music channel?

12          A.           Yes.

13          Q.           And then, after that talks --

14          A.           And they had a show, you know, that was on  
15 VH1, Hulk Hogan's family reach, I don't know what it was  
16 called, Hulk's best or something.

17          Q.           The reality program?

18          A.           Reality program. So, he had a relationship  
19 with VH1.

20          Q.           And then next, it says Sirius/XM rounds, what  
21 does that mean?

22          A.           XM rounds means you're not just doing one,  
23 it's almost like a car wash at ESPN. It is like, if you  
24 notice, it says schedule under Sirius XM, 11:35, we did one  
25 show, Shade 45; at noon, we did Busted Open, which is the

1 wrestling show; then we did Morning Mash Up, Sam Roberts Show  
2 was the sports show. So, we did like four different channels  
3 within the XM, so that's what that means, the rounds. We  
4 didn't just do one interview.

5 Q. Okay.

6 A. So that's what that means.

7 Q. And again, all of these shows are on?

8 A. Sirius XM, different channels. I couldn't  
9 tell you what the numbers are.

10 Q. And when it says WRAP --

11 A. That means we're finished.

12 Q. -- that means done for the day?

13 A. Uh-huh. [Affirmative.]

14 Q. And the next one there is CNN Showbiz Today?

15 A. Uh-huh. [Affirmative.]

16 Q. Is that a yes is show on CNN?

17 A. Uh-huh. [Affirmative.]

18 Q. Was kind of show?

19 A. Showbiz Today, it is no longer on the air  
20 either. They canceled a lot of these shows this year, I  
21 think. It was basically like Entertainment Tonight, Access  
22 Hollywood. It was just Showbiz Today on CNN.

23 Q. And why did you book Hulk on that show?

24 A. Because again, the audience is who we want to  
25 reach and it was a good show to do at the time for anybody.

1 Q. And then, following that, it has  
2 WallStreetJournal.com Video, what is that?

3 A. Wall Street Journal is a major, one of the top  
4 read newspapers in the world. And the WallStreetJournal.com,  
5 which everyone uses their dot coms now, this guy does  
6 in-depth interviews, Lee, and he videotapes them and they  
7 run on which there is the Kardashians and the UFC business.  
8 I had links for him to see other ones so he could see them  
9 if he wanted to look at them, kind of let the character of  
10 the show. And so he wanted to discuss the business of  
11 pro wrestling. That was canceled.

12 Q. When was that canceled?

13 A. Hulk canceled it.

14 Q. When was that?

15 A. He canceled it about 3 o'clock that day.

16 Q. Do you know why he canceled it?

17 A. He just told me he didn't want to do it.

18 Q. Did he actually make the call to cancel it?

19 A. No. I had to.

20 Q. But you don't know why he wanted it canceled?

21 A. (Witness shakes head in the negative.) No,  
22 sir.

23 Q. In here, you pointed out that there is a link  
24 to the Kardashians. Why did you use that link?

25 A. The interviewer sent me these links and so I



1 just attached them, the Business of UFC and the Kardashians.  
2 He was showing different types of interviews he had done.  
3 That's simply that.

4 Q. When -- Going back to something you had  
5 mentioned earlier, I take it from what you had said before  
6 that having Hulk Hogan as a figure head on this media tour  
7 allowed TNA to get its name out through media it might not  
8 otherwise have been able to do; is that right?

9 MR. VOGT: Objection to form.

10 A. Can you repeat that?

11 Q. (By Mr. Berry) Sorry. I probably didn't ask  
12 that the best way. By having Hulk Hogan do this media tour,  
13 would he get TNA's name through this national media outlet  
14 that it might not otherwise have been able to get on?

15 A. Yes.

16 MR. VOGT: Objection.

17 Q. (By Mr. Berry) When you pitched him for these  
18 interviews, did you pitch him as Hulk Hogan?

19 A. Yes.

20 Q. You didn't pitch him as Terry Bollea?

21 A. No, sir.

22 Q. Why not?

23 A. Because I was, 'cause everybody talks, no one  
24 talks about him as Terry Bollea. They pitch him as  
25 Hulk Hogan, the character, and he pretty much is that

1 character when he does his interviews and he would wear  
2 IMPACT Wrestling clothes and promote the brand.

3 Q. When you booked these media appearances, who  
4 at the individual shows would you deal with?

5 A. The bookers, the TV booker, the celebrity  
6 booker, whoever, there is different booker/producers for each  
7 show. I just have relationships with them for doing this for  
8 25 years.

9 Q. And when you called those folks up, did you  
10 tell them why Hulk Hogan was going to be up there, that he  
11 was promoting a particular thing?

12 A. Yeah. They, we were promoting the "Bound For  
13 Glory" pay-per-view special that was the big event of the  
14 year.

15 Q. Give me an example of how you might, or well,  
16 like how you did pitch something in October, for this October  
17 media tour?

18 A. Because I would say, hey Julie, I've got our  
19 "Bound For Glory," you know our annual like a/k/a  
20 wrestlemania for TNA. It's going to be whatever date it is  
21 in April, I mean October. And I've got Hulk Hogan available  
22 to do some media that week and I'd really love it if you  
23 could, we could have him on to talk about the event, how to  
24 buy it, you know, is it pay-per-view, how to get it, da, da,  
25 da, da, da, and that would be about it. They would say of

1 course, we would love to have him on. We love Hulk. That  
2 was it. Booked. It's easy.

3 Q. And then, I guess as it got closer, you had to  
4 figure out the particular times?

5 A. Do the logistics and times and all that after  
6 you, you know, I try to formulate a schedule that makes  
7 sense.

8 Q. Kind of shifting gears here, do you recall the  
9 initial news reports about a Hulk Hogan sex tape back in the  
10 spring of 2012?

11 A. No, sir, I do not.

12 Q. All right.

13 A. Again, I didn't work there and I wasn't paying  
14 attention to anything Hulk Hogan. I didn't work there. Oh,  
15 wait.

16 Q. Spring of 2012.

17 A. Spring of 2012. No, no, I did work there, but  
18 no, I didn't hear a thing about it. I had no idea.

19 Q. Let me --

20 A. I thought you said spring of 2011. Sorry.

21 Q. No, no, no. That's all right. Let me mark  
22 this document here as Exhibit 2013, sorry, 21, 213. I'm  
23 getting years mixed in here.

24 (E-mail from Chris Thomas to Jules Wortman  
25 of March 7, 2012, Bates label TNA-G0001 was  
marked as Ex. No. 213 and attached to the  
original of this deposition.)

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

(Document handed to witness.)

A. I don't remember seeing this e-mail to be honest with you, but Chris Thomas that worked there, he worked there for years, he did, he obviously knew about it. But I don't remember seeing that e-mail, I'll be honest.

Q. Okay. And just for the --

A. If I did, I don't know if I opened it or read it, but I don't remember that at all. I was, I was completely in shock when I saw it in October.

Q. Okay. Just for the record's purposes, Exhibit 213 is a, an e-mail from Chris Thomas to Ms. Wortman and copied to Lindsey Bynum, is that --

A. That's the piece. Uh-huh. [Affirmative.]

Q. That was sent on March 7, 2012 at 9:54 in the morning and it is subject line is Hogan sex tape and it has a link to an article or a posting on tmz.com.

A. (Witness nods head in the affirmative.)

Q. Let me show you another, we'll mark this as Exhibit 214.

(E-mail from Jules Wortman to Dixie Carter of March 8, 2012, Bates label TNA-G0005 was marked as Ex. No. 214 and attached to the original of this deposition.)

(Document handed to witness.)

A. I guess I responded to that.

1 Q. Well, let me first ask you a question. Do you  
2 recognize this document?

3 A. I don't recognize this document, I'll be  
4 honest with you.

5 Q. Okay. Just again for the record what it is,  
6 what Exhibit 214 is is an e-mail from you to Dixie Carter  
7 that was sent on March 8, 2012 at 1:43 P.M. and the subject  
8 is TMZ interview; is that right?

9 A. Correct.

10 Q. Okay.

11 A. I mean, I'm reading it, but I don't remember  
12 this at all.

13 Q. Okay. On this e-mail, there is a link here, a  
14 website link, again to tmz.com. Do you see that?

15 A. Is that the same one that Chris had sent?

16 Q. In Exhibit 213? No.

17 A. No, it's different. Well, I must have been, I  
18 must have been on the road. I don't remember this part at  
19 all, to be honest with you on that.

20 Q. Okay. Well --

21 A. Maybe I meant to not remember it because this  
22 is not something I want to talk about, but it looks like  
23 something came back up on TMZ and I sent to Dixie 'cause she  
24 was the one that liked to deal with Hulk. I asked her if she  
25 could get an official statement from him in case we needed it

1 because we didn't know anything about it. Like it's obvious  
2 I didn't know a thing about it.

3 Q. Right.

4 A. So maybe I did see something. Obviously, I  
5 saw something in March, but I don't remember that at all.

6 Q. What I'd like to do is show you a video which  
7 is this link that you sent to Dixie.

8 A. Uh-huh. [Affirmative.]

9 Q. I'll show you the video and we'll see if that  
10 refreshes --

11 A. Refreshes me. Okay.

12 Q. -- your recollection.

13 A. Okay.

14 Q. So, this previously has been marked as an  
15 Exhibit in one of the earlier depositions as Exhibit 88 and  
16 it's, I guess for record purposes, it's Bates labeled GAWKER  
17 23416 and it's titled TMZ Live March 7, 2012 for our purposes  
18 in the litigation.

19 A. Okay.

20 Q. What we'll do is bring the computer here so  
21 you can see --

22 A. Okay.

23 Q. -- the video and see if it refreshes your  
24 recollection --

25 A. Okay.

1 Q. -- at all.

2 A. And I apologize that I don't remember this.

3 Q. No, no. This happened a while back.

4 A. Yeah.

5 (Whereupon video being played via computer  
6 -- TMZ Live of March 7, 2012)

7 MR. HARVEY LEVIN: First of all, welcome.

8 MR. HULK HOGAN: Yeah. First of all, guys,  
9 there were several brunettes. Okay. Let's at least get that  
10 part down. No. Between the divorce from Linda, at the time  
11 I met Jennifer, I had about 4-1/2 months that I really went  
12 crazy and I actually wrote about in my book about staying  
13 drunk and crazy and hitting all the bars, so I was really out  
14 of my mind for a while.

15 MR. HARVEY LEVIN: So you actually, we're  
16 going to get to the sex tape, but you obviously prefer  
17 blondes, but was going for brunettes kind of a statement  
18 against Linda Hogan?

19 MR. HULK HOGAN: No, Brother. It was just, I  
20 don't know what was wrong with me. I was just so shocked and  
21 broken up, you know, 'cause I dreamed that I was the guy that  
22 would always stay married and then, you know, when the whole  
23 thing went down and, you know, Linda fell in love with a  
24 younger guy, I guess, everything, and it's nobody fault but  
25 my own, so I'm not blaming her. But you know, I just went

1 crazy for a while.

2 MR. HARVEY LEVIN: Okay. So Hulk, I want to  
3 say, we are also joined on the phone with David Houston who  
4 is your lawyer in this whole thing, so David welcome, as  
5 well.

6 MR. DAVID HOUSTON: Thank you, Harvey.

7 MR. HARVEY LEVIN: So, walk us through this.  
8 When, so what year was this tape shot?

9 MR. HULK HOGAN: Well Brother, I don't know  
10 what year it was, but this year around September, end of  
11 September, October, I will have been with Jennifer, Bob, for  
12 five years.

13 MR. HARVEY LEVIN: That long?

14 MR. HULK HOGAN: So the question I'm wondering  
15 is, you know, why would someone hold onto this for at least  
16 five years, you know, and then do this to me now? That's  
17 what I don't understand. And I did not know it was being  
18 done. You know, I didn't say hey, brunette, let's put a  
19 camera up and have a sex tape. I mean, I'm dumb, but I'm not  
20 dumb and dumber. And so I just don't know why someone would  
21 do this, number one; and number two, why they would wait  
22 five years to release it, at least five years.

23 MR. MIKE WALTERS: Hulk, Harvey, David, this  
24 is Mike Walters. I've actually seen part of this tape, kind  
25 of how we wrote the story. And from what it looks like what



1 from what I have seen it appears to be a little bit old. And  
2 the reason I say that is from what, you know, Hulk and what  
3 he looks like and how he's, what he's discussing about  
4 working out and stuff, it seems, and I discussed that earlier  
5 when we did the web story, but it only shows a brunette, it  
6 shows him, it's a bedroom, it appears to be security footage  
7 from inside of a home and it shows Hulk kind of going towards  
8 a brunette woman, and then, that's all that I've seen. I  
9 haven't seen whether or not this tape is some lengthy thing  
10 or what exactly happened after that.

11 MR. HARVEY LEVIN: Does that ring any kind of  
12 a bell with you, Hulk?

13 MR. HULK HOGAN: You know, Harvey, I'm not  
14 trying to be smart aleck and I'm horrible with remembering  
15 names, you know, but that's why I call everybody Brother.  
16 But during that time, that four, five-month window where I  
17 was going crazy, I was, one of the first things I did when I  
18 sat down with Jennifer, I said, I don't even remember  
19 people's names, you know, last weekend that I met, I meet so  
20 many people, much less girls, five or six or seven years ago  
21 or five years ago, whenever it was, it was just I couldn't  
22 remember her name if I had to. And the truth is, it wasn't  
23 just one brunette. I was running pretty wild there for a few  
24 months.

25 MR. DAVID HOUSTON: Harvey, we started hearing

1 about this last night. One of the first things we tried to  
2 do was put together a picture of who this could be. It  
3 sounds like it's somebody that hit hard times and had the  
4 tape, and then, hooked up with someone that had the ability  
5 to try to market it. In fairness to them, we want to put  
6 them on notice they're committing a felony. And a lot of  
7 people aren't worried about civil liability because they may  
8 not have anything, but I think everybody is worried about  
9 whether they are going to spend time in jail. And in  
10 reality, this is notice. If anybody goes forward with this  
11 thing, we're going to find them and we're going to have them  
12 prosecuted.

13 (End of computer play.)

14 A. I do remember seeing that, to be honest with  
15 you. I don't remember it being in March or whenever, but I  
16 remember that interview.

17 Q. (By Mr. Berry) And what is your recollection?

18 A. Just that, just seeing it and then I obviously  
19 sent it to Dixie asking her to get, you know, so we could  
20 have something on record in case it happened. But I don't  
21 remember that.

22 Q. In looking back at Exhibit 214, having seen  
23 the interview now --

24 A. Uh-huh. [Affirmative.]

25 Q. -- do you know what you meant here by saying

1 the only thing this is all in the past and in the book, why  
2 does he feel that he has to talk about it now?

3 A. I must have been saying why is this out there?  
4 Like if he said, like, I guess I was quoting him from the  
5 context of what he was saying where he said this has all been  
6 in my past and I've written about it in my book, I don't  
7 know, I haven't read his book, so I don't know if he said  
8 anything about his sexcapades or not, but I guess I was  
9 saying why does he feel like he has to talk about it right  
10 now. I'm like, can you get as official statement if you can.  
11 We felt so, I'm just saying we felt so out of it because I  
12 didn't know about it, I guess that's what I'm saying. And  
13 then, I totally forgot about it again until, I guess, 'cause  
14 I don't remember this.

15 Q. Did you -- Do you recall whether you thought  
16 that he should not be talking about the sex tape at that  
17 point?

18 A. I don't, I don't recall. I just think what I  
19 said on March 8th to Dixie, I said, why is he talking about  
20 this now? Like maybe she knew, I don't know why. I mean, I  
21 don't know if I meant why is she asking, I mean, why is he  
22 talking about it, did it leak that day earlier or something?  
23 I don't remember this.

24 Q. Do you recall whether you were concerned about  
25 how he was handling the sex tape story at that point?

1           A.           No, I wasn't.

2           Q.           No, I wasn't, like you weren't concerned or  
3 no, you don't recall?

4           A.           I don't recall. 'Cause I don't recall this at  
5 all.

6           Q.           Do you recall whether there was additional  
7 media coverage of the sex tape story after this TMZ report  
8 but prior to the Gawker posting in October 2012?

9           A.           My recollection is no. I think when it hit  
10 me, I guess when I saw the entire video was October, whatever  
11 day it was, right before we were going to New York. That's  
12 the first time I really remember it.

13          Q.           Do you recall whether you were monitoring  
14 media coverage of the sex tape issue again between this March  
15 period of 2012, early March 2012, prior to the Gawker report?

16          A.           I wasn't, no. I think Chris, Chris that  
17 worked for me that had worked there forever is the one that  
18 brought it to our, my attention on that other e-mail that I  
19 guess I didn't recall, March 7th.

20          Q.           Uh-huh. [Affirmative.]

21          A.           So . . . But I have, we get Google alerts,  
22 that's how we monitor things on anyone's name. So if any  
23 talent or any, you know, I would have Google alerts for all  
24 of our talent and all of our events. So anything that had to  
25 do with Hulk Hogan could have shown up with them whether I

1 was monitoring that or not. Does that make sense?

2 Q. Uh-huh. [Affirmative.]

3 A. So . . .

4 Q. Do you recall any conversations with  
5 Dixie Carter around this March time period about the sex  
6 tape?

7 A. I do not recall. I had a lot of conversations  
8 with Dixie that didn't go anywhere.

9 Q. Right. I'm going to show you a document which  
10 we'll mark as --

11 A. 215.

12 Q. Yeah. Thank you. We'll mark this as 215.  
13 You're learning quick.

14 (E-mail from Dixie Carter to Hogan of March 8,  
15 2012, Bates label TNA-G0006 was marked as  
16 Ex. No. 215 and attached to the original of  
17 this deposition.)  
18 (Document handed to witness.)

19 Q. This is a document that is Bates labeled  
20 TNA-G0006 and I don't think you've seen this before.

21 A. I've not. Huh-uh. [Negative.]

22 Q. This is an e-mail from Dixie Carter that was  
23 also sent on March 8th. If you'd just take a second to read  
24 this.

25 A. What time was my e-mail to her? So this was  
two hours after I sent that e-mail to her. Okay.

Q. Right. Does seeing this refresh your

1 recollection about whether you had any communications with  
2 Dixie Carter around this time concerning the sex tape?

3 A. Honestly, not really.

4 Q. Okay.

5 A. I mean, I think obviously, I sent this and she  
6 sent this to Terry and Eric, his partner.

7 Q. Okay. Does it refresh your rec --

8 A. But it's obvious that we didn't know that he  
9 was doing this.

10 Q. Does it refresh your recollection at all about  
11 your thoughts in response to seeing the TMZ video that we  
12 looked at a few minutes ago?

13 A. Say that again.

14 Q. Does seeing this e-mail from Dixie Carter  
15 refresh your recollection at all about your thoughts  
16 concerning the video from TMZ that we watched a few minutes  
17 ago?

18 A. Yeah. It sparks that I remember seeing that  
19 interview and it sparks that I did. I don't remember a lot  
20 of the detail. I think it was probably in passing because I  
21 didn't know what was going on with Hulk or what anybody else  
22 knew. That was the first I had seen it, obviously.

23 Q. Does it refresh your recollection at all about  
24 whether you thought from a PR perspective that Hulk was  
25 handling the sex tape issue appropriately or not?

1 MR. VOGT: Objection to form.

2 A. I wish we had known that he was going to be  
3 doing that, so yes, I don't. I did have obviously, had an  
4 objection to how he was handling it, but I didn't think much  
5 about it after that. I mean, I gave it to Dixie to handle.

6 Q. (By Mr. Berry) Do you recall what your  
7 objection was?

8 A. I think my main objection would have been, and  
9 this is not me saying what my objection was, 'cause honestly,  
10 I, this is very unfamiliar to me in my memory.

11 Q. Right.

12 A. But my objection would be that would not be  
13 the way I would handle something like that and we should have  
14 all known that he was doing this interview because he was  
15 representing our company at the time.

16 Q. Do you recall how you thought that it should  
17 have been handled?

18 MR. VOGT: Objection to form.

19 A. There was a lot of ways it could be handled,  
20 but no, no.

21 Q. (By Mr. Berry) I'm going to show you another  
22 document that we'll mark as Exhibit 216. I'll go ahead and  
23 mark it, mark them all.

24 MR. VOGT: What?

25 MR. BERRY: Mark them all.

1 Q. (By Mr. Berry) Right. We'll go in tandem  
2 here and I'll mark one as 216 and another as 217 because they  
3 kind of go together.

4 (E-mail from Chris Thomas to Jules Wortman of  
5 April 26, 2012, Bates label TNA-G0008 was  
6 marked as Ex. No. 216 and attached to the  
7 original of this deposition.)

8 (Article of dailytelegraph.com.au, Bates label  
9 GAWKER 24295-96 was marked as Ex. No. 217 and  
10 attached to the original of this deposition.)

