

Exhibit 1

UNITED STATES DISTRICT COURT

DISTRICT OF CONNECTICUT

-----x
RUSS McCULLOUGH, et al., No. 3:15-cv-01074 (VLB)
Lead Case
Plaintiffs,

-v-

WORLD WRESTLING
ENTERTAINMENT, INC.,

Defendant.

-----x
EVAN SINGLETON and VITO No. 3:15-cv-00425 (VLB)
LOGRASSO, Consolidated Case
Plaintiffs,

-v-

WORLD WRESTLING
ENTERTAINMENT, INC.,

Defendants.

-----x

VIDEOTAPED DEPOSITION OF

EVAN M. SINGLETON

Philadelphia, Pennsylvania

May 11, 2016

9:29 a.m.

Reported by:
Josephine H. Fassett, RPR, CCR
Job No. 44298

2	4
<p>1 May 11, 2016 2 Philadelphia, Pennsylvania 3 9:29 a.m. 4 5 T R A N S C R I P T of the Videotaped 6 Deposition of EVAN M. SINGLETON, pursuant to the 7 Federal Rules of Civil Procedure, held at the offices 8 of Kleinbard LLC, One Liberty Place, 1650 Market 9 Street, Philadelphia, Pennsylvania, on Wednesday, May 10 11, 2016, commencing at approximately 9:29 a.m., 11 before Josephine H. Fassett, a Registered 12 Professional Reporter, Certified Court Reporter and 13 Notary Public. 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>1 A P P E A R A N C E S (cont'd.) : 2 3 ATTORNEYS FOR DEFENDANT: 4 K&L GATES LLP 5 210 Sixth Avenue 6 Pittsburgh, Pennsylvania 15222 7 412.355.6500 8 BY: JERRY S. McDEVITT, ESQ. 9 jerry.mcdevitt@klgates.com 10 STEFANIE M. LACY, ESQ. 11 stefanie.lacy@klgates.com 12 13 14 A L S O P R E S E N T : 15 JOSEPH WILLS, Videographer 16 17 18 19 20 21 22 23 24 25</p>
3	5
<p>1 A P P E A R A N C E S : 2 3 ATTORNEYS FOR PLAINTIFFS: 4 POGUST BRASLOW & MILLROOD LLC 5 Eight Tower Bridge 6 161 Washington Street 7 Suite 940 8 Conshohocken, Pennsylvania 19428 9 610.941.4204 10 BY: HARRIS L. POGUST, ESQ. 11 hpogust@pbmattorneys.com 12 13 -and- 14 15 ATTORNEYS FOR PLAINTIFFS: 16 KYROS LAW OFFICES 17 17 Miles Road 18 Hingham, Massachusetts 02043 19 800.934.2921 20 BY: KONSTANTINE W. KYROS, ESQ. 21 kon@kyroslaw.com 22 23 24 25</p>	<p>1 -----INDEX----- 2 WITNESS PAGE 3 EVAN M. SINGLETON 4 By Mr. McDevitt 9, 284 5 By Mr. Pogust 277 6 7 AFTERNOON SESSION - 189 8 9 -----EXHIBITS----- 10 SINGLETON DESCRIPTION PAGE 11 Exhibit 1 MRI Report for Exam Date 48 12 11/14/2012 13 Exhibit 2 MRI Report for Exam Date 50 14 11/29/2012 15 Exhibit 3 MRI Report for Exam Date 53 16 2/24/2015 17 Exhibit 4 Followup Note on Evan Singleton 55 18 dated December 10, 2012 19 Exhibit 5 Neurological Examination dated 58 20 2/17/2015 21 Exhibit 6 Neurological Examination dated 61 22 3/23/2015 23 Exhibit 7 Emergency Room Visit 11/15/2014 75 24 Report 25</p>

