

# EXHIBIT 16

to the

PUBLISHER DEFENDANTS' MOTION IN LIMINE ON EVIDENCE  
RELATING TO PLAINTIFF'S ADMISSION THAT HE BELIEVED  
THE SEX TAPE(S) SHOWED HIM MAKING STATEMENTS THAT  
HAVE BEEN MARKED AS CONFIDENTIAL

Collections - Hulk Hogan

# Dan Gross: Hulk Hogan said to have more sex tapes

Reality TV star and former pro wrestler Hulk Hogan, whose real name is Terry Bollea, looks on as his attorney David Houston speaks during a news conference Monday, Oct. 15, 2012 at the United States Courthouse.

Reality TV star and former pro wrestler Hulk Hogan, whose real name is Terry Bollea, looks on as his attorney David Houston speaks during a news conference Monday, Oct. 15, 2012 at the United States Courthouse in Tampa, Fla. Hogan says he was secretly taped six years ago having sex with the ex-wife of DJ Bubba "The Love Sponge" Clem. Portions of the video of Hogan and Heather Clem were posted on the online gossip site Gawker. (AP Photo/Chris O'Meara) (Chris O'Meara)

**By Dan Gross**

POSTED: October 18, 2012

Not only are there more **Hulk Hogan** sex tapes floating around, but the woman he was filmed having sex with also made X-rated videos with other men, say sources familiar with the videos.

On Monday, Hogan filed suit against his longtime best friend, radio host **Bubba "The Love Sponge" Clem**, his ex-wife **Heather Clem** and website Gawker, which posted a clip from one encounter between Hogan and Heather, taped in the formerly married couple's bedroom.

Hogan confirmed on the **Howard Stern** show on SiriusXM Satellite Radio that it was Heather Clem, now **Heather Cole**, a freelance writer and animal activist, in the videos and that he had sex with her on multiple occasions while she was married to Bubba. Hogan said Bubba encouraged him to have sex with his wife. Stern also said Bubba offered him sex with Heather.

Tuesday, we spoke with someone who has seen multiple videos of Hogan and Clem together, and says there are more videos of Heather with other "B and C list celebrities" that are coming out now.

**Another source says he saw footage on one of the surreptitious recordings of Hogan, all of which seem to have been taped in the Florida home of the Clems, using the N-word and making other derogatory remarks about black people.**

**TheDirty.com, which in April was the first to post about the Hogan sex videos and to identify Heather Cole, said Hogan went on a "racist rant" that included "N-bombs."**

Many have questioned whether Hogan was in on the recordings and distribution, which Bubba the Love Sponge now claims.

Our source, who heard the video with racist language, believes Hogan is not involved in any way as he wouldn't want that material getting out there. TheDirty.com's **Nik Richie** posted Tuesday a letter from one of Hogan's lawyers assuring him he would not be sued. Richie stated he could guarantee Hogan was not involved.

Hogan's attorney did not return requests for comment Tuesday about the alleged racial epithet video or the additional sexual escapades videos that haven't yet been posted online.

Heather Cole also failed to return our request for comment.

Cole on 'Life After Top Chef'

**Cole Hamels** and wife **Heidi Hamels** will be seen on Wednesday's "Life After Top Chef," (10 p.m., Bravo) cooking alongside Somerton native **Jennifer Carroll**. In April, Carroll, one of the former "Top Chef" contestants whose struggle to open a restaurant is covered on the series, cooked at a Hamels Foundation fundraiser. **Phillies Ryan Howard, Jonathan Papelbon** **Kyle Kendrick** and their now-former teammate **Shane Victorino** attended the event and should be seen in the episode.

Schoolly D getting surgery

Good luck to Philly hip-hop pioneer **Schoolly D**, who will have oral surgery Wednesday at Penn Dental to fix a tooth abscess.

Forum with film's Zemeckis

Film critic **Carrie Rickey**, who spent many years at the *Inquirer*, hosts a conversation with filmmaker **Robert Zemeckis** at 3:30 p.m. Oct. 27 at the Kimmel Center. The public interview, part of her *Close Encounters* series, takes place before the Philadelphia Film Festival's closing night screening of Zemeckis' new film "Flight," starring **Denzel Washington** as an airplane pilot who makes a heroic landing and then faces scrutiny and controversy.

Zemeckis' films include "Forrest Gump," "Back to the Future," "Who Framed Roger Rabbit?" and the hilarious, yet often overlooked "Used Cars," with **Kurt Russell** and **Jack Warden**.

A highlight reel of Zemeckis films will be shown before the conversation. Zemeckis will field questions from the audience afterward. Tickets are \$5 for students, \$10 for seniors or \$20 for general admission and are available at kimmelcenter.org.



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Tom Joyner show at Temple

Comedian **J. Anthony Brown**, who's seen on TV One's new sitcom "The **Rickey Smiley Show**," and the rest of the **Tom Joyner Morning Show** will be at Temple's Liacouras Center Friday and Saturday hosting the Take A Loved One to the Doctor health festival. For more info, or a schedule of events, visit [mbphilly.com](http://mbphilly.com).

Contact Dan Gross at [grossd@phillynews.com](mailto:grossd@phillynews.com) or 215-854-5963. Follow him on Twitter @PhillyGossip or at Facebook.com/dangrossphillygossip. Read his blog at [PhillyGossip.com](http://PhillyGossip.com), or for his latest columns see [philly.com/dangross](http://philly.com/dangross).

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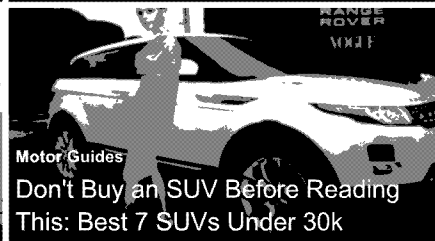
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