11 Q. I'll give them to you at the same time.

12 (Documents handed to witness.)

13 MR. BERRY: The e-mail is 216 --

14 MR. VOGT: Okay.

15 MR. BERRY: And the article is 217.

16 MR. VOGT: Okay.

17 Q. (By Mr. Berry) So --

18 A. I guess, I remember seeing this.

19 Q. Okay. First, with Exhibit 216, this is, do  
20 you recognize this document?

21 A. I don't recognize it, no, sir, I don't, but  
22 it's obviously to me.

23 Q. Okay. This is an e-mail from Chris Thomas?

24 A. Chris. Uh-huh. [Affirmative.]

25 Q. That was sent to you on April 26th, right?

A. Correct.

Q. And the subject line is just more Hogan. Do



1 you see that?

2 A. Yeah. It was probably from the March 7th or  
3 whatever when he sent, he probably just sent this one.

4 Q. And what it is is a link to an article in the  
5 dailytelegraph.com?

6 A. Uh-huh. [Affirmative.]

7 Q. And so then Exhibit 217, I'll tell you, is  
8 the, and I guess you can see some at the bottom, this is the  
9 article that was linked there. I guess, you --

10 A. Did I respond to this e-mail?

11 Q. I don't have a response.

12 A. Okay. Because I don't, I remember seeing this  
13 picture 'cause they were doing, I remember them doing  
14 something at Mardi Gras or something. I remember seeing this  
15 picture, but I don't know if it was really with this or not.

16 Q. Do you recall seeing this article in the  
17 Daily Telegraph?

18 A. I do not.

19 Q. Looking at the second page, I know you were  
20 looking at this before, there is underneath the bold print,  
21 there is a sentence that says, Gossip website The Dirty.com  
22 has published the first grainy images from the movie - which  
23 has prompted speculation as to who the mystery woman is.

24 Do you remember a time when the images from  
25 the sex tape came out?

1           A.           I do not.

2           Q.           Does seeing this article refresh your  
3 recollection about that at all?

4           A.           Honestly, no, sir, it does not.

5           Q.           Are you familiar with something called the  
6 TNA Asylum?

7           A.           Is it one of those dirt sheets? They call  
8 them dirt sheets like they're gossip, things on the wrestling  
9 world or something?

10          Q.           It may be. So, I take it, it's not affiliated  
11 with TNA?

12          A.           No.

13          Q.           All right. So --

14          A.           Lot of fan sites, they have all these weird  
15 names and stuff.

16          Q.           So fast forwarding then to October of 2012 --  
17 Actually, can we take, this may actually be a good time for a  
18 quick break?

19          A.           Yes.

20                       VIDEO TECHNICIAN: We are off the record at  
21 11:30.

22                       (Whereupon a brief recess was had.)

23                       VIDEO TECHNICIAN: We're back on the record at  
24 11:30, or excuse me, 11:40.

25          Q.           So just fast forwarding from the spring of

1 2012 to October 2012, right before we broke, I may have asked  
2 you this but just to kind of get back into it. Do you recall  
3 that Gawker posted a story and excerpts from the sex tape in  
4 October 2012?

5 A. I do.

6 Q. Okay. I'm going to mark as Exhibit 218  
7 another document here.

8 (E-mail from Chris Thomas to Dixie Carter,  
9 Andy Barton, Dean Broadhead and Jules Wortman  
10 of October 4, 2012, Bates label TNA-G0014 was  
11 marked as Ex. No. 218 and attached to the  
12 original of this deposition.)

13 (Document handed to witness.)

14 A. Got it.

15 Q. Do you recognize this document?

16 A. I do remember this. This was the day after I  
17 had, yeah.

18 Q. What is this?

19 A. I guess Chris saw the sex tape on Gawker and  
20 sent it to the executive team at the label.

21 Q. At TNA?

22 A. I mean, TNA, sorry.

23 Q. Okay. And so, just for the record's purposes,  
24 this is an e-mail that was sent by Chris Thomas on  
25 October 4th at 3:09 P.M., right?

A. Yes, sir.

Q. Okay. And you recall receiving this e-mail?

1           A.           Yes, I do.

2           Q.           And the e-mail was sent to Dixie Carter who we  
3 talked about earlier and it was sent to you. It also says  
4 that it was sent to Andy Barton, who is that?

5           A.           He was like the, I can't remember what his  
6 title was, but it was like him, they were the, Dixie, Andy  
7 and Dean were the three, they ran the company. One of them  
8 was the CFO, COO or whatever, Chief Operating Officer, Andy  
9 was like Executive Vice President or something. I can't  
10 remember their titles.

11          Q.           And when you mentioned Dean before, that is  
12 the Dean Broadhead that this e-mail was also sent to?

13          A.           Uh-huh. [Affirmative.]

14          Q.           Was this how you first learned that the  
15 excerpts of the tape had been posted?

16          A.           Correct. Well, I think it is. I know, I  
17 don't remember, I remember about 3 o'clock the afternoon  
18 after I had sent our itinerary to Hulk, because I sent it on  
19 a Wednesday, the itinerary, and then I sent an updated one on  
20 Friday because I added Atlas Security because I didn't want  
21 to be the only person with him after this, but I can't  
22 remember if it was from Chris or it showed up in my Google --

23          Q.           Okay.

24          A.           -- to be honest with you. But I mean, it was  
25 around that time it was mid afternoon, I remember that.

1 Q. And you just had mentioned sending out a  
2 revised itinerary. The e-mail that we looked at earlier that  
3 you had sent to Terry Bollea with the schedule attached to  
4 it, that was sent on October 5.

5 A. That was sent, that said updated, because I  
6 added, basically I had added.

7 Q. Okay. And so, at this point, you and  
8 Hulk Hogan were set to embark on that media tour then in just  
9 a few days, right?

10 A. (Witness nods head in the affirmative.)

11 Q. I'm going to show you another document now  
12 that we'll mark as Exhibit 219.

13 (E-mail from Jules Wortman to Dixie Carter of  
14 October 4, 2012, Bates label TNA-G0016 was  
15 marked as Ex. No. 219 and attached to the  
16 original of this deposition.)

16 (Document handed to witness.)

17 Q. Have you had a chance to look at it?

18 A. Now, yeah. Uh-huh. [Affirmative.]

19 Q. Do you recognize this document?

20 A. I don't remember this one, to be honest with  
21 you but.

22 Q. What this document appears to be is a chain of  
23 e-mails?

24 A. Dixie telling us no comment. Court will  
25 handle it. And I said really. No comment basically what I

1 was saying.

2 Q. Okay. And so these e-mails were sent on  
3 October 4th after Chris had sent?

4 A. Chris sent that and Dixie responded. Dixie,  
5 it looks like Dixie responded to Chris, and then, I responded  
6 to Dixie, really no comment. We've got a media tour next  
7 week. We need to figure that out because we're not canceling  
8 the media tour.

9 Q. Right. And what, do you recall what you  
10 understood Dixie to mean in her e-mail?

11 A. She's basically saying that there will be no  
12 comment and the courts will handle. I don't get that, but  
13 that's what she said.

14 Q. Okay. And then, you had responded to media  
15 tour next week, no comment.

16 A. It was kind of like, really.

17 Q. It wasn't confirming her instruction; do you  
18 recall?

19 A. That was questioning, I'm like okay. It's  
20 hard to read in, sometimes it's hard to read e-mails what  
21 they mean. Lord knows, I don't know what it means. It's  
22 2-1/2 years later.

23 Q. So you don't recall one way or another?

24 A. No.

25 Q. I'm going to mark another document here as

1 Exhibit 220.

2 (E-mail from Dixie Carter to Jules Wortman of  
3 October 4, 2012, Bates label TNA-G0017 was  
4 marked as Ex. No. 220 and attached to the  
5 original of this deposition.)

6 (Document handed to witness.)

7 Q. Do you recognize this document?

8 A. This one makes, this one, I mean, it's  
9 starting, now that there is more coming out, like with the  
10 responses, it's starting to make a little more sense because  
11 of how I wanted to handle it.

12 Q. Okay. This e-mail is an e-mail from  
13 Dixie Carter sent again in that same e-mail chain responding  
14 to your e-mail which we just talked about and it's copied  
15 again to Chris Thomas and Andy Barton and Dean Broadhead.  
16 What does Dixie say there?

17 A. She says no comment. This will be handled in  
18 the courts. Howard Stern will talk about it no matter what.  
19 You're going to need to make sure no one else does.

20 Q. Okay. What did you understand Dixie to be  
21 saying there?

22 A. Basically, that we're as a company not to say  
23 anything about the sex tape, that I guess Hulk would be  
24 handling it in the courts and that Howard Stern is going to  
25 talk about it, anyway, because that's what he does and that I  
need to make sure no one else talks about it which whatever.

1 Q. What do you mean?

2 A. What do I mean?

3 Q. (Nods head in the affirmative.)

4 A. You're going to make sure no one else does is  
5 a pretty strong statement, and as a PR professional, you know  
6 how you have to handle things like that, and that's not the  
7 way you handle it.

8 Q. And how did you understand that you should  
9 handle it then?

10 A. How do I know how to handle it?

11 Q. No. Sorry. Back at that time. Sorry. I  
12 didn't ask the question exactly as I wanted. At that time,  
13 how did you under, what was your understanding of how you  
14 should handle the sex tape issue?

15 A. My understanding of this e-mail, about how she  
16 addressed it in this e-mail?

17 Q. Correct.

18 A. It appears that she's wanting me to make sure  
19 that no one talks about it in the media, whether it's Hulk or  
20 the media asking him a question. That's what it appears to  
21 me.

22 Q. And what did you think at that point that you  
23 should do? It sounded like you may have thought that this  
24 was a little unrealistic.

25 A. Well again, this all broke, this was in a



1 15-minute period of when Chris sent this, so I was probably  
2 assimilating at that point what the situation should be. But  
3 me doing PR as long as I have done it, and knowing how you  
4 address live television shows and whatever, is you don't go  
5 make demands because that's going to give them all the more  
6 reason to feel the fire. You just, you prepare your client  
7 to say the proper thing, and then, you don't try to negotiate  
8 with the TV show because or media because if you handle it  
9 properly, you don't have to.

10 Q. So in-between -- At that point, how did you  
11 think it should be handled properly?

12 A. Again, at that point, I probably wasn't, I  
13 probably hadn't sat to analyze how exactly it should be  
14 handled. This was all like in 15 minutes after it came out.  
15 So, I can't answer that question right now. Because I hadn't  
16 talked to Hulk or anyone to understand what, where they were  
17 at this point either.

18 Q. Did you, between the time that you got this  
19 information on October 4th and the time that y'all traveled  
20 to New York on October 8th, did you have an opportunity to  
21 think about how this should be handled on the media tour?

22 A. Yes, by then, yes, I did. But not 15 minutes  
23 in, I did not.

24 Q. I apologize. By the point that you got to  
25 New York on October 8th, how did you think it ought to be

1 handled?

2 A. How I thought it ought to be handled  
3 personally, me, was to have Hulk be prepared to, you know, I  
4 had a statement for Hulk. It's obvious that this was out  
5 there, there is no secret. And I had a statement prepared  
6 for him that was handwritten on a folder because I thought  
7 about it over the weekend and whatever.

8 But what I would do is I would take, any time  
9 we did a tour, I would have the housekeeping or whomever at  
10 the front desk would take Hulk T-shirts, a pair of scissors  
11 to cut up his shirts, 'cause he liked to cut them up. So I  
12 would have his shirts hanging in the closet, that and a  
13 folder with the talking points on the tour which would be  
14 talking about "Bound For Glory" and the itinerary would be in  
15 a folder. On this particular time, I wrote down, this is  
16 what you should say, handwritten on his folder, and that's  
17 what I did.

18 Q. Okay. So, let me just ask you about each of  
19 those things. First, for this particular tour, did you  
20 provide shirts, TNA shirts, like you said?

21 A. Yes.

22 Q. What kind of shirts were they?

23 A. They were like turquoise. If I remember  
24 correctly, they were the ones that we were promoting at the  
25 time so, you know, and the one he liked and it was turquoise

1 with black IMPACT Wrestling on it or whatever, written black  
2 and white.

3 Q. And then, the idea was that he would wear  
4 those shirts for the media appearances?

5 A. Which he did.

6 Q. Then you had talking points that were prepared  
7 and put into a folder. What were those talking points?

8 A. They would say anything from this is so and so  
9 is defending the title for our 10th annual "Bound For Glory"  
10 pay-per-view. This is their third time defending the  
11 champion, you know, the belt. Just talking points about the  
12 event and how many years TNA had been in business, you know,  
13 your typical talking points about the event. That was it.

14 Q. And how were those talking points to be used?

15 A. I would -- Well I would, it would be used for  
16 him to remember what to say. You know, they were just like  
17 more like cue cards, and then, when you're prepping the  
18 producers of the shows, you pretty much are giving them the  
19 same information regarding the TV, I mean the "Bound For  
20 Glory" is this, it's airing at this time, it's on, it's on  
21 pay-per-view, make sure you at least get these three points  
22 in.

23 Q. So kind of going back to our discussion about  
24 pitching Hulk Hogan for this media tour, the idea was that  
25 both the host of the show and Hulk Hogan would know what was

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.

1 Q. Over the next two days, October 9th and  
2 October 10th, did you spend time with him?

3 A. Yes, sir.

4 Q. Like how did y'all spend time together?

5 A. We did a media tour.

6 Q. So you were with him?

7 A. I was with him pretty much all day except he  
8 had a couple of breaks, we had a couple of breaks during the  
9 day and he would go to his room and I would go to mine or I  
10 would be out just going, meeting with some of my friends or  
11 whatever. But I did not spend all day with him.

12 Q. But otherwise --

13 A. But most of the day when we were doing media.  
14 We had a car service that would drive us around.

15 Q. And y'all were together in the car?

16 A. Uh-huh. [Affirmative.]

17 Q. And then you were with him during each of the  
18 media appearances?

19 A. Correct.

20 Q. Did he --

21 A. I wasn't by his side during, when he was on  
22 television. I was in the Green Room.

23 Q. Right. But otherwise, y'all were together?

24 A. Yeah.

25 Q. Did he follow your advice about handling the

1 sex tape issue?

2 A. He could have tried to. I don't know if he  
3 did or not.

4 Q. Do you recall whether he did?

5 A. Do you have some of the TV clips?

6 Q. We do. We do.

7 A. Well then, we can watch those and you can  
8 answer that.

9 Q. Sitting here, before looking at any clips, do  
10 you have any recollection of whether he followed your advice?

11 A. He definitely talked about it, so I would say  
12 he did not follow my advice.

13 Q. I'm going to show you another document that  
14 we'll mark as Exhibit No. 220.

15 MR. VOGT: 21.

16 Q. (By Mr. Berry) Oh, sorry.

17 A. I only have 19.

18 Q. No. Shane is right.

19 A. Oh, you're right. I got 21 in front of me.

20 (String of e-mails of October 10 and 11, 2012,  
21 Bates label TNA-G0042-43 was marked as Ex.  
22 No. 221 and attached to the original of this  
deposition.)

23 (Document handed to witness.)

24 Q. So I'll mark this as Exhibit 221. Sorry about  
25 the confusion.

1           A.           Okay. Pardon the typos. I guess I was typing  
2 on my phone.

3           Q.           We've all been there. And do you understand,  
4 just I should have pointed this out with some of the other  
5 ones, but I think it's obvious, the way it prints out is in  
6 reverse order --

7           A.           Right.

8           Q.           -- most recent on top. Do you recognize this  
9 document?

10          A.           I don't recognize it, but I understand it.

11          Q.           This is an e-mail exchange between you and  
12 Dixie Carter, right?

13          A.           Well, I think it started with the girls sent  
14 me the links from the interview from Morning Buzz, so I  
15 forwarded them to probably Dixie and whomever else, social  
16 guy so they could put it on line because it was airing, you  
17 know, this was all leading up to that week. So that was  
18 probably what that was. And then Dixie is like, she was  
19 probably flying to Phoenix because that's where we were going  
20 that week or that's where the "Bound For Glory" was. So HLN  
21 apparently was only about the tape. Was there something  
22 else? If you have any issue with Phoenix paper call Eric or  
23 Dean. And I said yes, a lot more "Bound For Glory" and  
24 spike. Two segments.

25          Q.           Just to stop you for a second there. It says



1 BFG, so that means --

2 A. "Bound For Glory." Uh-huh. [Affirmative.]  
3 Weber was getting it done with Hulk at 5. I don't know what  
4 that was. I mean, I have no idea what -- Oh, that was  
5 probably at the airport, the Phoenix paper, since I was on  
6 the road or something.

7 Q. Okay.

8 A. And Weber was the guy that was in marketing at  
9 the label at the time. And you know, nothing, Dixie always  
10 had, you know.

11 Q. So is she then responding --

12 A. She always, the questioning was, she was  
13 questioning if HLN covered "Bound For Glory," and I said yes,  
14 all the media covered our info, even if he didn't, they took  
15 good care of us. They would bring it to "Bound For Glory."

16 Q. The media would?

17 A. Yes.

18 Q. And the "he" you're referring to was  
19 Hulk Hogan then?

20 A. Yes, sir.

21 Q. And this accurately reflected your thoughts at  
22 the time?

23 A. Yes, sir.

24 Q. And so were you saying, were you intending --  
25 Well, what were you intending to say to Dixie?

1           A.           Well, Dixie was implying that everything was  
2 about the sex tape only.

3           Q.           Right.

4           A.           Correct? I mean, that's what it looks like to  
5 me. And I was, I was letting her know if she didn't see all  
6 the interviews that we got our hits in about "Bound For  
7 Glory," whether it was the interviewer making sure that it  
8 was sent and they would put up a lower third of our logo and  
9 all that. So that's what I meant by that.

10          Q.           But that Hulk didn't really cover it?

11          A.           If he didn't, if he didn't, it was covered.  
12 But he did cover it a lot. I'm just saying she was implying  
13 that it wasn't.

14          Q.           I want to talk to you about a couple of the  
15 specific media you had asked about, some of the videos. You  
16 recall Hulk's appearance on that Howard Stern show that week  
17 that morning?

18          A.           Yeah, first morning we started, yes.

19          Q.           How did you think that his appearance on that  
20 show went?

21          A.           It went probably about what I expected it to  
22 be. I knew, I knew going in that Howard Stern was going to  
23 be pretty explicit or graphic or more open. We all did.  
24 It's Howard Stern. Then we were going to move on. It went  
25 about like I expected it to be, honestly.

1 Q. I want to play you a couple of clips --

2 A. Okay.

3 Q. -- from the Howard Stern broadcast on  
4 October 9, 2012, and I guess like that other one from TMZ,  
5 this was played earlier at another deposition, and so it's  
6 marked already as Exhibit 94. And what we're doing, Stern is  
7 interviewing, it's some of these, you know, went on for some  
8 time, so we'll just play some clips.

9 A. The clips.

10 Q. Yeah. And this is a clip that runs from --

11 A. I probably don't remember exactly what all was  
12 said.

13 Q. Yeah. No, no.

14 A. And you're not allowed in his studio.

15 Q. You're not allowed in Howard Stern's studio?

16 A. No.

17 Q. But Hulk was obviously in there?

18 A. Right. I was in a Green Room with porn stars,  
19 but anyway.

20 Q. So this clip runs from roughly 11 minutes and  
21 4 seconds into the broadcast through 12 minutes and  
22 39 seconds, so it's about a minute and-a-half clip. It's  
23 just the audio.

24 (Whereupon, audio being played via computer  
25 -- Howard Stern, October 9, 2012)

1 MR. HULK HOGAN: And I'm not trying to be a  
2 really pompous ass, but you know, I want to say something  
3 right off I'll probably live to regret. You know, this thing  
4 has totally upended my world, but in the situation I was in,  
5 I didn't want to be overly aggressive, right, 'cause it was  
6 my friend's girl, you might say.

7 MR. HOWARD STERN: Yes.

8 MR. HULK HOGAN: Things could have been to a  
9 whole another level and I was trying to be cool, you mean.

10 MR. HOWARD STERN: What do you mean? I'm not  
11 getting this.

12 MS. ROBIN QUIVERS: He was being polite.

13 MR. HULK HOGAN: Thank you, Robin.

14 MR. HOWARD STERN: You didn't want to bang  
15 her.

16 MR. HULK HOGAN: No. You know, I've wrestled  
17 guys in the room, guys that are my friends.

18 MR. HOWARD STERN: Yeah.

19 MR. HULK HOGAN: But with guys that aren't my  
20 friends, I'll get really, much more aggressive.

21 MR. HOWARD STERN: I don't understand what  
22 you're saying. How come I'm not catching on?

23 MR. HULK HOGAN: You know, I was, I was just  
24 trying --

25 MR. HOWARD STERN: What does Hulk Hogan mean?

1 MS. ROBIN QUIVERS: He was laid back. It was  
2 just a, sort of like a grading the pipes as opposed to a full  
3 long --

4 MR. HOWARD STERN: Affair?

5 MS. ROBIN QUIVERS: Yeah. He wasn't in there  
6 doing what really done.

7 MR. HOWARD STERN: You are saying that, in  
8 other words, your performance would have been way more  
9 intense?

10 MR. HULK HOGAN: I'm not saying anything. I'm  
11 just saying it was a bad situation.

12 MR. HOWARD STERN: Oh, I get what you're  
13 saying now. You're saying hey, when I bang a chic, you know,  
14 really into, I behave a certain way in the bedroom?