6	<p>1 -----EXHIBITS-----</p> <p>2 SINGLETON DESCRIPTION PAGE</p> <p>3 Exhibit 8 Adam Mercer @MercerWWE Twitter 135</p> <p>4 Tweets</p> <p>5 Exhibit 9 Adam Mercer @WWEMercer Twitter 140</p> <p>6 Tweets</p> <p>7 Exhibit 10 Evan Singleton Talent 143</p> <p>8 Questionnaire</p> <p>9 Exhibit 11 World Wrestling Entertainment, 145</p> <p>10 Inc. Booking Contract</p> <p>11 Exhibit 12 Letter dated May 21, 2012 148</p> <p>12</p> <p>13 Exhibit 13 Candace Renshaw Facebook Page 150</p> <p>14 Exhibit 14 Class Action Complaint 159</p> <p>15 Exhibit 15 Plaintiffs' First Amended 183</p> <p>16 Complaint</p> <p>17 Exhibit 16 Plaintiffs' Second Amended 209</p> <p>18 Complaint</p> <p>19 Exhibit 17 Concussion Evaluation dated 219</p> <p>20 2/21/2013</p> <p>21 Exhibit 18 Followup Note on Evan Singleton 228</p> <p>22 dated January 18, 2013</p> <p>23 Exhibit 19 E-mail dated October 1, 2012 229</p> <p>24 Exhibit 20 Singleton vs. Erick Rowan 237</p> <p>25 6/17/2012 and 9/27/2012 CD</p>	<p>1 (Whereupon, on the video record.)</p> <p>2 THE VIDEOGRAPHER: We're now on the</p> <p>3 record.</p> <p>4 My name is Joseph Wills, the videographer</p> <p>5 from David Feldman Worldwide.</p> <p>6 This is a video deposition in the United</p> <p>7 States District Court for the District of</p> <p>8 Connecticut.</p> <p>9 Today's date is May 11, 2016. The video</p> <p>10 time is 9:29 a.m.</p> <p>11 This deposition is being held at 1650</p> <p>12 Market Street, Philadelphia, Pennsylvania, in</p> <p>13 the matters of McCullough, et al. versus World</p> <p>14 Wrestling Entertainment, Incorporated, and</p> <p>15 Singleton and LoGrasso versus World Wrestling</p> <p>16 Entertainment, Incorporated.</p> <p>17 The deponent is Evan Singleton.</p> <p>18 Would all counsel please identify</p> <p>19 themselves.</p> <p>20 MR. McDEVITT: I'm Jerry McDevitt. I</p> <p>21 represent WWE.</p> <p>22 MR. POGUST: Harris Pogust, Pogust</p> <p>23 Braslow & Millrood, on behalf of the</p> <p>24 plaintiffs.</p> <p>25 MR. KYROS: Konstantine Kyros, Kyros Law,</p>
7	<p>1 -----EXHIBITS-----</p> <p>2 SINGLETON DESCRIPTION PAGE</p> <p>3 Exhibit 21 Singleton Leg Twitching CD 249</p> <p>4 Exhibit 22 Evan Singleton Instagram Account 249</p> <p>5 Page</p> <p>6 Exhibit 23 Evan Singleton Instagram Account 252</p> <p>7 Page</p> <p>8 Exhibit 24 Evan Singleton Instagram Account 256</p> <p>9 Page</p> <p>10 Exhibit 25 Evan Singleton Instagram Account 258</p> <p>11 Page</p> <p>12 Exhibit 26 Evan Singleton Instagram Account 259</p> <p>13 Page</p> <p>14 Exhibit 27 Evan Singleton Facebook Account 263</p> <p>15 Page</p> <p>16 Exhibit 28 Evan Singleton Instagram Account 265</p> <p>17 Page Photograph</p> <p>18 Exhibit 29 Evan Singleton Instagram Account 268</p> <p>19 Page</p> <p>20 Exhibit 30 Evan Singleton Instagram Account 268</p> <p>21 Page</p> <p>22 Exhibit 31 Evan Singleton Instagram Account 270</p> <p>23 Page</p> <p>24 Exhibit 32 Multiple Photographs 271</p> <p>25 Exhibit 33 CD 274</p>	<p>1 on behalf of the plaintiffs.</p> <p>2 THE VIDEOGRAPHER: Will the court</p> <p>3 reporter please swear in the witness.</p> <p>4 E V A N M. S I N G L E T O N, the witness, having</p> <p>5 been duly sworn, was examined and testified</p> <p>6 under oath as follows:</p> <p>7 EXAMINATION BY</p> <p>8 MR. McDEVITT:</p> <p>9 Q. Mr. Singleton, my name is Jerry McDevitt.</p> <p>10 I represent the WWE, so I'll be asking you questions</p> <p>11 today.</p> <p>12 A. Okay.</p> <p>13 Q. And I'd like to begin by asking you to</p> <p>14 state formally your name and address.</p> <p>15 A. My name is Evan Mitchell Singleton. My</p> <p>16 address is 5201 Summerfield Drive, Mount Joy,</p> <p>17 Pennsylvania 17552.</p> <p>18 Q. How far is Mount Joy from here?</p> <p>19 A. About an hour and a half.</p> <p>20 Q. Is that a small town?</p> <p>21 A. Uhm... little bit, yes.</p> <p>22 Q. How many people live there?</p> <p>23 A. I don't know offhand.</p> <p>24 Q. You the biggest guy in town?</p> <p>25 A. If not, I'm pretty close.</p>