15 (End of computer audio.)

16 Q. (By Mr. Berry) What was your reaction?

17 A. I don't remember, I can't understand what he  
18 said. Did he say, did he say would I bag a certain chic in  
19 the bedroom?

20 Q. Yeah. We can play it again.

21 A. That's what Howard said.

22 Q. Yeah.

23 A. I couldn't hear it.

24 Q. Do you think at that point it was Hulk?

25 A. Can't believe we're doing this.

1 Q. Was he trying to deflect the discussion of the  
2 sex tape at that point?

3 MR. VOGT: Objection to form.

4 A. I can't answer that.

5 Q. (By Mr. Berry) Do you recall your reaction to  
6 the Howard Stern interview at the time?

7 A. My reaction?

8 Q. (Nods head in the affirmative.)

9 A. My reaction is it is what it is.

10 Q. How did you think it worked from your  
11 perspective? Did you think that the appearance went well?

12 A. I can't say that. I don't think any  
13 appearance on Howard Stern goes well for anybody, so that's  
14 just my opinion. So I can't answer that honestly.

15 Q. Why do you say that the appearance didn't go  
16 well on Howard Stern for anybody?

17 A. He's a shock job, that's what he does. He  
18 tries to deflect and catch people off guard. You got to be  
19 on your toes.

20 Q. Do you recall during the media tour that Hulk  
21 did an interview with TMZ?

22 A. I know it happened, but I didn't know it was  
23 happening until people were calling me, telling me he was on  
24 the show. I did not set that up.

25 Q. Do you know who did?

1           A.           I have no idea.

2           Q.           So you learned about it after the fact?

3           A.           I learned about it while it was happening  
4 'cause people started calling me.

5           Q.           Who did you learn from?

6           A.           I don't remember. I think Chris, actually, my  
7 office might have been one of them called me.

8           Q.           Do you recall which day during the media tour  
9 that interview took place?

10          A.           I know we had a break, I'd have to look. I  
11 think it might have been the second day. Let me -- We were  
12 doing --

13          Q.           I mean, I can tell you. It was on  
14 October 9.

15          A.           Oh, okay. I know that we had TV. We had a  
16 break, whatever, yeah, it was the 9th. Yeah. We had that  
17 break and then I was out doing something and then Hannity  
18 cancelled and so, then Piers Morgan, so it was some time that  
19 afternoon, I think. I just didn't remember what day.

20          Q.           What do you -- You never saw the interview  
21 itself?

22          A.           No.

23          Q.           What do you recall hearing about the  
24 interview?

25          A.           The only thing I heard was that Hulk called in

1 and was talking live on the air to Harvey and one of the  
2 other guys. And I think that's all I remember. I don't  
3 remember. Someone said Hulk just called in to TMZ live, I  
4 remember that. And then, I was like well, I didn't set that  
5 up and I don't know why he would be doing that.

6 Q. Was that interview consistent with your  
7 objectives for the media tour?

8 A. Well, it wasn't on my media tour.

9 Q. Do you know what they were talking about on  
10 the TMZ interview?

11 A. I have no idea, but I would assume that it was  
12 about why we're here.

13 Q. The sex tape?

14 A. I would assume.

15 Q. Did you ever talk to Hulk about that interview  
16 after it occurred?

17 A. No, sir, not that I remember.

18 Q. Did that interview on TMV have any effect on  
19 the media tour?

20 A. No, sir.

21 Q. Did it affect the nature of any interviews  
22 that occurred afterwards?

23 A. I don't recall. We didn't do many more after  
24 that.

25 Q. Well, you had like the whole second,



1       October 10th, right?

2               A.            Yeah.  But some of it was canceled, remember,  
3       'cause Hulk didn't want to do the Boston Journal, whatever.

4               Q.            Do you have a recollection of whether it  
5       increased the focus on the sex tape?

6               A.            I do not.

7               Q.            I'm going to show you another one of these  
8       interviews that was the Sway in the Morning show on Sirius,  
9       Shade 45?

10              A.            Oh, right, right, right.  Was it on TV or  
11       video?

12              Q.            Video and audio.

13              A.            Oh.  They streamed some of those shows, I got  
14       it.

15              Q.            Right.  What kind of show is Shade 45?

16              A.            It's more like the Eminem, I think it's  
17       Eminem's channel on XM and there is a DJ on there called  
18       Sway.  It's one of the hip-hop channel.

19              Q.            Do you recall that interview?

20              A.            I don't recall the interview per se, but I  
21       recall being at Sirius and doing a bunch of interviews.  
22       Sometimes that, when Sirius was there, his other publicist  
23       came over and was talking to him, so I didn't, I can't  
24       remember her name, Elizabeth.

25              Q.            Was she there that day?

1           A.           She came to Sirius. I didn't see her any  
2 other times.

3           Q.           And they spent time together then at Sirius  
4 that day?

5           A.           And I was not anywhere around.

6           Q.           Do you know what they discussed?

7           A.           I have no idea.

8           Q.           Did you have any communications with her about  
9 the individual?

10          A.           Not really, no.

11          Q.           Any conversations with her about her views of  
12 how Hulk should handle the sex tape in the media?

13          A.           Not that I recall.

14          Q.           Did you talk to Hulk about what she said about  
15 how he should handle the sex tape issue during the media  
16 tour?

17          A.           No, I did not.

18          Q.           Okay. Coming back to this Sway in the Morning  
19 show, this is, I guess we'll mark this as 222.

20                       (Disk of video clip of Sway in the Morning of  
21 10/10/12 was marked as Ex. No. 222 and  
attached to the original of this deposition.)

22          Q.           What we'll do is --

23          A.           Do you guys represent Gawker all the time or  
24 just for cases like these? I mean, are they your ongoing  
25 client?

1 Q. We can talk.

2 MR. SAFIER: We can take a break.

3 MR. BERRY: Why don't we go off the record for  
4 a minute.

5 MR. VOGT: Hold on. Has this been produced  
6 yet?

7 MR. BERRY: Yes. Sorry. I'll come back to  
8 that. We'll go off the record. Yes. What I have marked as  
9 Exhibit 222 here is the Sway in the Morning audio or sorry,  
10 video clip, which is Bates number GAWKER 23420-029.

11 MR. VOGT: Thank you.

12 MR. BERRY: Why don't we go off the record for  
13 a second.

14 VIDEO TECHNICIAN: We're off the record at  
15 12:15.

16 (Whereupon a discussion off the record.)

17 VIDEO TECHNICIAN: We're back on the record at  
18 12:16.

19 Q. (By Mr. Berry) So what Exhibit 222 is is  
20 this, is a video of the Sway in the Morning interview from  
21 October 10, 2012.

22 A. That day, he didn't have on, he didn't have on  
23 a IMPACT Wrestling T-shirt yet, did he?

24 Q. No. Well, that's what I going to ask you  
25 about.

1           A.           It's the same color, but it's not the IMPACT  
2 Wrestling shirt.

3           Q.           Right.

4           A.           He had it on the day before for sure.

5           Q.           Okay.

6           A.           Just noticed that.

7           Q.           Okay. But on this particular interview, he's  
8 not wearing the TNN shirt?

9           A.           No, he's not.

10          Q.           And again, like with the Stern one, we'll just  
11 play a couple of clips here. This one is from about  
12 5 minutes and 1 second into the broadcast to about 6 minutes  
13 and 46 seconds.

14                       (Whereupon, clip playing via computer  
15 -- Sway clip)

16                       MR. HULK HOGAN: Nobody cares about woe is me,  
17 'cause everybody has got one. They care about what now, you  
18 know.

19                       MR. SWAY CALLOWAY: Okay, yeah.

20                       MR. HULK HOGAN: And so, here is where we are  
21 at, Bro.

22                       MR. SWAY CALLOWAY: Well, you know what I want  
23 to do? I want to come back.

24                       MR. HULK HOGAN: No. I got to tell you right  
25 now.

1 MR. SWAY CALLOWAY: If you don't mind.

2 MR. HULK HOGAN: You said it was my show. You  
3 said it was my show.

4 MR. SWAY CALLOWAY: You're right.

5 MR. HULK HOGAN: Did you say that?

6 MR. SWAY CALLOWAY: We're not going to play  
7 any songs.

8 MR. HULK HOGAN: Did you say that?

9 MR. SWAY CALLOWAY: This is your show, Hulk  
10 Hogan.

11 MR. HULK HOGAN: Thank you. Let me at least  
12 finish this thought, Bro.

13 MR. SWAY CALLOWAY: Okay. Because I'm going  
14 to give you all this time. Go ahead.

15 MR. HULK HOGAN: Thank you. So anyway, so  
16 where we're at now is, you know, at the end of the day, I did  
17 this. I wasn't on drugs. I made a choice. But the woe is  
18 me story is on a personal level, dude, my life was already  
19 screwed --

20 MR. SWAY CALLOWAY: Yeah.

21 MR. HULK HOGAN: -- with my situation. I was  
22 at an all-time low. These two people that I pray to God are  
23 friends of mine, you know, for two years, they were going  
24 hey, you know, I want to get with you, I want to do this, and  
25 then my boys, well yeah, it's cool, it's cool. I said no.

1 MR. SWAY CALLOWAY: Are you talking about a  
2 threesome or --

3 MR. HULK HOGAN: No, no, no. Him offering his  
4 wife to me.

5 MR. SWAY CALLOWAY: His wife.

6 MR. HULK HOGAN: Yeah.

7 MR. CALLOWAY: Don't you think that was weird,  
8 the first time he offered you his wife?

9 MR. HULK HOGAN: Well, I knew they partied,  
10 you know.

11 MR. SWAY CALLOWAY: Oh, okay.

12 MR. HULK HOGAN: I knew they partied and I'd  
13 heard stories. And his wife was gorgeous and she kept  
14 saying, I want to get with you, I want to do this, that and  
15 the other stuff and I want to have sex with you. And I said  
16 no, no, no, no, no. So at the end of the day, I kind of  
17 bottomed out, you know. I was with my boy, you know. We  
18 went back to the house. And when I was at my all-time low, I  
19 just said to hell with it, let's do this thing.

20 And now, I've defended him, I've fought for  
21 him. You know, even with his old boss, Howard Stern, I  
22 fought for him yesterday going, I don't believe he would do  
23 this. Howard said you don't believe it. Last night, I  
24 didn't sleep a bit, Bro, because I got some information last  
25 night that said that he was the one that set the camera up

1 and he did this to me. And even the person that said that to  
2 me, Harvey at TMZ, I don't believe it, I got to see the film  
3 to believe it. And you know, because if he did that to me,  
4 we were never friends.

5 (End of computer play.)

6 Q. (By Mr. Berry) Seeing that clip, does that  
7 refresh your recollection about whether the TMZ interview  
8 changed the nature of some of the interviews that occurred  
9 after?

10 MR. VOGT: Objection to form.

11 A. Seems that way, but I don't recall that at  
12 all.

13 Q. (By Mr. Berry) Was --

14 A. Because I didn't, you know, I didn't hear the  
15 TMZ interview the day before so, you know, I didn't care.

16 Q. What do you mean?

17 A. (No response.)

18 Q. Well, let me ask you a different way. Was  
19 this, was this consistent with the advice that you had given  
20 him?

21 A. No, sir, it was not.

22 Q. Let me play just one more clip from this Sway  
23 in the Morning. This will be towards the end and it starts  
24 at roughly 23 minutes and 43 seconds and it will go about a  
25 minute.

1           A.           Was this after that first clip we heard?

2           Q.           Yes. This is towards the end of the  
3 interview.

4           A.           Okay.

5           Q.           As I say, like 23 minutes, this was right  
6 towards the end of the interview.

7                       (Disk playing via computer -- Sway clip)

8           MR. SWAY CALLOWAY: Hey man, we all have  
9 faults, you know. I mean, you know, I saw the clip. I won't  
10 lie to you, man. It made me a little uncomfortable to see  
11 that, you know, you didn't have a suntan on your butt cheeks.

12           MR. HULK HOGAN: Oh, man. You made me laugh.  
13 Oh, man.

14           MR. SWAY CALLOWAY: That's all I wanted to do.

15           MR. HULK HOGAN: Oh, man.

16           MR. SWAY CALLOWAY: You got to suntan the butt  
17 cheeks, Hulk. All right?

18           MR. HULK HOGAN: Man, wow! That's low, that's  
19 dirty, man.

20           MR. SWAY CALLOWAY: Yeah, man. But listen,  
21 you got a big pay-per-view event that's taking place  
22 Saturday, right?

23           MR. HULK HOGAN: Yeah. Actually, I came to  
24 town to promote, you know, I came to town because, you know,  
25 we've got a new time slot on Spike, it's 8 o'clock every



1 Thursday, TNA. I came to town to promote that, and then this  
2 Sunday, we've got our Super Bowl of wrestling on "Bound For  
3 Glory." So, that's why I originally came here to go on all  
4 the media stuff and talk all kind of crazy wrestling stuff.  
5 And then, I got, you know, fast ball thrown in my head with  
6 this stuff. So, it was a game changer.

7 MR. SWAY CALLOWAY: Use it to your advantage,  
8 man.

9 (End of computer play.)

10 Q. (By Mr. Berry) Do you recall that part of the  
11 interview?

12 A. Like I said, I didn't listen to all the  
13 interviews internally and I don't recall everything that was  
14 said in these interviews then.

15 Q. Do you recall your reaction to that Sway  
16 interview?

17 A. No.

18 MR. VOGT: Objection to form.

19 Q. (By Mr. Berry) Was this an example of him  
20 deflecting and talking about the pay-per-view?

21 A. I guess so.

22 Q. Was it the way that you would have done it?

23 A. No, sir.

24 Q. Do you recall just sitting here today, do you  
25 recall any other media appearances during the media tour?

1 A. Some of them.

2 Q. What do you recall?

3 A. Walking into the outlets, going, checking in,  
4 deflecting the people outside, having them sign autographs.

5 Q. Do you recall any of the specific media  
6 appearances?

7 A. Yes.

8 Q. What?

9 A. Some of them, not all of them, obviously,  
10 because I wasn't in all of them.

11 Q. Which ones do you recall?

12 A. The Today Show, they had him in a ring, but of  
13 course Kathie Lee and Hoda addressed it, they had an  
14 emotional moment.

15 Q. Do you recall others?

16 A. It became a blur at that point.

17 Q. In his lawsuit against Gawker, Hulk claims  
18 that he suffered emotional distress after Gawker posted the  
19 sex tape, the sex tape actually was on his website. When you  
20 were with him during the media tour, did he seem emotionally  
21 distressed?

22 A. He was upset.

23 Q. In what way?

24 A. Well he was, he was upset about what he was  
25 dealing with.

1 Q. Can you think of any examples?

2 A. He was, he's chosen not to bring his wife, she  
3 was going to come, Jennifer, we canceled her, because he  
4 thought it would be too much. I know he was on the phone a  
5 lot with an agent and I think Dave Houston in the car  
6 discussing, he was pretty upset.

7 Q. Do you recall what specifically he was upset  
8 about?

9 A. About the sex tape.

10 Q. But do you recall what aspect, like what in  
11 particular?

12 A. No. I mean, there were no details. It was  
13 just he was, we got to figure this out. This is, this is  
14 awful, horrible for my family, things like that. He was  
15 upset.

16 Q. Was that before or after the TMZ interview?

17 A. That was before.

18 Q. Do you recall after the TMZ interview?

19 A. (Witness shakes head in the negative.)

20 Q. Do you have a specific recollection of those  
21 conversations being before the TMZ interview?

22 A. A lot of them was that first day that we  
23 started, early that day.

24 Q. Can we take just a quick break?

25 A. Uh-huh. [Affirmative.]

1 VIDEO TECHNICIAN: We are off the record at  
2 12:25.

3 (Whereupon a recess for lunch was had.)

4 VIDEO TECHNICIAN: We are back on the record  
5 at 12:59.

6  
7 EXAMINATION BY MR. VOGT:

8  
9 Q. I'm just going to have a few questions for  
10 you. Won't keep you that much longer. I appreciate you  
11 being here with us today. I think one of the things you  
12 testified to was that with respect to Mr. Bollea or Mr. Hogan  
13 that he had a great personality and was very engaging in the  
14 media. Do you recall that?

15 MR. BERRY: Objection as to form.

16 A. Yeah. I do recall saying that.

17 Q. (By Mr. Vogt) Is that how you would  
18 characterize him in media appearances?

19 A. Say that again.

20 Q. How would you characterize Mr. Hogan in media  
21 appearances?

22 A. I would characterize him as the gregarious  
23 Hulk Hogan, the hulkster, the character when he's in, doing  
24 his interviews.

25 Q. During the time period that you were in

1 New York on the press tour for the "Bound For Glory" series  
2 in 2012, was his personality different during that tour?

3 A. His personality was pretty much the same while  
4 doing media, yes.

5 Q. And then, what about while not doing media,  
6 was his personality the same?

7 A. He was a little more, he was a little more  
8 reserved and dealing with the situation.

9 Q. The situation, by that, do you mean the sex  
10 tape?

11 A. Yes, sir.

12 Q. And in discussing some of the specific events  
13 that were planned for the media tour, you had mentioned that  
14 the appearance on Sean Hannity show was canceled at 4 o'clock  
15 that afternoon. Do you recall that?

16 A. I do recall. I don't know, it was late in the  
17 afternoon, I don't recall if it was exactly that time, but  
18 yes.

19 Q. And I think that what you said that it was  
20 because they were huge Hogan fans and they didn't want to  
21 discuss the sex tape. Was that the reason for canceling?

22 A. Sean Hannity is a fan of Hulk Hogan's. He's a  
23 news show. He chose to cancel the interview because he did  
24 not want to go there. He would have rather talked about the  
25 "Bound For Glory" and Hulk Hogan.

1 Q. And who informed you that the interview was  
2 going to be canceled?

3 A. Terra, the booker.

4 Q. And did you convey that information to  
5 Mr. Hogan?

6 A. Yes.

7 Q. And what did he say, if anything, when you  
8 told him that?

9 A. I don't recall him saying anything.

10 Q. When the video from the TMZ live interview was  
11 played a little bit earlier in your deposition, one of the  
12 things that Mr. Houston said was that they intended to find  
13 and prosecute the people responsible. Do you remember that?

14 A. I recall seeing it on the video just now.

15 Q. Do you recall hearing that statement at any  
16 other time?

17 A. Say that again.

18 Q. Do you recall at any point in time anyone,  
19 either Mr. Hogan or anyone on his behalf, indicating that  
20 they were going to find and prosecute the people responsible?

21 A. Yes, I do.

22 Q. Can you tell me about those instances in which  
23 you heard that, who said it?

24 A. It was just usually in passing and it was just  
25 Hulk that I heard say it or Terry saying it, that they were

1 going to figure out who did this and deal with it. I don't  
2 know if he said prosecute, but he said.

3 Q. Approximately how many times would Mr. Hogan  
4 have said that?

5 A. I have no idea, maybe one or two that I heard.

6 Q. Do you recall him saying that while you were  
7 in New York on the press tour in 2012?

8 A. I do.

9 Q. You were asked some questions about the  
10 October 4, 2012 e-mail string with Dixie Carter in which she  
11 made the statement that she wanted to make sure that no one  
12 else talked about the sex tape during the interviews, do you  
13 recall that?

14 A. Yes, sir.

15 Q. It was unrealistic for her to think that the  
16 tape wasn't going to be discussed; is that right?

17 A. In my opinion.

18 Q. It's also not possible on live television to  
19 control what questions interviewers are going to ask, right?

20 A. That's true.

21 Q. And then, you were asked some questions about  
22 preparing Mr. Hogan for the interviews that were going to  
23 take place during New York and the statement that you gave  
24 the handwritten statement on the folder. Do you recall that?

25 A. Yes, sir.

1 Q. And I think one of the things that you said  
2 was when you had spoken with Mr. Hogan about that that he  
3 wanted to make sure that no one would ask him about the tape  
4 at all; is that right?

5 A. He did say that.

6 Q. Was that before he had started any of the  
7 interviews in New York?

8 A. Yes.

9 Q. So, he expressed to you that he didn't want  
10 the tape to be discussed at all on the media tour in 2012?

11 A. He said, my other publicist would handle it  
12 with the producers, they would work deals with the producer.  
13 I don't do that.

14 Q. You said, was that you saying I don't do that?

15 A. I said, I don't do that.

16 Q. But his indication to you in the context of  
17 making that statement was he didn't want to talk about the  
18 sex tape at all; is that right?

19 A. He said he did not want to talk about it.

20 Q. In the --

21 A. And can I interject, aside from Howard Stern,  
22 because everyone knew what that was about.

23 Q. Right. With, in your experience in dealing  
24 with Mr. Hogan, has he always had a tendency to try to  
25 explain too much when he's giving interviews?



1 MR. BERRY: Object as to form.

2 A. I can't answer that. I mean, he talks a lot.

3 Q. (By Mr. Vogt) And one of the things you  
4 mentioned that when he does his interviews he is in  
5 character; is that right, like the Hogan character?

6 A. Hulk Hogan character, yes. He's usually not,  
7 he's referred to as Hulk Hogan on the screen and when they  
8 introduce him, so he's Hulk Hogan when he's doing interviews.

9 Q. And when he's in that character, is that  
10 character likely to deflect from issues?

11 MR. BERRY: Objection as to form.

12 A. Well, never had an issue before, so I couldn't  
13 answer that.

14 Q. (By Mr. Vogt) When the Hogan character, is  
15 that a character that's more likely to take issues head on  
16 rather than try to duck them?

17 MR. BERRY: Objection.

18 A. I would say that I do not know.

19 Q. (By Mr. Vogt) And then, one of the other  
20 clips that you were played, Exhibit 94, which was a clip from  
21 the Howard Stern show, one of the things that Mr. Hogan said  
22 in that interview was that the situation totally upended his  
23 world. Do you recall hearing that?

24 A. I did recall hearing it, yes.

25 Q. Do you recall Mr. Hogan ever saying that in

1 any other instances during the course of your dealings with  
2 him after the sex tape --

3 A. No, sir.

4 Q. -- became public? You mentioned with respect  
5 to the Kathie Lee and Hoda appearance that there was an  
6 emotional moment. What was that emotional moment?

7 A. After, when we got off set, he went to the  
8 bathroom and was crying and him and Kathie Lee were having a  
9 moment talking about how their life has been an open book,  
10 the public.

11 Q. Mr. Hogan was crying?

12 A. Teared up, I wouldn't say bawling crying.

13 Q. And that was in the context of talking about  
14 the sex tape?

15 A. Was talking about how life hits you, I guess,  
16 sometimes.

17 Q. Was Kathie Lee crying?

18 A. She always cries.

19 Q. Well, was she crying at that time?

20 A. No, not really.

21 Q. So, it was just him crying?

22 A. (Witness nods head in the affirmative.)

23 Q. Yes?

24 A. Oh, I'm sorry. Yes. It wasn't like he was  
25 crying. He went to the restroom to compose himself so it

1 wouldn't be like boo-hooing, it was just emotional.

2 Q. Had you ever seen him do anything like that  
3 before?

4 A. No, sir.

5 Q. As far as you're aware, has Mr. Bollea always  
6 maintained that he was secretly recorded on the video without  
7 his permission?

8 A. I have no idea.

9 Q. To your knowledge, was anyone at TNA involved  
10 in releasing the video?

11 A. I have no idea.

12 Q. That's all the questions I have.

13 A. Okay.

14 Q. Thank you.

15

16 REEXAMINATION BY MR. BERRY:

17

18 Q. Let me just follow up on a couple of things.  
19 You had mentioned a conversation with a person from Hannity,  
20 Terra, booker?

21 A. Well, her name is Terra Najob (phonetic),  
22 she's the booker.

23 Q. She's the booker. What exactly do you recall  
24 about that conversation?

25 A. I just remember her calling me about late in

1 the afternoon, she said, Jules, we're going to cancel his  
2 booking tonight. And I said okay, really, why? And she said  
3 well, the obvious reason, Sean is a fan and he really doesn't  
4 want to have the conversation about the sex tape with Hulk,  
5 but he would obviously have to. We're a news channel. So  
6 he's choosing to pull the booking so he does not have to go  
7 there.

8 Q. Did she express any concern that Hulk would go  
9 there?

10 A. No, she did not.

11 Q. During the moment with Kathie Lee, where were  
12 you standing? Did you hear the conversation?

13 A. In the hallway. I didn't hear every word, but  
14 I was in the hall.

15 Q. And did you tell Mr. Vogt everything that you  
16 recall about that conversation?

17 A. I don't really recall all the exact words. I  
18 just remember there was an emotional exchange and that Kathie  
19 Lee was hugging him and saying, you know, I understand when  
20 your private life gets played out in public. I've been there  
21 with her husband, whatever, Frank. And that was about it.  
22 And he was emotionally, he was, you know, he was emotional.  
23 And then he went into the restroom. He excused himself to go  
24 into the restroom. And He was in there for a little while.  
25 I think he was on the phone. That's all I know.

1 Q. Do you know why he went into the restroom?  
2 Did he ever say to you why he went in there?

3 A. I think he wanted to compose himself.

4 Q. Did he ever say that to you?

5 A. No. I'm assuming.

6 Q. I have no further questions.

7 A. Okay.

8 Q. Thank you very much.

9 A. Thank you, guys.

10 VIDEO TECHNICIAN: We're off the record at  
11 1:12.

12

13 FURTHER THIS DEPONENT SAITH NOT.

14

15

16 (The videotaped deposition of Jules Wortman was concluded at  
17 1:12 P.M., April 7, 2015.)

18

19

20

/Signature Not Waived/

21

JULES WORTMAN

22

23

24

25

## REPORTER'S CERTIFICATE

1 STATE OF TENNESSEE)  
2 ) ss.  
3 COUNTY OF DAVIDSON)

4 I, ANNE S. WILSON, Licensed Court Reporter and  
5 Notary Public in and for the state of Tennessee, do hereby  
6 certify that I reported the foregoing proceedings at the time  
7 and place set forth in the caption thereof; that the witness  
8 therein was duly sworn on oath to testify the truth; that the  
9 proceedings were stenographically reported by me in  
10 shorthand; and that the foregoing proceedings constitute a  
11 true and correct transcript of said proceedings to the best  
12 of my ability.

13 I FURTHER CERTIFY that I am not related to  
14 any of the parties herein, nor their counsel, and have no  
15 interest, financial or otherwise, in the outcome of these  
16 proceedings.

17 I FURTHER CERTIFY that I am duly licensed by  
18 the Tennessee Board of Court Reporting as a Licensed Court  
19 Reporter as evidenced by the LCR number and expiration date  
20 following my name below.

21 IN WITNESS WHEREOF, I have hereunto affixed my  
22 official seal and signature this 9th day of April 2015.

23  
24 ANNE S. WILSON, LCR #208  
25 Expiration Date 6/30/2016  
Notary Public thru 10/18/16

**A**

**ability** 8:5 49:4 101:12  
**able** 10:22 29:10 40:8  
 40:14  
**Absolutely** 11:1  
**Access** 38:21  
**accurately** 72:21  
**actual** 18:9  
**added** 59:20 60:6,6  
**additional** 51:6  
**address** 64:4 67:23  
**addressed** 63:16 89:13  
**adjunct** 15:15  
**advance** 26:15  
**advantage** 88:7  
**advice** 69:25 70:10,12  
 86:19  
**Affair** 76:4  
**affect** 8:5 79:21  
**affiliated** 20:21 34:13  
 57:10  
**affirmative** 5:7 9:5  
 12:14 18:1 19:7 27:1  
 27:20 28:9,17,24  
 29:5 30:24 32:15  
 34:21 36:1,24 38:13  
 38:15,17 43:14,18  
 45:8 49:24 51:20  
 52:2 55:22 56:6  
 59:13 60:10,18 63:3  
 69:16 72:2 77:8  
 90:25 97:22  
**affixed** 101:21  
**afternoon** 35:15 59:17  
 59:25 78:19 92:15,17  
 99:1  
**agent** 90:5  
**aggressive** 75:5,20  
**ago** 24:22 37:2 48:20  
 48:21 53:12,17  
**agreed** 8:15 23:10  
**agreement** 2:16  
**ahead** 11:20 23:14  
 27:2 29:10 54:22  
 84:14  
**air** 36:12 37:1 38:19  
 79:1  
**airing** 66:20 71:16  
**airport** 72:5  
**airs** 36:17  
**aka** 1:8  
**al** 1:8 15:13  
**aleck** 48:14  
**alerts** 51:21,23  
**alive** 35:2  
**Allan** 3:15  
**allowed** 40:7 74:14,15  
**all-time** 84:22 85:18  
**analysis** 29:25  
**analyze** 64:13

**Andrew** 37:6  
**Andy** 2:6 58:8 59:4,6,8  
 62:14  
**and-a-half** 19:5,24  
 26:23 74:22  
**Angle** 25:5,9,12  
**Anne** 1:23 4:16 5:12  
 5:25 11:11 101:4,24  
**annual** 41:19 66:9  
**answer** 5:20 8:3 11:5  
 11:15 13:19 24:20  
 64:15 67:15,16 70:8  
 77:4,14 96:2,13  
**answered** 20:9  
**answering** 5:12  
**answers** 5:9  
**anticipate** 6:2  
**anybody** 21:21 30:3  
 38:25 49:10 53:21  
 77:13,16  
**anymore** 37:1,7  
**anyone's** 51:22  
**anyway** 18:12 62:24  
 74:19 84:15  
**apologize** 46:2 64:24  
**apparently** 71:21  
**appear** 32:9  
**appearance** 73:16,19  
 77:11,13,15 92:14  
 97:5  
**appearances** 14:15  
 23:4 29:12 41:3 66:4  
 69:18 88:25 89:6  
 91:18,21  
**appears** 48:1,6 60:22  
 63:18,20  
**applying** 29:25  
**appreciate** 91:10  
**appropriately** 53:25  
**approving** 23:16  
**Approximately** 94:3  
**April** 1:12 2:4 4:1  
 41:21 55:4,23 100:16  
 101:22  
**Arant** 2:17  
**area** 13:4  
**argue** 11:7  
**arrives** 32:12  
**article** 2:5 43:17 55:7  
 55:13 56:4,9,16 57:2  
**aside** 95:21  
**asked** 34:6 44:24 58:1  
 73:15 94:9,21  
**asking** 5:8 11:4 15:8  
 49:19 50:21 63:20  
**asks** 10:20,21,24  
**aspect** 90:10  
**aspects** 18:6  
**ass** 75:2  
**assimilating** 64:2  
**ASSOCIATES** 1:23

**assume** 79:11,14  
**assuming** 100:5  
**Asylum** 57:6  
**Atlantic** 13:16  
**Atlas** 31:12 59:20  
**attached** 8:22 11:22  
 27:5 30:19 40:1  
 42:25 43:22 52:15  
 55:5,8 58:9 60:3,14  
 62:3 70:21 81:21  
**attachment** 31:24 32:1  
**attention** 42:14 51:18  
**Attorney** 3:4  
**attorneys** 3:10 4:6  
**audience** 33:5,17,21  
 35:9 36:11 38:24  
**audio** 74:23,24 76:15  
 80:12 82:9  
**August** 26:5,20 27:21  
 28:4  
**autographs** 89:4  
**available** 26:12 28:20  
 29:1 41:21  
**Awards** 15:12,12  
**aware** 29:6 98:5  
**awful** 90:14  
**awkward** 5:19  
**A.J** 3:10 4:9,12  
**A.M** 2:19 4:2  
**a/k/a** 41:19

**B**

**B** 1:17 2:1 3:3  
**back** 6:6 7:7 8:23  
 10:11 11:13 26:5  
 34:23 40:4 42:9  
 44:23 46:3 49:22  
 57:23 58:2 63:11  
 66:23 76:1 81:18  
 82:7,17 83:23 85:18  
 91:4  
**background** 19:2 27:7  
 27:17  
**bad** 76:11  
**bag** 6:16 27:12 76:18  
**BAJO** 3:4  
**ball** 88:5  
**bang** 75:14 76:13  
**bars** 46:13  
**Barton** 2:6 58:8 59:4  
 62:14  
**based** 11:2 29:8  
**basically** 5:8 8:14 9:6  
 10:19 13:22 17:17  
 32:6 38:21 60:6,25  
 61:11 62:21 67:20  
**Bates** 1:19,20,21 2:2,3  
 2:4,5,6,8,9,9 27:4  
 30:18 42:24 43:21  
 45:16 52:14,17 55:4  
 55:7 58:9 60:13 62:2

70:20 82:10  
**bathroom** 97:8  
**bawling** 97:12  
**becoming** 16:15  
**bedroom** 48:6 76:14  
 76:19  
**beginning** 2:18  
**behalf** 4:13 93:19  
**behave** 76:14  
**believe** 76:25 85:22,23  
 86:2,3  
**bell** 48:12  
**Belmont** 15:15  
**belt** 66:11  
**Berry** 1:15,16 3:9 4:7  
 4:7,22 6:20 9:11  
 11:11 21:24 24:14  
 28:15 40:11,17 49:17  
 54:6,21,25 55:1,11  
 55:13,15 70:16 76:16  
 77:5 82:3,7,12,19  
 86:6,13 88:10,19  
 91:15 96:1,11,17  
 98:16  
**best** 37:16 40:12  
 101:11  
**BFg** 72:1  
**big** 15:12 23:11 25:4  
 25:15 33:5,20 34:3  
 34:10,11,13,13 36:22  
 37:3,7 41:13 87:21  
**bit** 4:25 6:24 7:14  
 22:15 23:6 48:1  
 85:24 93:11  
**black** 66:1,1  
**Blake** 15:13  
**blaming** 46:25  
**bleacher** 34:12  
**blocked** 18:12  
**blondes** 46:17  
**blur** 89:16  
**Board** 101:18  
**Bob** 1:19 27:4,23,25  
 28:1,15 31:12 47:11  
**bold** 56:20  
**Bollea** 1:3,20 4:14  
 30:18 31:10,11,14,18  
 40:20,24 60:3 91:12  
 98:5  
**boohooing** 98:1  
**book** 26:9 27:23 28:17  
 28:18 32:25 33:14  
 38:23 46:12 50:1,6,7  
 97:9  
**booked** 29:17 33:16  
 36:5,17 41:3 42:2  
**booker** 41:5,6 93:3  
 98:20,22,23  
**bookers** 26:13 41:5  
**booker/producers**  
 41:6

**booking** 28:2 99:2,6  
**boss** 18:18 85:21  
**Boston** 80:3  
**bottom** 56:8  
**bottomed** 85:17  
**Boult** 2:17  
**Bound** 23:12 25:2 36:8  
 41:12,19 65:14 66:9  
 66:19 67:24 71:20,23  
 72:2,13,15 73:6 88:2  
 92:1,25  
**Bowl** 88:2  
**Box** 1:24  
**boy** 85:17  
**boys** 84:25  
**Bradley** 2:17  
**brand** 20:10 41:2  
**break** 7:22 57:18  
 78:10,16,17 82:2  
 90:24  
**breaks** 69:8,8  
**brief** 57:22  
**bring** 45:20 72:15 90:2  
**Bro** 83:21 84:12 85:24  
**broadcast** 16:7,9 74:3  
 74:21 83:12  
**Broadhead** 2:6 58:8  
 59:12 62:14  
**broke** 58:1 63:25  
**broken** 46:21  
**Brother** 46:19 47:9  
 48:15  
**Brothers** 13:16  
**brought** 19:10,12  
 51:18 68:5  
**brunette** 47:18 48:5,8  
 48:23  
**brunettes** 46:9,17  
**Bubba** 33:2  
**build** 13:20 14:9,10  
 17:3  
**building** 18:17  
**bunch** 80:21  
**business** 15:19 17:11  
 36:15,17 39:7,10  
 40:1 66:12  
**Busted** 37:25  
**butt** 87:11,16  
**button** 68:2  
**buy** 41:24  
**Buzz** 36:23 37:4 71:14  
**Bynum** 43:13

**C**

**C** 3:1  
**call** 8:14 21:6 25:2,22  
 39:18 48:15 57:7  
 71:22  
**called** 13:8 15:22 25:3  
 34:2,10 37:16 41:9  
 57:5 68:12 78:7,25

79:3 80:17  
**calling** 77:23 78:4  
 98:25  
**CALLOWAY** 83:19  
 83:22 84:1,4,6,9,13  
 84:20 85:1,5,7,11  
 87:8,14,16,20 88:7  
**camera** 47:19 85:25  
**campaign** 17:4  
**cancel** 35:23 39:18  
 92:23 99:1  
**canceled** 35:13,14,16  
 35:18 38:20 39:11,12  
 39:13,15,16,20 80:2  
 90:3 92:14 93:2  
**canceling** 61:7 92:21  
**cancelled** 78:18  
**caption** 2:22 101:7  
**car** 37:23 69:14,15  
 90:5  
**cards** 66:17  
**care** 22:10 72:15 83:17  
 86:15  
**Career** 15:18  
**cares** 83:16  
**Carrie** 36:23  
**Carter** 2:2,3,6,7,8  
 16:25 18:18 30:4  
 43:21 44:6 52:5,14  
 52:20 53:2,14 58:8  
 59:2 60:13 62:2,12  
 71:12 94:10  
**case** 1:5 4:5 6:9 8:13  
 9:8 10:7 29:24 31:9  
 34:6 44:25 49:20  
**cases** 81:24  
**Cast** 14:2  
**catch** 77:18  
**catching** 75:22  
**cause** 17:4 21:7 25:22  
 27:12 28:23 34:7  
 40:23 44:23 46:21  
 50:13 51:4 54:9  
 56:13 65:11 75:5  
 78:4 80:3 83:17  
**celebrity** 41:5  
**center** 25:23  
**certain** 76:14,18  
**CERTIFICATE** 101:1  
**certify** 101:6,13,17  
**CFO** 59:8  
**chain** 60:22 62:12  
**champion** 66:11  
**chance** 60:17  
**changed** 86:8  
**changer** 88:6  
**changing** 37:2  
**channel** 36:15,17  
 37:11 80:17,18 99:5  
**channels** 38:2,8  
**character** 17:16 20:24

21:25 39:9 40:25  
 41:1 91:23 96:5,5,6,9  
 96:10,14,15  
**characterize** 91:18,20  
 91:22  
**characters** 20:16 34:8  
**checking** 89:3  
**cheeks** 87:11,17  
**chic** 76:13,18  
**Chief** 59:8  
**Children's** 15:6  
**choice** 84:17  
**choosing** 99:6  
**chose** 35:23 92:23  
**chosen** 90:2  
**Chris** 1:21 2:4,6 19:9  
 19:18,21 31:11 42:24  
 43:4,12 44:15 51:16  
 51:16 55:4,21,22  
 58:8,17,22 59:22  
 61:3,4,5 62:14 64:1  
 78:6  
**Christian** 15:12  
**Circuit** 1:1,1 4:3  
**civil** 2:20 49:7  
**claims** 89:17  
**clarify** 7:8  
**clarity's** 31:14  
**class** 18:7  
**clearly** 7:10,18  
**CLEM** 1:7  
**client** 31:6 64:6 81:25  
**clients** 14:2 17:24  
**clip** 2:10 74:10,20,22  
 81:20 82:10 83:14,14  
 86:6,22 87:1,7,9  
 96:20  
**clips** 70:5,9 74:1,8,9  
 83:11 96:20  
**close** 17:20 27:21 28:4  
**closer** 42:3  
**closet** 65:12  
**clothes** 41:2  
**CNN** 34:23 36:3 38:14  
 38:16,22  
**coffee** 7:22  
**COHEN** 3:4  
**college** 15:20  
**color** 83:1  
**Columbia** 34:22  
**come** 7:14 28:14 67:10  
 75:22 82:7 83:23  
 90:3  
**comes** 9:2  
**comfortable** 67:16  
**comic** 34:1,2,7  
**comics** 33:20  
**coming** 10:9 29:4 62:8  
 81:18  
**command** 21:15  
**comment** 60:24,25