3 (Pages 6 to 9)

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1 A. What happened to me wasn't right.
 2 **Q. Wasn't right in what way?**
 3 A. How I was treated.
 4 **Q. And how were you mistreated?**
 5 A. Well, I was bullied by Bill DeMott and
 6 staff. It took a while before I had any kind of real
 7 medical attention given to me. Just things of that
 8 nature.
 9 **Q. Anything else?**
 10 A. Off the top of my head, no.
 11 **Q. Not off the top of your head, you brought**
 12 **the lawsuit and I want to know every reason what you**
 13 **think your claim is here.**
 14 A. Off the top of my head, that's all I --
 15 that's all I have off the top of my head.
 16 **Q. Did WWE intentionally cause you to be**
 17 **injured when you did the move with the performer on**
 18 **September 27th that injured you?**
 19 A. I'm sorry?
 20 **Q. Strike that.**
 21 **You acknowledge, I take it, that you were**
 22 **injured by an accident, correct?**
 23 A. Yes.
 24 **Q. You don't think anybody deliberately**
 25 **tried to injure you, do you?**

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1 A. When performing the choke slam, you're
 2 supposed to fall. When you're the one getting
 3 slammed, you're supposed to fall. I felt there was a
 4 little bit more force behind it than just a fall, but
 5 still an accident nonetheless.
 6 **Q. Right. And the kind of thing that you**
 7 **knew from the minute you walked in the ring those**
 8 **kind of things can happen, right?**
 9 A. Not this serious.
 10 **Q. You didn't think you could get a serious**
 11 **concussion?**
 12 A. Not this bad, no.
 13 **Q. But you realized you could hit your head**
 14 **and get injured?**
 15 A. Yes.
 16 **Q. Now, you say it took a while to get**
 17 **medical attention. Isn't it true that you were told**
 18 **to go home and rest?**
 19 A. Yes.
 20 **Q. And then you were seen by Dr. Amann?**
 21 A. I guess, I don't know.
 22 **Q. You don't know?**
 23 A. I don't remember.
 24 **Q. Well, how long did it take you to get**
 25 **medical attention?**

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1 A. The first MRI I got was like a month
 2 later.
 3 **Q. Well, before MRIs, did you have medical**
 4 **attention?**
 5 A. I was going back to the training facility
 6 to meet with the on-site trainer. That's the extent
 7 of my medical treatment.
 8 **Q. Do you realize you're claiming fraud in**
 9 **this case?**
 10 A. No.
 11 **Q. You don't realize you're making a fraud**
 12 **claim?**
 13 A. No.
 14 **Q. Can you tell me who you think, if**
 15 **anybody, committed a fraud on you?**
 16 A. I'm sorry?
 17 **Q. Who do you think, if anybody, at WWE**
 18 **committed a fraud on you?**
 19 A. I don't know.
 20 **Q. Did anybody at WWE fail to tell you**
 21 **something that you think you should have known?**
 22 A. I don't know.
 23 **Q. Did anybody tell you to go back in the**
 24 **ring and perform despite the fact that your head was**
 25 **injured?**

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1 A. I don't remember.
 2 **Q. Well, you'd know if somebody told you to**
 3 **go back in the ring. I mean, you already testified**
 4 **that nobody sent you back into the ring after your**
 5 **injury, right?**
 6 A. Yeah.
 7 **Q. And do you think that was the correct and**
 8 **right thing for them to do given what you were**
 9 **reporting as your symptoms?**
 10 A. Yes.
 11 **Q. And for two years they paid for that,**
 12 **right?**
 13 A. Yes.
 14 **Q. So, as you sit here today, you can't**
 15 **identify a single act or anything done or not done by**
 16 **WWE that you consider to be fraudulent to you?**
 17 A. I don't know.
 18 **Q. Well, you're the one who is bringing that**
 19 **lawsuit, sir, so I'm asking you: Do you have**
 20 **anything that you considered that was done that was**
 21 **fraudulent to you?**
 22 A. I don't know.
 23 **Q. Do you -- did you like Dr. Amann?**
 24 A. From what I remember, he was okay, I
 25 guess.