61:6,12,15 62:16  
**committing** 49:6  
**communications** 53:1  
 81:8  
**company** 15:22,25  
 16:24 17:22 18:17  
 19:16,19 20:13 21:13  
 22:9,12 54:15 59:7  
 62:21  
**completely** 43:10  
**compose** 97:25 100:3  
**computer** 45:20 46:5  
 49:13 74:24 76:15  
 83:14 86:5 87:7 88:9  
**coms** 39:5  
**con** 34:1,2,7  
**concern** 99:8  
**concerned** 50:24 51:2  
**concerning** 53:2,16  
**concluded** 100:16  
**confidential** 8:17,20  
 9:1,3,4,7,19,24  
**confidentiality** 9:21,25  
**confirmation** 26:21  
**confirmed** 26:18 28:3  
 29:9  
**confirming** 28:15  
 61:17  
**confusing** 21:22  
**confusion** 70:25  
**consider** 22:6  
**considered** 9:24  
**consistent** 79:6 86:19  
**constitute** 101:10  
**consultant** 16:15  
**context** 50:5 95:16  
 97:13  
**contract** 20:1  
**control** 94:19  
**conversation** 6:4 67:3  
 98:19,24 99:4,12,16  
**conversations** 52:4,7  
 81:11 90:21  
**convey** 93:4  
**COO** 59:8  
**cool** 75:9 84:25,25  
**copied** 43:13 62:13  
**copy** 8:22,24 9:9 12:3  
**correct** 9:12 12:11  
 22:1 28:21 29:2,7,11  
 29:13 33:18 37:10  
 44:9 55:24 59:16  
 63:17 67:2,4 69:19  
 73:4 101:11  
**correctly** 65:24  
**counsel** 2:19 101:14  
**counter** 10:20  
**country** 15:12 16:2  
**County** 1:1 4:4 101:2  
**couple** 19:22 24:22  
 26:25 69:8,8 73:14

74:1 83:11 98:18  
**course** 5:14 6:21 7:9  
 10:4 15:3 42:1 89:13  
 97:1  
**court** 1:1,18 4:3,4,15  
 5:3 11:22 60:24  
 101:4,18,18  
**courts** 61:12 62:17,23  
**cover** 34:7 73:10,12  
**coverage** 14:24 51:7  
 51:14  
**covered** 15:2 29:18  
 72:13,14 73:11  
**crazy** 46:12,13 47:1  
 48:17 88:4  
**create** 20:10 21:3  
 26:10  
**cries** 97:18  
**crying** 97:8,11,12,17  
 97:19,21,25  
**cue** 66:17  
**culture** 37:5  
**Cummings** 2:17  
**cut** 6:1 65:11,11  
**CUVA** 3:4  
**cyclical** 14:19

---

**D**


---

**D** 1:14  
**da** 37:5,5,5,5,5 41:24  
 41:24,25,25,25  
**Daily** 56:17  
**dailytelegraph.com**  
 56:5  
**dailytelegraph.com.au**  
 2:5 55:7  
**date** 41:20 101:19,24  
**dates** 22:21 23:9,15  
 26:11,22 28:6,19  
**Dauleiro** 3:10  
**Daulerio** 4:9,12  
**Dave** 90:5  
**David** 47:3,4,6,23  
 48:25  
**DAVIDSON** 101:2  
**day** 7:4 13:20 26:9,19  
 27:21 32:10,10 36:14  
 37:5 38:12 39:15  
 50:22 51:11 58:14  
 68:13 69:7,9,11,13  
 78:8,11,19 80:25  
 81:4 82:22 83:4  
 84:16 85:16 86:15  
 90:22,23 101:22  
**days** 9:22,23 28:23,25  
 29:4 32:7,13 60:9  
 69:1  
**dead** 34:25  
**deal** 23:15 41:4 44:24  
 94:1  
**dealing** 23:20 68:16

89:25 92:8 95:23  
**dealings** 97:1  
**deals** 95:12  
**dealt** 68:15  
**Dean** 2:6 58:8 59:7,11  
 59:12 62:14 71:23  
**decide** 32:25  
**deciding** 29:15  
**Defendant** 2:19 3:9  
**Defendants** 1:9  
**defended** 85:20  
**defending** 66:9,10  
**definitely** 7:6 70:11  
**deflect** 77:1,18 96:10  
**deflecting** 88:20 89:4  
**demands** 64:5  
**Denton** 3:10 4:9,11  
**department** 20:2,7  
**depending** 9:15  
**depends** 13:22  
**deponent** 4:5 100:13  
**depose** 10:19  
**deposed** 5:1  
**deposition** 1:11 2:15  
 2:23 4:25 5:15 6:22  
 7:9,17 9:1 10:4,17  
 11:23 26:24 27:5  
 30:19 42:25 43:22  
 52:15 55:5,8 58:10  
 60:14 62:3 70:21  
 74:5 81:21 93:11  
 100:16  
**depositions** 45:15  
**describe** 18:24  
**desk** 65:10  
**detail** 53:20  
**details** 90:12  
**develop** 13:23  
**development** 15:18  
 20:25  
**Diego** 34:3  
**different** 10:9 13:20  
 14:11,12 18:6 25:10  
 38:2,8 40:2 41:6  
 44:17 68:1 86:18  
 92:2  
**director** 27:23  
**dirt** 57:7,8  
**dirty** 87:19  
**Dirty.com** 56:21  
**discovery** 9:8  
**discuss** 35:22 39:10  
 92:21  
**discussed** 17:2 48:4  
 67:17 81:6 94:16  
 95:10  
**discussing** 48:3 90:6  
 92:12  
**discussion** 66:23 77:1  
 82:16  
**Disk** 2:10 81:20 87:7



**distress** 89:18  
**distressed** 89:21  
**diversify** 29:20  
**Division** 2:18 4:2  
**divorce** 5:2,2,4 46:10  
**Dixie** 2:2,3,6,7,8 16:12  
 16:21,23,25 17:7  
 18:18 21:15 23:8  
 30:4 43:21 44:6,23  
 45:7 49:19 50:19  
 52:5,8,14,20 53:2,14  
 54:5 58:8 59:2,6  
 60:13,24 61:4,4,5,6  
 61:10 62:2,12,15,19  
 67:12 71:12,15,18  
 72:9,25 73:1 94:10  
**DJ** 80:17  
**document** 8:23 11:24  
 27:9 30:16,21 31:2  
 42:22 43:2,24 44:2,3  
 52:9,16,17 54:22  
 55:18 58:7,11,13  
 60:11,16,19,22 61:25  
 62:5,6 70:13,23 71:9  
**documents** 12:8 26:25  
 27:18,18,19 55:10  
**doing** 11:6 14:20,20,21  
 15:4 20:15 22:22  
 26:14 28:23 30:8  
 31:7 33:11 37:22  
 41:7 53:9 54:3,14  
 56:13,13 64:3 67:13  
 68:1 69:13 74:6 76:6  
 76:25 78:12,17 79:5  
 80:21 91:23 92:4,5  
 96:8  
**dollars** 15:6  
**Don** 36:16  
**Donnie** 36:16  
**dot** 39:5  
**doubt** 67:18,20  
**dreamed** 46:21  
**drive** 69:14  
**drugs** 84:17  
**drunk** 46:13  
**duck** 96:16  
**dude** 84:18  
**duly** 4:20 101:8,17  
**dumb** 47:19,20  
**dumber** 47:20

---

**E**


---

**E** 1:14,17 2:1 3:1,1  
**earlier** 29:8 31:12 40:5  
 45:15 48:4 50:22  
 59:3 60:2 68:13 74:5  
 93:11  
**early** 51:15 90:23  
**easier** 5:25  
**easy** 22:9 42:2  
**effect** 79:18

**eight-month** 18:5  
**either** 8:15,16 11:3  
 13:23 19:15 37:1  
 38:20 64:17 93:19  
**Elizabeth** 80:24  
**embark** 60:8  
**embarrassing** 67:23  
**Eminem** 80:16  
**Eminem's** 80:17  
**emotional** 89:14,18  
 97:6,6 98:1 99:18,22  
**emotionally** 89:20  
 99:22  
**employees** 19:5 20:1  
**ended** 16:15  
**engaging** 24:16 91:13  
**entertainment** 15:18  
 38:21  
**entire** 51:10  
**Eric** 33:7 53:6 71:22  
**ESPN** 34:12,12 37:23  
**establish** 14:6  
**et** 1:8  
**evening** 36:3  
**event** 13:21 20:11  
 23:11 25:4 34:2  
 41:13,23 66:12,13  
 87:21  
**events** 18:16 23:3  
 51:24 92:12  
**everybody** 22:24 40:23  
 48:15 49:8 83:17  
**everyday** 13:20 20:5  
**evidenced** 101:19  
**Ex** 11:22 27:5 30:19  
 42:25 43:22 52:15  
 55:5,7 58:9 60:14  
 62:3 70:20 81:20  
**exact** 26:19 28:6 99:17  
**exactly** 13:18 32:4  
 48:10 63:12 64:13  
 67:19 74:11 92:17  
 98:23  
**EXAMINATION** 1:15  
 1:15 4:22 91:7  
**example** 41:15 88:19  
**examples** 90:1  
**excerpts** 58:3 59:15  
**exchange** 71:11 99:18  
**excuse** 16:22 57:24  
**excused** 99:23  
**executive** 13:15 58:18  
 59:9  
**Exhibit** 10:7,11 11:21  
 27:3 30:17 42:22  
 43:12,20 44:6,16  
 45:15,15 49:22 54:22  
 55:17 56:7 58:6  
 60:12 62:1 70:14,24  
 74:6 82:9,19 96:20  
**exhibits** 10:10

**expected** 73:21,25  
**experience** 95:23  
**experienced** 23:20  
**expiration** 101:19,24  
**explain** 5:5 9:16 14:12  
 95:25  
**explicit** 73:23  
**expose** 20:10 22:9  
**exposure** 17:3  
**express** 99:8  
**expressed** 95:9  
**extent** 6:6  
**extra** 6:17  
**extract** 14:9  
**e-mail** 1:19,20,21 2:2,3  
 2:4,6,7,8 27:4 28:1  
 28:10 30:18 31:9,18  
 31:24 42:24 43:3,6  
 43:12,21 44:6,13  
 51:18 52:14,20,23,24  
 53:14 55:4,11,21  
 56:10 58:8,22,25  
 59:2,12 60:2,13  
 61:10 62:2,11,11,12  
 62:13 63:15,16 71:11  
 94:10  
**e-mails** 2:9 10:5 31:20  
 60:23 61:2,20 70:20

---

**F**


---

**fact** 78:2  
**fairness** 49:5  
**Faith** 15:11  
**fake** 21:21  
**fall** 24:23  
**familiar** 57:5  
**family** 16:24 17:11  
 37:15 67:21 90:14  
**fan** 34:24 37:7 57:14  
 92:22 99:3  
**fans** 35:21 92:20  
**far** 98:5  
**fast** 7:13 57:16,25 88:5  
**fault** 46:24  
**faults** 87:9  
**feel** 7:4,17 8:3 12:9  
 27:11 50:2,9 64:6  
 67:16  
**fell** 46:23  
**fellows** 25:17  
**felony** 49:6  
**felt** 50:11,11  
**figure** 21:7 24:12 40:6  
 42:4 61:7 90:13 94:1  
**film** 86:2  
**final** 30:10  
**financial** 101:15  
**find** 49:11 93:12,20  
**finish** 84:12  
**finished** 38:11  
**fire** 64:6  
**firm** 13:6,7,12  
**firms** 13:14  
**first** 4:20 7:1 10:20  
 15:16 19:11 26:6  
 32:21 33:11 44:1  
 46:7,8 48:17 49:1  
 51:12 53:22 55:17  
 56:22 59:14 65:19  
 73:18 85:8 87:1  
 90:22  
**fit** 33:10  
**five** 47:12,16,22,22  
 48:20,21  
**five-month** 48:16  
**FL** 3:5  
**floaters** 20:4  
**Florida** 1:1 2:20 4:4  
**flying** 71:19  
**focus** 80:5  
**folder** 65:6,13,15,16  
 66:7 67:6 68:8 94:24  
**folks** 6:23 10:9 14:23  
 15:1 24:6 41:9  
**follow** 69:25 70:12  
 98:18  
**followed** 70:10  
**following** 36:14,22  
 39:1 101:20  
**follows** 4:20  
**follow-up** 10:25  
**footage** 48:6  
**foregoing** 101:6,10  
**Foreign** 1:18 11:22  
**forever** 51:17  
**forgot** 7:2 50:13  
**form** 2:24 11:5,15  
 24:10 40:9 54:1,18  
 77:3 86:10 88:18  
 91:15 96:1,11  
**formalities** 2:22  
**formulate** 42:6  
**forth** 6:7 7:7 11:13  
 101:7  
**forward** 49:10  
**forwarded** 71:15  
**forwarding** 57:16,25  
**fought** 85:20,22  
**four** 38:2 48:16  
**Fox** 34:23 36:17  
**Frank** 99:21  
**free** 7:4,17 8:3 12:9  
 27:11  
**Friday** 28:2 59:20  
**friends** 17:18,20 69:10  
 75:17,20 84:23 86:4  
**friend's** 75:6  
**front** 65:10 70:19  
**full** 76:2  
**fun** 17:6  
**further** 100:6,13  
 101:13,17

---

**G**


---

**game** 88:6  
**Gawker** 1:7,8 2:5 3:9  
 4:9,11 45:16 51:8,15  
 55:7 58:3,17 81:23  
 82:10 89:17,18  
**gears** 42:8  
**GENE** 1:3  
**general** 21:11,12,25  
**George** 15:10  
**getting** 42:23 72:3  
 75:11  
**Gill** 15:11  
**girl** 19:9,10,12 75:6  
**girls** 48:20 71:13  
**give** 9:24 27:7 41:15  
 55:9 64:5 84:14  
**given** 86:19  
**giving** 5:9 15:5 66:18  
 95:25  
**glasses** 27:10,15  
**Glory** 23:12 25:2 36:8  
 41:13,19 65:14 66:9  
 66:20 67:25 71:20,23  
 72:2,13,15 73:7 88:3  
 92:1,25  
**go** 5:6 6:6 7:7,7,8,22  
 11:13,20 12:6,13  
 15:7 22:25 23:8,14  
 25:2,3 26:10 27:2  
 29:9,14 31:6,6 52:8  
 54:22 55:1,3 64:4  
 67:25 69:9,9 77:15  
 82:3,8,12 84:14  
 86:24 88:3 92:24  
 99:6,8,23  
**God** 84:22  
**goes** 49:10 77:13  
**going** 4:24 6:2,3 7:20  
 9:1,17 10:8,12,18  
 16:14,14 17:19,21  
 26:25 28:18 29:25  
 30:7,16,25 32:17  
 37:4 40:4 41:10,20  
 46:16,17 48:7,17  
 49:9,11,11 51:11  
 52:9 53:21 54:2,21  
 58:6 60:11 61:25  
 62:18,23 63:4 64:5  
 66:23 69:10 70:13  
 71:19 73:22,22,24  
 80:7 82:24 84:6,13  
 84:23 85:22 89:3  
 90:3 91:9 93:2,20  
 94:1,16,19,22 99:1  
**good** 5:23 6:21 7:10  
 14:1,2,6 23:23,25  
 24:5 29:16 33:15  
 38:25 57:17 72:15  
**Google** 51:21,23 59:22

**Gore** 15:13  
**gorgeous** 85:13  
**gossip** 56:21 57:8  
**gotten** 68:13  
**grab** 7:22 27:10,12  
**grading** 76:2  
**grainy** 56:22  
**graphic** 73:23  
**Gras** 56:14  
**great** 24:13,15 91:13  
**Green** 69:22 74:18  
**gregarious** 91:22  
**guard** 77:18  
**guess** 6:20 7:14 8:12  
 8:13 14:14 20:15  
 21:12,14 32:16 34:9  
 42:3 43:25 45:16  
 46:24 50:4,8,12,13  
 51:10,19 55:16 56:8  
 56:9 58:17 62:22  
 68:20 71:1 74:4  
 81:19 88:21 97:15  
**guy** 21:2 33:6 35:3  
 37:6 39:5 46:21,24  
 71:16 72:8  
**guys** 46:8 75:17,17,19  
 79:2 81:23 100:9

---

**H**


---

**H** 1:17 2:1  
**half** 20:2  
**hall** 99:14  
**hallway** 99:13  
**hand** 19:2  
**handed** 6:18 11:24  
 27:9,14 30:21 43:2  
 43:24 52:16 55:10  
 58:11 60:16 62:5  
 70:23  
**handle** 54:5,13 60:25  
 61:12 62:10 63:6,7,9  
 63:10,14 64:8 81:12  
 81:15 95:11  
**handled** 54:17,19  
 62:16 64:11,14,21  
 65:1,2  
**handling** 50:25 53:25  
 54:4 62:23 69:25  
**handwritten** 34:18  
 65:6,16 67:5 94:24  
**hanging** 65:12  
**Hannity** 35:12,17  
 78:17 92:14,22 98:19  
**Hannity/Fox** 35:12  
**happen** 9:20  
**happened** 34:23 46:3  
 48:10 49:20 68:8  
 77:22  
**happening** 77:23 78:3  
**happens** 7:3  
**happy** 7:19

**hard** 13:19 14:12,12  
 49:3 61:20,20  
**Hardy** 25:5,9,12 35:3  
 35:6  
**Harvey** 46:7,15 47:2,6  
 47:7,13,23 48:11,13  
 48:25 79:1 86:2  
**head** 5:21 19:7 21:7  
 31:6 34:22 39:21  
 40:6 43:18 60:10  
 63:3 68:24 77:8 88:5  
 90:19 96:15 97:22  
**hear** 33:7 42:18 76:23  
 86:14 99:12,13  
**heard** 78:25 85:13  
 87:1 93:23,25 94:5  
**hearing** 2:25 48:25  
 78:23 93:15 96:23,24  
**HEATHER** 1:7  
**hell** 85:19  
**help** 14:14  
**helped** 21:3 22:9  
**helpful** 5:25  
**helping** 26:14  
**helps** 10:14  
**Hendersonville** 12:19  
**hereunto** 101:21  
**hey** 41:18 47:18 76:13  
 84:24 87:8  
**HH** 31:23  
**higher** 22:5  
**Hill** 15:11 34:22 35:5  
**hipper** 35:3  
**hip-hop** 80:18  
**hit** 49:3 51:9 67:25  
 68:2  
**hits** 73:6 97:15  
**hitting** 46:13  
**HLN** 71:20 72:13  
**Hoda** 33:13 89:13 97:5  
**Hogan** 1:4 2:3 20:20  
 22:2,10,13 24:9  
 28:20 30:6 31:15  
 32:2 35:1,21 36:7,7  
 37:6 40:6,12,18,25  
 41:10,21 42:9,14  
 43:16 46:8,18,19  
 47:9,14 48:13 51:25  
 52:14 55:25 60:8  
 66:24,25 72:19 75:1  
 75:8,13,16,19,23,25  
 76:10 83:16,20,24  
 84:2,5,8,10,11,15,21  
 85:3,6,9,12 87:12,15  
 87:18,23 91:12,20,23  
 92:20,25 93:5,19  
 94:3,22 95:2,24 96:5  
 96:6,7,8,14,21,25  
 97:11  
**Hogan's** 26:17 37:15  
 92:22

**hold** 47:15 82:5  
**Hollywood** 38:22  
**home** 25:2,3 48:7  
**honest** 34:14 43:4,6  
 44:4,19 49:14 59:24  
 60:20  
**honestly** 53:3 54:9  
 57:4 73:25 77:14  
**hooked** 49:4  
**hope** 27:15  
**hopefully** 29:20  
**horrible** 48:14 90:14  
**Hospital** 15:6  
**host** 66:25  
**hot** 8:1 37:4  
**hotel** 68:10,12  
**hours** 52:24  
**house** 85:18  
**housekeeping** 11:19  
 65:9  
**Houston** 47:3,6 48:25  
 90:5 93:12  
**Howard** 24:4 32:21  
 33:2,3,4 62:17,23  
 73:16,22,24 74:3,15  
 74:24 75:7,10,14,18  
 75:21,25 76:4,7,12  
 76:21 77:6,13,16  
 85:21,23 95:21 96:21  
**Huffington** 26:14  
 34:20,21  
**huge** 12:7 33:23 34:24  
 35:21 92:20  
**hugging** 99:19  
**huh-uh** 5:21 52:19  
**Hulk** 1:4 20:20 22:2,10  
 22:13 24:9 25:5,16  
 25:19 26:17 28:20,25  
 29:4,15 30:6 31:15  
 32:2 33:4,24 35:1,21  
 36:7,7 37:6,15 38:23  
 39:13 40:6,12,18,25  
 41:10,21 42:1,9,14  
 44:24 46:8,19 47:2,9  
 47:14,23 48:2,7,12  
 48:13 51:25 53:21,24  
 59:18 60:8 62:22  
 63:19 64:16 65:3,4  
 65:10 66:24,25 72:3  
 72:19 73:10 74:17  
 75:1,8,13,16,19,23  
 75:25 76:10,24 77:20  
 78:25 79:3,15 80:3  
 81:12,14 83:16,20,24  
 84:2,5,8,9,11,15,21  
 85:3,6,9,12 87:12,15  
 87:17,18,23 89:17  
 91:23 92:22,25 93:25  
 96:6,7,8 99:4,8  
**hulkster** 91:23  
**Hulk's** 29:9 37:16

73:16  
**husband** 99:21

---

**I**

---

**iconic** 24:12  
**idea** 42:18 66:3,24  
 68:5,9 72:4 78:1  
 79:11 81:7 94:5 98:8  
 98:11  
**image** 14:9,10 18:17  
**images** 56:22,24  
**IMPACT** 41:2 66:1  
 82:23 83:1  
**implying** 73:1,12  
**important** 5:19 22:2,5  
 22:6,7  
**improper** 11:9  
**Imus** 36:16  
**Imus/radio/Fox** 36:15  
**increased** 80:5  
**independent** 13:14  
**indicating** 93:19  
**indication** 95:16  
**individual** 13:21 14:5  
 14:7,20 20:16 41:4  
 81:9  
**industry** 18:7  
**info** 72:14  
**information** 23:18  
 30:11 31:8 64:19  
 66:19 85:24 93:4  
**informed** 93:1  
**initial** 42:9  
**initially** 16:14  
**inside** 48:7  
**instance** 2:19  
**instances** 93:22 97:1  
**instruction** 61:17  
**intended** 93:12  
**intending** 72:24,25  
**intense** 76:9  
**interaction** 23:6  
**interest** 26:11 101:15  
**interested** 24:9,11  
**interject** 95:21  
**internally** 88:13  
**international** 13:15  
**Internationally** 16:8  
**interrupt** 6:1  
**interview** 34:10,17,19  
 34:19 35:4 38:4 44:8  
 49:16,23 53:19 54:14  
 71:14 77:6,21 78:9  
 78:20,24 79:6,10,15  
 79:18 80:19,20 82:20  
 83:7 86:7,15 87:3,6  
 88:11,16 90:16,18,21  
 92:23 93:1,10 96:22  
**interviewed** 32:17,20  
**interviewer** 39:25 73:7  
**interviewers** 94:19

**interviewing** 74:7  
**interviews** 33:24 39:6  
 40:2,18 41:1 73:6  
 79:21 80:8,21 86:8  
 88:13,14 91:24 94:12  
 94:22 95:7,25 96:4,8  
**introduce** 96:8  
**introductions** 4:6  
**involved** 18:21 25:17  
 30:4,6 98:9  
**involvement** 26:17  
 29:9  
**in-between** 64:10  
**in-depth** 39:6  
**issue** 12:7 14:15 51:14  
 53:25 63:14 67:7  
 70:1 71:22 81:15  
 96:12  
**issues** 96:10,15  
**itinerary** 1:20 30:10  
 30:18 31:7 59:18,19  
 60:2 65:14

---

**J**


---

**J** 3:9  
**jail** 49:9  
**Jeff** 25:5,9,12 35:3,6  
**Jennifer** 46:11 47:11  
 48:18 90:3  
**job** 14:1 77:17  
**jobs** 13:13  
**Joe** 15:13  
**joined** 47:3  
**Journal** 39:3 80:3  
**judge** 8:15 11:7,16  
**Judicial** 1:1 4:4  
**Jules** 1:12,19,20,21 2:2  
 2:4,6,7,8,15 4:5,18  
 4:24 27:4 30:18  
 42:24 43:21 55:4  
 58:8 60:13 62:2 99:1  
 100:16,21  
**Julie** 41:18  
**jumbled** 7:12,15  
**jump** 6:4,5  
**juniors** 15:21

---

**K**


---

**Kardashians** 39:7,24  
 40:1  
**Kathie** 33:12 89:13  
 97:5,8,17 99:11,18  
**Keagan** 36:23  
**keep** 9:2 91:10  
**keeps** 10:14  
**kept** 9:7 85:13  
**Kid** 15:11  
**kids** 15:20  
**kind** 4:24 5:5 6:2,25  
 7:7,14 17:23 19:25  
 22:19 23:2,12 26:8

29:25 35:1 38:18  
39:9 42:8 46:17  
47:24 48:7,11 55:3  
58:2 61:16 65:22  
66:23 68:6 80:15  
85:16 88:4  
**kinds** 13:13  
**knew** 22:8 43:5 50:20  
53:22 73:22,22 85:9  
85:12 95:22  
**know** 5:18,18,21 6:2,3  
6:3,23 7:2,4,8,13,23  
7:25 8:13 9:3 12:9  
14:7 15:4 21:6,8,20  
22:23,24 23:1,10  
24:21 28:4,6 29:17  
31:20,22 33:8,8 34:5  
34:6 35:18 37:14,15  
39:16,20 41:19,24  
42:6 43:8 45:1,2  
46:20,21,22,23,25  
47:9,15,16,17,18,20  
48:2,13,15,19 49:19  
49:25 50:7,7,12,20  
50:21 51:23 53:8,21  
56:15,19 59:16 61:21  
63:5,10 65:3,25  
66:11,12,16,25 67:11  
67:22 68:8,10,25  
70:2 71:17 72:3,9,10  
73:5 74:7 75:2,3,16  
75:23 76:13 77:22,22  
77:25 78:10,15 79:5  
79:9 81:6 83:18,22  
84:16,23,24 85:10,17  
85:17,21 86:3,14,15  
87:9,9,11,24,24 88:5  
90:4 92:16 94:2  
96:18 99:19,22,25  
100:1  
**knowing** 64:3  
**knowledge** 98:9  
**known** 1:4 16:12 17:7  
17:25 54:2,14  
**knows** 17:3 61:21  
**Koch** 3:10 4:8,11  
**Kurt** 25:5,9,12

---

**L**


---

**label** 1:19,20,21 2:2,3  
2:4,5,7,8,9,10 27:4  
30:18 42:24 43:21  
52:14 55:4,7 58:9,18  
60:13 62:2 70:20  
72:9  
**labeled** 45:16 52:17  
**labels** 13:15  
**Labor** 27:21  
**lady** 16:24  
**laid** 76:1  
**large** 33:17 36:10

**late** 68:25 92:16 98:25  
**laugh** 87:12  
**law** 2:16 3:4,10  
**lawsuit** 89:17  
**lawyer** 47:4  
**LCR** 101:19,24  
**Lead** 34:10,11  
**leadership** 18:2,3,4  
**leading** 25:3 71:17  
**leak** 50:22  
**learn** 78:5  
**learned** 59:14 78:2,3  
**learning** 18:6 52:13  
**leave** 19:20  
**Lee** 33:12 39:6 89:13  
97:5,8,17 99:11,19  
**left** 16:20 19:15,18,18  
19:19,20,21,21 32:11  
68:9  
**legalese** 8:14  
**lengthy** 48:9  
**letting** 34:5 73:5  
**let's** 6:6 46:9 47:18  
85:19  
**level** 75:9 84:18  
**LEVIN** 46:7,15 47:2,7  
47:13 48:11  
**Levine** 3:10 4:7,10  
**liability** 49:7  
**licensed** 101:4,17,18  
**lie** 87:10  
**Lieberman** 15:13  
**life** 5:24 84:18 97:9,15  
99:20  
**light** 14:2  
**liked** 37:6 44:24 65:11  
65:25  
**likes** 5:10 33:6  
**Linda** 46:10,18,23  
**Lindsey** 19:12,13,14  
19:21 43:13

**line** 14:19 43:16 55:25  
71:16  
**lines** 20:25 21:3,15  
**link** 39:23,24 43:17  
44:13,14 45:7 56:4  
**linked** 56:9  
**links** 39:8,25 71:14  
**list** 32:16  
**listen** 87:20 88:12  
**listens** 33:6  
**litigation** 8:18 45:18  
**little** 4:25 5:19,24 6:8  
6:24 7:14 10:7 22:15  
23:6 34:6 48:1 62:9  
63:24 87:10 92:7,7  
93:11 99:24  
**live** 12:18,19 18:16  
20:11 22:22 33:9  
34:20,21 35:4,25  
36:15,17,23 45:17

46:5 64:4 67:14 75:3  
79:1,3 93:10 94:18  
**lives** 19:9  
**LLC** 1:8 3:9 4:9,11  
**LLP** 2:17 3:10  
**local** 25:19  
**location** 4:2  
**lock** 26:11  
**locked** 29:4 30:11  
**logistics** 42:5  
**logo** 73:8  
**long** 6:22 7:21 13:1  
16:12,17,18 19:11  
47:13 64:3 76:3  
**longer** 19:15 38:19  
91:10  
**look** 8:19,25 30:22  
39:9 60:17 78:10  
**looked** 53:12 60:2  
**looking** 49:22 56:19,20  
70:9  
**looks** 44:22 47:25 48:3  
61:5 73:4  
**Lord** 61:21  
**lot** 6:1,23 12:13 14:18  
15:4,13 17:21 20:25  
21:23 22:4,4,21  
24:11 33:4 34:7,7  
38:20 49:6 52:7  
53:19 54:19 57:14  
71:23 73:12 90:5,22  
96:2  
**love** 33:2 41:22 42:1,1  
46:23  
**low** 84:22 85:18 87:18  
**lower** 73:8  
**lunch** 34:16,19 91:3  
**lunch-screen** 34:17  
**L.A.** 19:9

---

**M**


---

**main** 25:7 54:8  
**maintained** 98:6  
**major** 25:7 39:3  
**making** 73:7 95:17  
**man** 87:8,10,12,13,15  
87:18,19,20 88:8  
**manager** 21:11,13,25  
**mania** 23:13  
**Marc** 34:22 35:2,4,5  
**March** 1:21 2:2,3  
16:20 42:24 43:15,21  
44:7 45:5,17 46:5  
49:15 50:19 51:14,15  
51:19 52:5,14,21  
56:2  
**Mardi** 56:14  
**mark** 8:16,19,25 9:3  
11:20 23:14 27:3  
30:17 42:21 43:19  
52:10,12 54:22,23,23

54:25 55:2 58:6  
60:12 61:25 70:14,24  
81:19  
**marked** 9:18 10:6  
11:22 27:5 30:19  
42:25 43:22 45:14  
52:14 55:5,7 58:9  
60:14 62:3 70:20  
74:6 81:20 82:8  
**market** 3:11 49:5  
**marketing** 12:24 13:2  
13:9 18:21,25 72:8  
**markets** 29:18  
**married** 46:22  
**Marvel** 33:19,20  
**Mash** 38:1  
**matter** 11:20 62:17  
**MCA** 13:16  
**McCall** 3:15  
**McEntire** 15:11  
**McGraw** 15:11  
**mean** 18:11 20:18 21:1  
23:1 24:12 26:15  
34:1 35:9 36:7,8  
37:21 41:21 44:11  
47:19 50:20,21 53:5  
54:5 58:20 59:24  
61:10,21 62:7 63:1,2  
66:19 72:4 73:4 75:9  
75:10,25 78:13 81:24  
86:16 87:9 90:12  
92:9 96:2  
**means** 27:22 28:18  
37:22 38:3,6,11,12  
61:21 72:1  
**meant** 7:2 44:21 49:25  
50:21 73:9  
**mechanically** 14:14  
**media** 1:7,8 3:9 4:9,11  
13:9 14:15,17,17,24  
15:2 18:15 20:10  
22:15,23 23:3,9,9,11  
23:15,20,23 24:9,11  
24:23 25:3,23,24,25  
26:2,4 28:20 29:12  
29:15 30:1,12,13  
32:3,5,14,17 33:22  
40:6,7,12,13 41:3,17  
41:22 51:7,14 60:8  
61:6,8,14 63:19,20  
64:8,21 66:4,24 69:5  
69:13,18 72:14,16  
73:15 77:20 78:8  
79:7,8,19 81:12,15  
88:4,25,25 89:5,20  
91:14,18,20 92:4,5  
92:13 95:10  
**medications** 8:4  
**meet** 48:19  
**meeting** 69:10  
**memory** 12:10 54:10

**mention** 8:12 10:3  
**mentioned** 16:21,23  
18:8 19:23 24:22  
26:24 31:12 40:5  
59:11 60:1 67:5  
92:13 96:4 97:4  
98:19  
**mentions** 33:25  
**met** 46:11 48:19  
**Michael** 3:9  
**mid** 59:25  
**middle** 10:10,12  
**Mike** 4:7 7:4,18 47:23  
47:24  
**miles** 12:21  
**million** 15:6  
**mind** 15:8 24:3 46:14  
84:1  
**mine** 69:9 84:23  
**minute** 74:22 82:4  
86:25  
**minutes** 53:12,16  
64:14,22 74:20,21  
83:12,12 86:24 87:5  
**mixed** 42:23  
**moment** 89:14 97:6,6,9  
99:11  
**monitor** 51:22  
**monitoring** 51:13 52:1  
**month** 26:22  
**months** 16:18 19:22  
46:11 48:24  
**Morgan** 36:2,10 78:18  
**Morgan/CNN** 35:24  
**morning** 2:10 33:9  
36:23 37:3,3 38:1  
43:16 71:14 73:17,18  
80:8 81:18,20 82:9  
82:20 86:23  
**move** 73:24  
**movie** 10:10 56:22  
**mumble** 7:12  
**music** 15:12,12 17:5  
17:24 18:2,3 37:11  
**mystery** 56:23

---

**N**


---

**N** 1:14 3:1,5  
**Najob** 98:21  
**name** 19:14 31:15 40:7  
40:13 48:22 51:22  
80:24 98:21 101:20  
**names** 20:6 25:10  
48:15,19 57:15  
**Nashville** 1:24 2:18 4:3  
12:20,21 13:4  
**national** 17:2,3 24:12  
25:7,18,19,22,24  
33:17 36:10 40:13  
**nationally** 16:7  
**natural** 6:3

**nature** 79:21 86:8  
**near** 12:20  
**need** 6:9 61:7 62:18,25  
 68:18  
**needed** 22:25 44:25  
**needing** 17:2  
**negative** 5:21 39:21  
 52:19 68:24 90:19  
**negotiate** 26:13 64:7  
**negotiated** 68:17  
**never** 22:24 78:20 86:4  
 96:12  
**new** 22:16 24:23 25:23  
 29:4,25 32:2,7,13  
 33:25 34:4 35:2  
 51:11 64:20,25 87:25  
 92:1 94:7,23 95:7  
**news** 24:12 42:9 67:14  
 92:23 99:5  
**newspapers** 39:4  
**Nick** 3:10 4:9,11  
**night** 49:1 68:13,22,23  
 85:23,25  
**nine-month** 18:5  
**nodding** 5:21  
**nods** 19:7 43:18 60:10  
 63:3 77:8 97:22  
**noon** 37:25  
**normally** 33:22  
**north** 12:21  
**Notary** 101:5,25  
**note** 34:6  
**notes** 67:6,6,9  
**notice** 2:22 37:24 49:6  
 49:10  
**noticed** 83:6  
**number** 10:7,8 47:21  
 47:21 82:10 101:19  
**numbered** 10:10  
**numbers** 38:9

---

**O**


---

**oath** 101:8  
**object** 11:4 96:1  
**objection** 11:5,15  
 24:10 40:9,16 54:1,4  
 54:7,8,9,12,18 77:3  
 86:10 88:18 91:15  
 96:11,17  
**objections** 2:24 11:12  
**objective** 13:24 14:1  
**objectives** 79:7  
**obvious** 45:1 53:8 65:4  
 71:5 99:3  
**obviously** 22:5 27:23  
 43:5 45:4 46:16  
 49:18 53:5,22 54:3  
 55:20 74:17 89:9  
 99:5  
**occasionally** 7:13 11:4  
**occurred** 79:16,22

86:8  
**October** 1:20 2:6,7,9,9  
 26:3,6 29:1 30:18  
 32:11,13 41:16,16,21  
 43:10 47:11 51:8,10  
 57:16 58:1,4,9,23  
 60:4,13 61:3 62:2  
 64:19,20,25 69:1,2  
 70:20 74:4,24 78:14  
 80:1 82:21 94:10  
**offered** 85:8  
**offering** 85:3  
**office** 21:2,3,18 78:7  
**Officer** 59:8  
**offices** 2:16  
**official** 44:25 50:10  
 101:22  
**oh** 6:10 7:1 15:3 16:13  
 25:11 42:14 70:16,19  
 72:4 76:12 78:15  
 80:10,13 85:11 87:12  
 87:13,15 97:24  
**okay** 5:5,22 7:24 8:11  
 8:21 10:2,15 11:10  
 11:14,18 12:6 16:19  
 18:11 20:3 26:24  
 28:12 30:16 31:1,14  
 32:12 38:5 43:7,11  
 44:5,10,13,20 45:11  
 45:13,19,22,25 46:9  
 47:2 52:24 53:4,7  
 55:12,14,17,21 56:12  
 58:6,21,25 59:23  
 60:7 61:2,14,19  
 62:11,19 65:18 71:1  
 72:7 74:2 78:15  
 81:18 83:5,7,19  
 84:13 85:11 87:4  
 98:13 99:2 100:7  
**old** 48:1 85:21  
**older** 35:10  
**once** 23:10,14 30:11  
**ones** 23:16 39:8 65:24  
 71:5 89:11  
**ongoing** 81:24  
**on-line** 34:19  
**on-screen** 17:14  
**open** 37:25 73:23 97:9  
**opened** 43:8  
**Operating** 59:8  
**opinion** 77:14 94:17  
**opportunities** 18:17  
 22:17 23:2  
**opportunity** 5:10 8:19  
 8:25 9:25 10:23  
 22:13 64:20  
**opposed** 76:2  
**op-ed** 35:1  
**orally** 5:20  
**order** 8:14 9:9 71:6  
**ordered** 8:15

**original** 11:22 27:5  
 30:19 42:25 43:22  
 52:15 55:5,8 58:10  
 60:14 62:3 70:21  
 81:21  
**originally** 88:3  
**Orlando** 22:20  
**ought** 64:25 65:2  
**outcome** 101:15  
**outlet** 40:13  
**outlets** 23:23 24:3 89:3  
**Outlining** 32:7  
**outside** 89:4  
**overly** 75:5  
**owned** 17:11  
**owns** 16:24  
**o'clock** 35:15 39:15  
 59:17 87:25 92:14

---

**P**


---

**P** 3:1,1  
**PA** 3:12  
**pad** 6:8  
**page** 1:14,18 2:1 33:19  
 35:11 36:22 56:19  
**pair** 65:10  
**paper** 6:13,18 71:22  
 72:5  
**papers** 10:5  
**paraphrasing** 67:19  
**Pardon** 71:1  
**part** 9:3 19:2 20:18  
 33:3 44:18 46:10  
 47:24 88:10  
**particular** 23:23 24:8  
 24:18 29:24 41:11  
 42:4 65:15,19 83:7  
 90:11  
**partied** 85:9,12  
**parties** 8:15,16 101:14  
**partner** 53:6  
**part-time** 19:25  
**passed** 33:7  
**passing** 53:20 93:24  
**Paul** 3:9 4:10  
**paying** 42:13  
**pay-per-view** 29:19  
 41:13,24 66:10,21  
 87:21 88:20  
**Pease** 19:14  
**pen** 6:15,18  
**pencil** 6:8  
**people** 15:5,9,13 18:7  
 19:3 22:8,9 24:16  
 29:21 48:20 49:7  
 77:18,23 78:4 84:22  
 89:4 93:13,20  
**people's** 48:19  
**performance** 76:8  
**period** 9:8 51:15 52:5  
 64:1 91:25

**permission** 98:7  
**person** 59:21 86:1  
 98:19  
**personal** 84:18  
**personality** 24:15  
 91:13 92:2,3,6  
**personally** 65:3  
**perspective** 53:24  
 77:11  
**Philadelphia** 3:12 4:8  
**Phoenix** 71:19,22 72:5  
**phone** 47:3 71:2 90:4  
 99:25  
**phoners** 22:23  
**phonetic** 5:18 98:21  
**Ph.D** 18:6  
**pick** 22:24  
**picture** 49:2 56:13,15  
**piece** 43:14  
**Piers** 35:24 36:2,10  
 78:18  
**Pinellas** 1:1 4:4  
**pipes** 76:2  
**pitch** 26:10 29:15  
 40:18,20,24 41:16  
**pitched** 40:17  
**pitching** 29:14 30:1  
 66:24  
**pivot** 68:6  
**place** 78:9 87:21 94:23  
 101:7  
**places** 32:8  
**Plaintiff** 1:5 3:3  
**plan** 33:10  
**planned** 25:1 92:13  
**planning** 23:3  
**plans** 13:20  
**play** 49:13 74:1,8  
 76:20 83:11 84:6  
 86:5,22 88:9  
**played** 9:10,13,18 46:5  
 74:5,24 93:11 96:20  
 99:20  
**playing** 17:16 21:24  
 83:14 87:7  
**Plaza** 2:17  
**please** 4:6,16  
**point** 6:21 7:21 29:3  
 33:3 50:17,25 60:7  
 63:22 64:2,10,12,17  
 64:24 76:24 77:2  
 89:16 93:18  
**pointed** 39:23 71:4  
**points** 65:13 66:6,7,11  
 66:13,14,21  
**polite** 75:12  
**pompous** 75:2  
**pop** 37:5  
**popular** 13:23,23  
**porn** 74:18  
**possible** 94:18

**Post** 26:14 34:20,21  
**posted** 58:3 59:15  
 89:18  
**posting** 43:17 51:8  
**PR** 13:14 15:9 16:16  
 17:24 18:15,21,25  
 19:3 20:7 22:6,12,13  
 53:24 63:5 64:3  
**pray** 84:22  
**prefer** 46:16  
**prepare** 64:6  
**prepared** 65:3,5 66:6  
**preparing** 94:22  
**prepping** 66:17  
**present** 17:21  
**preserve** 11:6  
**president** 17:11 59:9  
**press** 14:15,17 18:16  
 20:11 25:19 26:12  
 92:1 94:7  
**pretty** 25:14 27:20  
 33:13 40:25 48:23  
 63:5 66:18 69:7  
 73:23 90:6 92:3  
**previously** 20:9 45:14  
**print** 26:13 34:18  
 56:20  
**prints** 71:5  
**prior** 13:12 17:18,21  
 19:10 30:12 33:4  
 51:8,15  
**private** 15:4 99:20  
**pro** 39:11  
**probably** 8:12 12:7  
 14:18 26:5,19,20,22  
 27:21,22 28:2,3  
 40:11 53:20 56:2,3  
 64:1,12,13 71:15,18  
 71:19 72:5 73:21  
 74:11 75:3  
**Procedure** 2:21  
**proceedings** 101:6,9  
 101:10,11,16  
**process** 9:17,19 10:17  
 30:4  
**produced** 27:19 82:5  
**producer** 95:12  
**producers** 37:8 66:18  
 68:15,16 95:12  
**produces** 16:4  
**professional** 15:25  
 63:5 67:13  
**professionally** 1:4  
**professor** 15:15 34:22  
**profile** 22:5  
**program** 18:4,6 37:17  
 37:18  
**programs** 33:1  
**project** 13:21  
**promote** 13:21 15:5  
 20:12 36:7,9 41:2

87:24 88:1  
**promoted** 20:15 67:1  
**promoting** 14:22 36:8  
 41:11,12 65:24  
**prompted** 56:23  
**proper** 64:7  
**properly** 64:9,11  
**prosecute** 93:13,20  
 94:2  
**prosecuted** 49:12  
**Protective** 8:14 9:9  
**provide** 65:20  
**provisions** 2:20  
**public** 12:22,24 13:1  
 13:13,17 18:10 97:4  
 97:10 99:20 101:5,25  
**publicist** 68:17 80:22  
 95:11  
**publicity** 24:19  
**published** 56:22  
**pull** 99:6  
**purpose** 11:16  
**purposes** 8:18 27:17  
 43:11 45:16,17 58:21  
**Purse** 27:14  
**pursuant** 2:16,20  
**put** 18:11 47:18 49:2,5  
 66:7 71:16 73:8  
**puts** 16:1  
**P-e-a-s-e** 19:15  
**P.A** 3:4  
**P.M** 44:7 58:23 100:16  
**P.O** 1:24

---

**Q**


---

**question** 2:24 6:6  
 10:13 11:6,9 13:19  
 44:1 47:14 63:12,20  
 64:15  
**questioning** 61:19  
 72:12,13  
**questions** 5:9,11,12,20  
 7:10,14 8:3 9:16  
 10:17,20,23,24,24,25  
 11:4 30:25 91:9 94:9  
 94:19,21 98:12 100:6  
**quick** 52:13 57:18  
 90:24  
**quietly** 7:13  
**QUIVERS** 75:12 76:1  
 76:5  
**quoting** 50:4

---

**R**


---

**R** 3:1  
**radio** 36:16,20  
**ran** 17:13 59:7  
**reach** 29:20 37:15  
 38:25  
**reaction** 68:11 76:16  
 77:5,7,9 88:15

**read** 12:8,15 39:4 43:8  
 50:7 52:21 61:20,20  
**reading** 2:23 44:11  
**real** 31:15  
**reality** 21:17,23 37:17  
 37:18 49:10  
**really** 14:6,8,12 16:14  
 21:9 28:13 29:16  
 30:15 41:22 46:11,13  
 51:12 53:3 56:15  
 60:25 61:6,16 73:10  
 75:2,20 76:6,14  
 81:10 97:20 99:2,3  
 99:17  
**reason** 7:17 8:8 36:6  
 48:2 64:6 92:21 99:3  
**Reba** 15:11  
**rec** 53:7  
**recall** 24:23 26:17  
 28:10 30:15 42:8  
 50:15,18,24 51:3,4,4  
 51:6,13,19 52:4,7  
 54:6,16 56:16 58:2  
 58:25 61:9,18,23  
 70:4 73:16 77:5,20  
 78:8,23 79:23 80:19  
 80:20,21 81:13 86:11  
 88:10,13,15,24,25  
 89:2,5,11,15 90:7,10  
 90:18 91:14,16 92:15  
 92:16,17 93:9,14,15  
 93:18 94:6,13,24  
 96:23,24,25 98:23  
 99:16,17

**received** 12:4 31:20  
**receiving** 28:10 58:25  
**recess** 57:22 91:3  
**recognize** 31:2 44:2,3  
 55:18,19 58:13 60:19  
 62:6 71:8,10  
**recollection** 28:7 45:12  
 45:24 49:17 51:9  
 53:1,10,15,23 57:3  
 70:10 80:4 86:7  
 90:20  
**record** 5:16 11:6 13:15  
 44:5 45:16 49:20  
 57:20,23 82:3,8,12  
 82:14,16,17 91:1,4  
 100:10  
**recorded** 5:15 36:17  
 98:6  
**Records** 13:16  
**record's** 43:11 58:21  
**REEXAMINATION**  
 1:16 98:16  
**referred** 21:11 96:7  
**referring** 72:18  
**reflected** 72:21  
**refresh** 52:25 53:7,10  
 53:15,23 57:2 86:7

**refreshes** 28:7 45:10  
 45:11,23  
**regarding** 35:2 66:19  
**regret** 75:3  
**related** 67:6 101:13  
**relations** 12:23,24 13:1  
 13:13,17 18:10  
**relationship** 14:7  
 37:18  
**relationships** 23:24,25  
 24:5 29:16 41:7  
**release** 47:22  
**releases** 14:15,17  
**releasing** 98:10  
**remember** 6:25 7:7 8:5  
 20:5 34:14 43:3,6,9  
 44:11,18,21 45:5  
 46:2 48:18,22 49:14  
 49:15,16,21 50:14,23  
 51:12 53:18,19 55:16  
 56:12,13,14,24 58:14  
 59:5,10,17,17,22,25  
 60:20 65:23 66:16  
 67:19 74:11 76:17  
 78:6,19 79:2,3,4,17  
 80:2,24 93:13 98:25  
 99:18  
**remembered** 7:5  
**remembering** 48:14  
**repeat** 40:10 67:25  
 68:2  
**report** 51:7,15  
**reported** 101:6,9  
**reporter** 4:15 101:4,19  
**REPORTER'S** 101:1  
**Reporting** 101:18  
**reports** 34:12 42:9  
**represent** 81:23  
**representing** 4:8,11  
 54:15  
**reserved** 2:25 11:13  
 92:8  
**reset** 68:2  
**respect** 91:12 97:4  
**respond** 31:23 56:10  
**responded** 43:25 61:4  
 61:5,5,14  
**responding** 62:12  
 72:11  
**response** 53:11 56:11  
 86:17  
**responses** 62:9  
**responsibilities** 18:13  
**responsible** 93:13,20  
**restroom** 7:22 97:25  
 99:23,24 100:1  
**reverse** 71:6  
**review** 9:22,25  
**revised** 60:2  
**Rich** 15:12  
**right** 6:4 8:2 9:11

10:22 12:1,23 14:23  
 16:7 19:21 20:20,21  
 21:14,15,16,19 22:11  
 27:22 28:5,20 29:6  
 32:2,18 33:13 34:14  
 34:15 40:8 42:12,21  
 44:8 45:3 50:9 51:11  
 52:9,25 54:11 55:1  
 55:23 57:13 58:1,23  
 60:9 61:9 64:15  
 69:23 70:18,19 71:7  
 71:12 73:3 74:18  
 75:3,5 80:1,10,10,10  
 80:15 83:3,24 84:4  
 87:5,17,22 94:16,19  
 95:4,18,23 96:5  
**ring** 48:11 89:12  
**road** 18:16 22:21  
 44:18 72:6  
**Roberts** 38:1  
**Robin** 75:12,13 76:1,5  
**Rock** 15:11  
**role** 17:9,10,14 18:24  
 20:7,23 21:1,12,25  
 26:2  
**room** 68:10,12 69:9,22  
 74:18 75:17  
**roughly** 28:8 74:20  
 86:24  
**Roundabout** 2:17  
**rounds** 37:20,22 38:3  
**Rules** 2:20  
**run** 18:15 30:7 34:12  
 39:7  
**running** 17:12 48:23  
**runs** 74:10,20  
**Ryder** 1:19 27:4,25  
 28:1

---

**S**


---

**S** 1:17,23 2:1 3:1 101:4  
 101:24  
**Safier** 3:9 4:10,10 6:13  
 6:15 82:2  
**SAITH** 100:13  
**sake** 31:15  
**Sam** 38:1  
**San** 34:3  
**sat** 48:18 64:13  
**Saturday** 87:22  
**saw** 43:10 45:5 51:10  
 58:17 78:20 87:9  
**saying** 5:20 6:5 11:15  
 22:11 28:4 32:16  
 49:25 50:3,5,9,11,12  
 54:9 61:1,11 62:20  
 72:24 73:12 75:22  
 76:7,10,11,13,13  
 85:14 91:16 93:9,25  
 94:6 95:14 96:25  
 99:19

**says** 32:2 33:19 35:24  
 36:15 37:20,24 38:10  
 56:21 59:3 62:16  
 71:25  
**schedule** 33:10 37:24  
 42:6 60:3  
**scheduled** 32:8,9,20  
**Schulz** 3:10 4:8,11  
**scissors** 65:10  
**screen** 96:7  
**screwed** 84:19  
**se** 80:20  
**seal** 101:22  
**Sean** 35:12 92:14,22  
 99:3  
**seat** 8:1  
**second** 5:24 21:15  
 52:21 56:19 71:25  
 78:11 79:25 82:13  
 83:12  
**seconds** 24:22 74:21  
 74:22 83:13 86:24  
**secret** 65:5  
**secretly** 98:6  
**secure** 14:15  
**security** 31:13 48:6  
 59:20  
**see** 9:9 27:15 34:23  
 39:8,8 44:14 45:4,9  
 45:21,23 56:1,8  
 68:23 73:5 81:1 86:2  
 87:10  
**seeing** 43:3,6 49:14,18  
 52:25 53:11,14,18  
 55:16 56:12,14,16  
 57:2 86:6 93:14  
**seen** 7:11 21:10 47:24  
 48:1,8,9 49:22 52:18  
 53:22 98:2  
**segments** 71:24  
**selected** 18:4  
**selecting** 29:14  
**semester** 15:16  
**send** 9:8 23:17 30:10  
 31:5,7,17  
**sending** 60:1  
**senior** 13:15  
**sense** 9:4 42:7 52:1  
 62:9  
**sent** 31:9 32:11 39:25  
 43:15 44:7,15,23  
 45:7 49:19 52:21,24  
 53:5,6 55:23 56:3,3  
 58:18,22 59:2,3,4,12  
 59:18,18,19 60:3,4,5  
 61:2,3,4 62:12 64:1  
 71:13 73:8  
**sentence** 56:21  
**September** 1:19 16:13  
 16:16 27:4 28:1  
 47:10,11

**series** 5:8 92:1  
**served** 11:25  
**service** 69:14  
**set** 18:15,16 20:9 22:20  
 22:24 23:17,17 26:4  
 26:10,15,16 29:10  
 60:8 77:24 79:4  
 85:25 97:7 101:7  
**setting** 23:15 26:5,7,21  
**seven** 48:20  
**sex** 42:9 43:16 46:16  
 47:19 50:16,25 51:7  
 51:14 52:5 53:2,25  
 56:25 58:3,17 62:22  
 63:14 67:6 70:1 73:2  
 77:2 79:13 80:5  
 81:12,15 85:15 89:19  
 89:19 90:9 92:9,21  
 94:12 95:18 97:2,14  
 99:4  
**sexcapades** 50:8  
**Shade** 37:25 80:9,15  
**shakes** 39:21 68:24  
 90:19  
**Shane** 3:3 4:13 5:9  
 10:5,23 11:16 70:18  
**shared** 20:2  
**sheets** 57:7,8  
**Shelton** 15:13  
**shifting** 42:8  
**shirt** 23:1 83:2,8  
**shirts** 65:11,12,20,20  
 65:22 66:4  
**shock** 43:10 77:17  
**shocked** 46:20  
**shorthand** 101:10  
**shot** 47:8  
**show** 12:7 16:4,6 20:17  
 20:18,19,24 21:5  
 26:25 27:2 29:19,21  
 30:2,16 32:23 33:3,4  
 33:6,9,12,14,15  
 35:12 36:2,12,16,21  
 37:3,14,25 38:1,1,2  
 38:16,18,23,25 39:10  
 41:7 43:19 45:6,9  
 52:9 54:21 60:11  
 64:8 66:25 70:13  
 73:16,20 77:24 80:7  
 80:8,15 81:19 84:2,3  
 84:9 89:12 92:14,23  
 96:21  
**Showbiz** 38:14,19,22  
**showed** 59:22  
**showing** 10:4 27:18  
 40:2  
**shown** 37:9 51:25  
**shows** 16:2 22:22  
 24:16 32:12,17 33:11  
 37:2 38:7,20 41:4  
 48:5,6,7 64:4 66:18

80:13  
**show/live** 36:20  
**side** 69:21  
**sign** 9:22 89:4  
**signature** 100:20  
 101:22  
**signing** 2:23  
**simply** 40:3  
**sir** 8:7,10 12:2,5 13:5  
 14:3 18:20,23 20:14  
 20:22 21:18 22:14,18  
 23:5,21 24:25 30:5  
 31:3,16,19,21,25  
 32:19,22,24 36:4  
 39:22 40:21 42:11  
 55:19 57:4 58:24  
 69:3 72:20,23 79:17  
 79:20 86:21 88:23  
 92:11 94:14,25 97:3  
 98:4  
**Sirius** 37:24 38:8 80:8  
 80:21,22 81:1,3  
**Sirius/XM** 37:20  
**sites** 34:13 57:14  
**sitting** 70:9 88:24  
**situation** 35:22 64:2  
 75:4 76:11 84:21  
 92:8,9 96:22  
**six** 48:20  
**Sixth** 1:1 4:4  
**Skype** 35:4,8  
**sleep** 85:24  
**slot** 87:25  
**slow** 7:18  
**smart** 48:14  
**social** 71:15  
**somebody** 13:17 17:3  
 19:17 23:19 49:3  
**songs** 84:7  
**sophomores** 15:21  
**sorry** 25:13 40:11  
 42:20,22 58:20 63:11  
 63:11 70:16,24 82:7  
 82:9 97:24  
**sort** 10:12 11:19 76:2  
**sounded** 63:23  
**sounds** 49:3  
**sparks** 53:18,19  
**speak** 7:12  
**special** 41:13  
**specific** 28:19 29:12  
 73:15 89:5 90:20  
 92:12  
**specifically** 26:7 90:7  
**speculation** 56:23  
**speed** 12:10  
**spend** 49:9 68:20 69:2  
 69:4,11  
**spent** 81:3  
**spike** 16:10 71:24  
 87:25

**spoken** 95:2  
**Sponge** 33:2  
**sports** 34:11 38:2  
**spot** 18:11  
**spring** 42:10,16,17,20  
 57:25  
**square** 10:14  
**ss** 101:2  
**St** 3:5  
**stand** 24:3  
**standing** 99:12  
**standpoint** 33:9  
**stars** 74:18  
**start** 13:10 16:11  
 26:20  
**started** 10:10,13 17:4  
 19:11 26:5,5 48:25  
 68:14 71:13 73:18  
 78:4 90:23 95:6  
**starting** 10:12 13:12  
 34:4 62:8,9  
**starts** 34:1 86:23  
**state** 101:1,5  
**statement** 44:25 46:17  
 50:10 63:5 65:4,5  
 93:15 94:11,23,24  
 95:17  
**stay** 19:11 46:22  
**staying** 46:12  
**stenographic** 7:11  
**stenographically** 5:19  
 101:9  
**stenography** 5:18  
**step** 7:22 8:3  
**Stern** 24:4 32:21 33:2  
 33:4 62:17,23 73:16  
 73:22,24 74:3,6,24  
 75:7,10,14,18,21,25  
 76:4,7,12 77:6,13,16  
 83:10 85:21 95:21  
 96:21  
**Stern's** 74:15  
**stop** 7:17 71:25  
**stories** 85:13  
**story** 20:25 21:3,14  
 47:25 48:5 50:25  
 51:7 58:3 84:18  
**Strait** 15:10  
**strategic** 13:20  
**strategies** 20:10  
**strategy** 18:15  
**streamed** 80:13  
**Street** 2:18 3:11 4:2  
 39:3  
**string** 2:9 70:20 94:10  
**strong** 63:5  
**studio** 74:14,15  
**stuff** 8:5,16,20 12:13  
 12:16 21:10 23:4  
 31:17 48:4 57:15  
 68:6 85:15 88:4,4,6

**subject** 43:16 44:7  
 55:25  
**Subpoena** 1:18 8:23  
 11:22 12:1,3  
**substance** 9:6  
**suffered** 89:18  
**suggestion** 68:4  
**suggestions** 68:11  
**Suite** 2:18 3:5,11 4:3  
**Sullivan** 3:10 4:8,10  
**summer** 34:23  
**Sunday** 68:14 88:2  
**suntan** 87:11,16  
**Super** 88:2  
**supporters** 33:20  
**sure** 6:10,14 7:19  
 12:15 19:1 29:18  
 62:18,25 63:4,18  
 66:21 67:11 68:9,15  
 73:7 83:4 94:11 95:3  
**Sway** 2:10 80:8,18  
 81:18,20 82:9,20  
 83:14,19,22 84:1,4,6  
 84:9,13,20 85:1,5,11  
 86:22 87:7,8,14,16  
 87:20 88:7,15  
**swear** 4:16  
**sworn** 4:20 101:8

---

**T**


---

**T** 1:17 2:1  
**take** 7:21 12:8,9,12,15  
 14:8 22:11 23:1  
 30:22 40:5 52:21  
 57:10,17 65:8,10  
 82:2 90:24 94:23  
 96:15  
**taken** 2:16 5:17  
**talent** 22:4,10 25:15  
 27:23 51:23,24  
**talk** 4:25 6:23 7:6,10  
 7:10,13,13 22:10,15  
 37:3 41:23 44:22  
 50:2,9 62:17,24  
 67:24,24 68:3 73:14  
 79:15 81:14 82:1  
 88:4 95:17,19  
**talked** 10:8 28:2,16  
 37:4 59:3 62:13  
 64:16 70:11 92:24  
 94:12  
**talking** 6:24,25 7:1,5  
 11:12 17:4 34:22,24  
 50:16,19,22 65:13,14  
 66:6,7,11,13,14 79:1  
 79:9 80:23 85:1  
 88:20 97:9,15  
**talks** 37:13 40:23,24  
 62:25 63:19 96:2  
**Tampa** 3:5,5  
**tandem** 55:1

**tape** 42:9 43:16 46:16  
 47:8,19,24 48:9 49:4  
 50:16,25 51:7,14  
 52:6 53:2,25 56:25  
 58:3,17 59:15 62:22  
 63:14 67:6 70:1  
 71:21 73:2 77:2  
 79:13 80:5 81:12,15  
 89:19,19 90:9 92:10  
 92:21 94:12,16 95:3  
 95:10,18 97:2,14  
 99:4  
**tapings** 22:22  
**teach** 15:14,15,17  
**teaching** 15:16  
**team** 58:18  
**Teared** 97:12  
**tease** 21:8  
**Technician** 3:15 4:1,15  
 57:20,23 82:14,17  
 91:1,4 100:10  
**Telegraph** 56:17  
**television** 16:4,6 24:13  
 64:4 67:14 69:22  
 94:18  
**tell** 6:21 21:21 23:6  
 26:19 38:9 41:10  
 56:7 78:13 83:24  
 93:22 99:15  
**telling** 60:24 77:23  
**temporary** 20:1  
**tendency** 95:24  
**Tennessee** 2:18 4:3  
 12:19 101:1,5,18  
**Terra** 93:3 98:20,21  
**Terry** 1:3,20 4:14  
 30:18 31:10,11,14,18  
 40:20,24 53:6 60:3  
 93:25  
**test** 12:10  
**testified** 4:20 5:3 91:12  
**testify** 8:5,8 101:8  
**Thank** 47:6 52:12  
 75:13 82:11 84:11,15  
 98:14 100:8,9  
**thanks** 6:19 31:23  
**thereof** 101:7  
**thing** 5:24 6:5,21,24  
 7:1,20 8:11 9:6,21  
 10:3,6 41:11 42:18  
 45:2 46:23 47:4 48:9  
 49:11 50:1 64:7  
 67:16 68:3 75:3  
 78:25 85:19  
**things** 5:6 7:7,8,12  
 8:11 10:5,14 14:18  
 14:19 17:5 18:2  
 22:25 25:19 26:8,21  
 33:22 48:17 49:1  
 51:22 57:8 63:6  
 65:19 75:8 90:14

91:11 93:12 95:1  
96:3,21 98:18  
**think** 8:12,22 10:11  
11:9 16:16,20 17:10  
██████████ 1  
38:21 49:8 50:18  
51:9,16 52:18 53:5  
53:20 54:4,8 59:16  
63:22 64:11,21,25  
71:5,13 73:19 76:24  
77:10,11,12 78:6,11  
78:19 79:2 80:16  
85:7 90:1,5 91:11  
92:19 94:15 95:1  
99:25 100:3  
**third** 66:10 73:8  
**Thomas** 1:21 2:4,6  
19:9 31:11 42:24  
43:4,12 55:4,21 58:8  
58:22 62:14  
**thought** 17:5 42:20  
50:15 53:24 54:16  
63:23 65:2,6 84:12  
90:4  
**thoughts** 53:11,15  
72:21  
**three** 59:7 66:21  
**threesome** 85:2  
**thrown** 88:5  
**Thursday** 88:1  
**Tim** 15:11  
**time** 4:2 10:8 12:8,9,12  
12:15 16:12 20:2  
23:22 25:7 28:8  
30:22 33:10 36:10  
38:25 46:10 48:16  
49:9 51:12 52:5,23  
53:2 54:15 55:9  
56:24 57:17 59:25  
63:11,12 64:18,19  
65:8,15,25 66:10,20  
68:20 69:2,4 72:9,22  
74:8 77:6 78:18 81:3  
81:23 84:14 85:8  
87:25 91:25 92:17  
93:16,18 97:19 101:6  
**times** 6:1,22,23 14:23  
15:1,5 42:4,5 49:3  
81:2 94:3  
**timing** 33:8,9  
**title** 18:9 59:6 66:9  
**titled** 45:17  
**titles** 59:10  
**TMV** 79:18  
**TMZ** 24:4 44:8,23  
45:17 46:5 51:7  
53:11,16 74:4 77:21  
79:3,10 86:2,7,15  
90:16,18,21 93:10  
**tmz.com** 43:17 44:14  
**TN** 1:24

**TNA** 15:22,24 16:1,11  
17:1,9,15,19 18:8,14  
20:7,20,21 21:11  
22:2 23:13 27:19  
40:7 41:20 57:6,11  
58:19,20 65:20 66:12  
68:6 88:1 98:9  
**TNA's** 40:13  
**TNA-G0001** 1:21  
42:24  
**TNA-G0005** 2:2 43:21  
**TNA-G0006** 2:3 52:14  
52:18  
**TNA-G0008** 2:4 55:4  
**TNA-G0011** 1:19 27:4  
**TNA-G0014** 2:7 58:9  
**TNA-G0016** 2:8 60:13  
**TNA-G0017** 2:9 62:2  
**TNA-G0018-23** 1:20  
30:19  
**TNA-G0042-43** 2:10  
70:20  
**TNN** 83:8  
**today** 4:1 5:9 7:4 8:9  
9:2 11:25 32:23 33:8  
33:12,14 38:14,19,22  
88:24 89:12 91:11  
**toes** 77:19  
**told** 39:17 93:8  
**tonight** 38:21 99:2  
**top** 14:19,19 39:3 71:8  
**totally** 50:13 75:4  
96:22  
**tough** 67:21  
**tour** 18:16 20:11 22:16  
23:11,17 24:23 25:1  
25:3,8,18,20,22 26:2  
26:4,18,23 28:3,20  
29:6 30:2,12 31:6,6  
32:3,5 40:6,12 41:17  
60:8 61:6,8,15 64:21  
65:9,13,19 66:24  
68:14 69:5 77:20  
78:8 79:7,8,19 81:16  
88:25 89:20 92:1,2  
92:13 94:7 95:10  
**tours** 18:15 20:10  
**town** 87:24,24 88:1  
**training** 14:17  
**transcript** 5:13,23  
8:19,25 9:4,23,24  
101:11  
**travel** 27:24 28:17,18  
31:12  
**traveled** 64:19  
**trial** 9:10,13,17,18  
**tried** 49:1 70:2  
**tries** 77:18  
**true** 94:20 101:11  
**truth** 48:22 101:8  
**truthfully** 8:6,9

**try** 5:25 6:6 7:9,10  
26:11 29:18,20,20  
33:10 42:6 49:5 64:7  
95:24 96:16  
**trying** 29:17 48:14  
75:1,9,24 77:1  
**tune** 29:19,21  
**TURKEL** 3:4  
**turquoise** 65:23,25  
**TV** 16:10 21:13,14  
22:22 26:9,13 29:19  
35:12 36:15,19,20,21  
41:5 64:8 66:19 70:5  
78:15 80:10  
**Twenty** 13:3  
**two** 8:11 19:5,23 25:6  
25:14 28:23 32:7,13  
32:25 37:2 47:21  
52:24 69:1 71:24  
84:22,23 94:5  
**two-day** 26:12  
**type** 24:9  
**types** 40:2  
**typical** 31:17 66:13  
**Typically** 11:4  
**typing** 5:13,18 71:1  
**typos** 71:1  
**T-shirt** 82:23  
**T-shirts** 65:10

---

### U

---

**UFC** 39:7 40:1  
**uh-huh** 5:7,21 9:5  
12:14 18:1 27:1,20  
28:9,17,23 29:5  
30:24 32:14 34:21  
36:1,24 38:13,15,17  
43:14 45:8 49:24  
51:20 52:2 55:22  
56:6 59:13 60:18  
69:16 72:2 90:25  
**ultimate** 13:24 14:1  
**ultimately** 9:11 14:4  
**uncomfortable** 87:10  
**underneath** 56:20  
**understand** 6:5 7:16  
7:19 12:22 13:6 14:8  
15:14 16:1 47:17  
62:19 63:8 64:16  
71:3,10 75:21 76:17  
99:19  
**understanding** 24:18  
29:3 63:13,15  
**understood** 61:10  
**unfamiliar** 54:10  
**Universal** 13:16  
**unrealistic** 63:24 94:15  
**updated** 59:19 60:5  
**upended** 75:4 96:22  
**upset** 89:22,24 90:6,7  
90:15

**use** 20:12 25:15 39:24  
88:7  
**uses** 39:5  
**usually** 14:6 23:10  
26:9 31:5,23 93:24  
96:6

---

### V

---

**various** 10:5 32:17  
**VH1** 36:22 37:9,15,19  
**Vice** 59:9  
**vice-president** 16:15  
18:9,10  
**video** 2:10 3:15 4:1,15  
5:15,16,22 9:5,23  
39:2 45:6,9,23 46:5  
51:10 53:11,16 57:20  
57:23 80:11,12 81:20  
82:10,14,17,20 91:1  
91:4 93:10,14 98:6  
98:10 100:10  
**videos** 73:15  
**videotaped** 1:11 2:15  
100:16  
**videotapes** 39:6  
**views** 24:18 81:11  
**Vince** 15:11  
**Vogt** 1:15 3:3 4:13,13  
9:10 11:3 21:21  
24:10 28:13 40:9,16  
54:1,18,24 55:12,14  
70:15 77:3 82:5,11  
86:10 88:18 91:7,17  
96:3,14,19 99:15  
**voice** 4:6  
**vs** 1:6

---

### W

---

**wait** 42:15 47:21  
**waived** 2:24 100:20  
**walk** 47:7  
**Walking** 89:3  
**Wall** 39:3  
**WallStreetJournal.c...**  
39:2,4  
**Walters** 47:23,24  
**want** 6:11 7:8,21 8:17  
9:2 12:8,9 14:24 15:2  
15:██████████  
34:25 35:22 38:24  
39:17 44:22 47:2  
49:5 59:20 67:22  
73:14 74:1 75:2,5,14  
80:3 83:22,23 84:24  
84:24 85:14,14,15  
92:20,24 95:9,17,19  
99:4  
**wanted** 10:3 19:1 22:9  
39:9,10,20 62:10  
63:12 67:11 68:14  
87:14 94:11 95:3

100:3  
**wanting** 17:5 63:18  
**Warner** 13:16  
**wash** 37:23  
**wasn't** 35:6 42:13  
48:22 51:1,2,16  
61:17 64:12 69:21  
73:13 76:5 79:8  
84:17 89:10 94:16  
97:24  
**watch** 70:7  
**watched** 53:16  
**water** 7:23  
**way** 8:23 10:6,11  
24:14 40:12 54:13  
61:23 63:7 67:15  
68:1 71:5 76:8,14  
86:11,18 88:22 89:23  
**ways** 54:19  
**wear** 41:1 66:3  
**wearing** 83:8  
**web** 48:5  
**Weber** 72:3,8  
**website** 33:23 34:11  
44:14 56:21 89:19  
**Wednesday** 32:10,10  
36:14 59:19  
**week** 26:9 32:11 34:5  
41:22 61:7,15 67:21  
67:23 71:17,20 73:16  
**weekend** 27:22 48:19  
65:7  
**weigh** 11:16  
**weird** 10:7 57:14 85:7  
**welcome** 46:7 47:4  
**went** 16:13 33:12  
34:25 46:11,23,25  
73:20,21,24 74:7  
77:11 85:18 97:7,25  
99:23 100:1,2  
**weren't** 51:2  
**we'll** 5:15 7:6 11:4,5  
22:15 27:3 30:17  
43:19 45:9,20 52:10  
52:12 54:22 55:1  
60:12 70:14 74:8  
81:19,22 82:8 83:10  
**we're** 7:20,25 9:1  
10:11,12,13 11:6  
35:1 38:11 46:15  
49:11,11 57:23 61:7  
62:21 67:24 74:6  
76:25 79:12 82:14,17  
84:6,16 99:1,5  
100:10  
**we've** 10:7 61:6 71:3  
87:25 88:2  
**WHEREOF** 101:21  
**white** 66:2  
**wife** 85:4,5,8,13 90:2  
**wild** 48:23

<p><b>Wilson</b> 1:23 4:16 101:4,24</p> <p><b>window</b> 26:12 48:16</p> <p><b>wish</b> 54:2</p> <p><b>witness</b> 2:23 4:16 6:14 6:16,18,19 8:16 11:24 19:7 27:9,14 30:21 39:21 43:2,18</p> <hr/> <p>58:11 60:10,16 62:5 68:24 70:23 90:19 97:22 101:7,21</p> <p><b>woe</b> 83:16 84:17</p> <p><b>woman</b> 48:8 56:23</p> <p><b>wondering</b> 47:14</p> <p><b>word</b> 99:13</p> <p><b>words</b> 76:8 99:17</p> <p><b>work</b> 5:22 12:22,24 14:24 15:1,9 16:13 16:14,17 17:19,21,23 19:12 21:2 22:13,17 22:19,23 23:3,7 26:13 31:11 42:13,14 42:17 95:12</p> <p><b>worked</b> 13:1,14 15:22 19:6,10 22:3 23:22 25:5 43:4,5 51:17,17 77:10</p> <p><b>working</b> 14:4 16:6,11 17:1 19:3,18 22:12 24:8,17 48:4</p> <p><b>works</b> 10:6 13:9 19:15</p> <p><b>world</b> 22:6 37:5 39:4 57:9 75:4 96:23</p> <p><b>worried</b> 49:7,8</p> <p><b>Wortman</b> 1:12,19,20 1:21 2:2,4,6,7,8,15 4:5,18 12:18 13:9</p> <hr/> <p>43:12,21 55:4 58:8</p> <hr/> <p><b>wouldn't</b> 17:20 20:4 21:6 35:23 97:12 98:1</p> <p><b>wow</b> 87:18</p> <p><b>WRAP</b> 38:10</p> <p><b>wrestle</b> 21:5,9 23:13</p> <p><b>wrestled</b> 75:16</p> <p><b>wrestlemania</b> 41:20</p> <p><b>wrestler</b> 35:9,10</p> <p><b>wrestlers</b> 20:12,16 21:1 25:14</p> <p><b>wrestling</b> 15:25 16:1 21:7,9,21 33:5,7,21 33:22 34:24,25 35:2 37:7 38:1 39:11 41:2 57:8 66:1 82:23 83:2 88:2,4</p> <p><b>write</b> 6:11 67:9</p> <p><b>writers</b> 21:4</p> <p><b>writing</b> 12:10</p>	<p><b>written</b> 5:22 50:6 66:1</p> <p><b>wrong</b> 46:20</p> <p><b>wrote</b> 46:12 47:25 65:15 67:18</p> <hr/> <p style="text-align: center;"><b>X</b></p> <hr/> <p><b>X</b> 1:14,17 2:1</p> <p><b>XM</b> 37:22,24 38:3,8</p> <hr/> <p style="text-align: center;"><b>Y</b></p> <hr/> <p><b>yeah</b> 9:14 12:25 15:3 20:18 27:11 41:12 46:4,8 52:12 53:18 56:2 58:15 60:18 ██████████:18</p> <p>74:10,13 75:18 76:5 76:20,22 78:16,16 80:2 83:19 84:20,25 85:6 87:20,23 91:16</p> <p><b>year</b> 13:3 16:13 18:7 23:12 25:4 26:5 34:4 36:13 38:20 41:14 47:8,10,10</p> <p><b>years</b> 15:8,10 25:6 37:2 41:8 42:23 43:5 47:12,16,22,22 48:20 48:21 61:22 66:12 84:23</p> <p><b>yesterday</b> 85:22</p> <p><b>York</b> 22:16 24:23 25:23 29:4,25 32:3,7 32:13 33:25 34:4 35:2 51:11 64:20,25 92:1 94:7,23 95:7</p> <p><b>younger</b> 35:3,8,9 46:24</p> <p><b>y'all</b> 17:18,23,25 23:7 ██████████ 19 69:4,15,23</p> <hr/> <p><b>#208</b> 101:24</p> <hr/> <p style="text-align: center;"><b>1</b></p> <hr/> <p><b>1</b> 83:12</p> <p><b>1:12</b> 100:11,16</p> <p><b>1:43</b> 44:7</p> <p><b>10</b> 2:9 70:20 82:21</p> <p><b>10th</b> 29:1 32:14 66:9 69:2 80:1</p> <p><b>10/10</b> 34:1</p> <p><b>10/10/12</b> 2:11 81:20</p> <p><b>10/18/16</b> 101:25</p> <p><b>10:16</b> 2:19 4:2</p> <p><b>10:30</b> 68:25</p> <p><b>100</b> 3:5</p> <p><b>1001</b> 3:11</p> <p><b>11</b> 1:18 2:9 70:20 74:20</p> <p><b>11:00</b> 68:25</p> <p><b>11:30</b> 57:21,24</p>	<p><b>11:35</b> 37:24</p> <p><b>11:40</b> 57:24</p> <p><b>12</b> 74:21</p> <p><b>12:15</b> 82:15</p> <p><b>12:16</b> 82:18</p> <p><b>12:25</b> 91:2</p> <p><b>12:59</b> 91:5</p> <p><b>12012447-CI-011</b> 1:6</p> <hr/> <p><b>15</b> 64:14,22</p> <p><b>15-minute</b> 64:1</p> <p><b>150651</b> 1:24</p> <p><b>160</b> 2:17 4:2</p> <p><b>1760</b> 3:11</p> <p><b>18</b> 16:18</p> <p><b>19</b> 70:17</p> <p><b>1900</b> 3:5</p> <p><b>19103</b> 3:12</p> <p><b>1998</b> 13:11,12</p> <hr/> <p style="text-align: center;"><b>2</b></p> <hr/> <p><b>2-1/2</b> 61:22</p> <p><b>20</b> 12:21</p> <p><b>2011</b> 16:16 25:5 42:20</p> <p><b>2012</b> 1:19,20,21 2:2,3 2:4,6,8,9,9 22:16 24:23 25:6,16 26:3 27:4 30:18 42:10,16 42:17,24 43:15,21 44:7 45:17 46:5 51:8 51:15,15 52:14 55:4 57:16 58:1,1,4,9 60:13 62:2 70:20 74:4,24 82:21 92:2 94:7,10 95:10</p> <p><b>2013</b> 16:20 42:22</p> <p><b>2015</b> 1:12 4:1 100:16 101:22</p> <p><b>21</b> 42:22 70:15,19</p> <p><b>210</b> 1:18 10:11 11:21 11:22</p> <p><b>211</b> 1:19 27:3,5</p> <p><b>212</b> 1:20 30:17,19</p> <p><b>213</b> 1:21 42:22,25 43:12 44:16</p> <p><b>214</b> 2:2 43:20,22 44:6 49:22</p> <p><b>215</b> 2:3 52:11,12,15</p> <p><b>216</b> 2:4 54:22 55:2,5 55:11,17</p> <p><b>217</b> 2:5 55:2,7,13 56:7</p> <p><b>218</b> 2:6 58:6,9</p> <p><b>219</b> 2:7 60:12,14</p> <p><b>220</b> 2:8 62:1,3 70:14</p> <p><b>221</b> 2:9 70:21,24</p> <p><b>222</b> 2:10 81:19,20 82:9 82:19</p> <p><b>23</b> 86:24 87:5</p> <p><b>23416</b> 45:17</p> <p><b>23420-029</b> 82:10</p> <p><b>24295-96</b> 2:5 55:7</p>	<p><b>25</b> 18:7 41:8</p> <p><b>25th</b> 13:3</p> <p><b>26</b> 2:4 55:4</p> <p><b>26th</b> 55:23</p> <p><b>27</b> 1:19</p> <p><b>298-1992</b> 1:25</p> <hr/> <p style="text-align: center;"><b>3</b></p> <hr/> <p>5 59:17</p> <p><b>3:09</b> 58:23</p> <p><b>30</b> 1:20 9:22,23</p> <p><b>33602</b> 3:5</p> <p><b>37215</b> 1:24</p> <p><b>39</b> 74:22</p> <hr/> <p style="text-align: center;"><b>4</b></p> <hr/> <p><b>4</b> 1:15 2:6,7,9 35:15 58:9 60:13 62:2 74:21 92:14 94:10</p> <p><b>4th</b> 58:23 61:3 64:19</p> <p><b>4-1/2</b> 46:11</p> <p><b>42</b> 1:21</p> <p><b>43</b> 2:2 86:24</p> <p><b>45</b> 37:25 80:9,15</p> <p><b>46</b> 83:13</p> <hr/> <p style="text-align: center;"><b>5</b></p> <hr/> <p><b>5</b> 1:20 30:18 60:4 72:3 83:12</p> <p><b>52</b> 2:3</p> <p><b>55</b> 2:4,5</p> <p><b>58</b> 2:7</p> <hr/> <p style="text-align: center;"><b>6</b></p> <hr/> <p><b>6</b> 83:12</p> <p><b>6/30/2016</b> 101:24</p> <p><b>60</b> 2:8</p> <p><b>615</b> 1:25</p> <p><b>62</b> 2:9</p> <hr/> <p style="text-align: center;"><b>7</b></p> <hr/> <p><b>7</b> 1:12,19,21 4:1 27:4 42:24 43:15 45:17 46:5 100:16</p> <p><b>7th</b> 28:1 51:19 56:2</p> <p><b>70</b> 2:10</p> <p><b>700</b> 2:18</p> <hr/> <p style="text-align: center;"><b>8</b></p> <hr/> <p><b>8</b> 2:2,3 43:21 44:7 52:14 87:25</p> <p><b>8th</b> 32:13 50:19 52:21 64:20,25</p> <p><b>800</b> 4:3</p> <p><b>81</b> 2:11</p> <p><b>88</b> 45:15</p> <hr/> <p style="text-align: center;"><b>9</b></p> <hr/> <p><b>9</b> 74:4,24 78:14</p> <p><b>9th</b> 29:1 32:14 69:1</p>	<p>78:16 101:22</p> <p><b>9:54</b> 43:15</p> <p><b>91</b> 1:15</p> <p><b>94</b> 74:6 96:20</p> <p><b>98</b> 1:16</p>
--	---	--	--	--