

EXHIBIT B

UNITED STATES DISTRICT COURT

DISTRICT OF CONNECTICUT

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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

18	<p>1 Q. Did you attend any presentations given by</p> <p>2 Dr. Maroon when you were in Florida?</p> <p>3 A. Not that I remember, no.</p> <p>4 Q. Not that you remember. Did you happen to</p> <p>5 watch a tape that's been produced in this litigation</p> <p>6 of a presentation he gave?</p> <p>7 MR. POGUST: Objection.</p> <p>8 A. Not that I remember, no.</p> <p>9 Q. You didn't watch the tape?</p> <p>10 A. Not that I remember, no.</p> <p>11 Q. In the course of preparing for this</p> <p>12 deposition, nobody showed you a tape of a</p> <p>13 presentation?</p> <p>14 A. No.</p> <p>15 Q. In the last couple of weeks, nobody's</p> <p>16 shown you a tape of a presentation that Dr. Maroon</p> <p>17 gave to all talent down in Florida?</p> <p>18 MR. POGUST: Objection.</p> <p>19 A. No.</p> <p>20 Q. Were you in Florida in August of 2012?</p> <p>21 A. Yes.</p> <p>22 Q. So you don't deny or admit that you were</p> <p>23 at that presentation, you claim you don't remember</p> <p>24 either way?</p> <p>25 A. I don't remember.</p>	20	<p>1 A. They're the owners of WWE.</p> <p>2 Q. Did you ever watch any television</p> <p>3 programs where Mr. and Mrs. McMahon were being</p> <p>4 interviewed regarding the Chris Benoit situation?</p> <p>5 A. No.</p> <p>6 Q. Never?</p> <p>7 MR. POGUST: You have to answer --</p> <p>8 Q. You have to respond verbally.</p> <p>9 A. No.</p> <p>10 Q. Did you ever watch any television</p> <p>11 programs about the Chris Benoit murder?</p> <p>12 A. Yes.</p> <p>13 Q. What programs did you watch?</p> <p>14 A. Local news.</p> <p>15 Q. Local news?</p> <p>16 A. Yeah.</p> <p>17 Q. And what did you learn by watching those?</p> <p>18 A. I got from the news article that I saw</p> <p>19 that it was about steroid and anti-depressant abuse.</p> <p>20 Q. And when did you read that?</p> <p>21 MR. POGUST: Objection.</p> <p>22 A. I don't remember.</p> <p>23 Q. Did you follow the story as it developed?</p> <p>24 A. No.</p> <p>25 Q. So did you follow the story as it was</p>
19	<p>1 Q. Do you remember him speaking to you about</p> <p>2 concussions?</p> <p>3 A. No.</p> <p>4 Q. Have you ever read any congressional</p> <p>5 testimony by anybody?</p> <p>6 A. I'm sorry, I don't -- congressional</p> <p>7 testimony.</p> <p>8 Q. Of any kind.</p> <p>9 A. What is that?</p> <p>10 Q. Did you ever read any testimony that</p> <p>11 anybody gave before a committee of Congress?</p> <p>12 A. I don't know.</p> <p>13 Q. Well, you'd know, did you do it or didn't</p> <p>14 you?</p> <p>15 MR. POGUST: Objection.</p> <p>16 A. No.</p> <p>17 Q. Did you ever read any testimony of</p> <p>18 Stephanie McMahon?</p> <p>19 A. No.</p> <p>20 Q. Did you ever watch any television</p> <p>21 programs where Vince and Linda McMahon -- well, first</p> <p>22 of all, let me ask you: Do you know who Vince and</p> <p>23 Linda McMahon are?</p> <p>24 A. Yes.</p> <p>25 Q. Who are they?</p>	21	<p>1 reported that he had brain damage?</p> <p>2 A. No.</p> <p>3 Q. You missed that somehow?</p> <p>4 A. (Nods.)</p> <p>5 Q. Is that a yes?</p> <p>6 A. Yes.</p> <p>7 Q. So you missed all the news coverage of</p> <p>8 that, of that story?</p> <p>9 A. Yes.</p> <p>10 Q. Even though you'd been a wrestling fan</p> <p>11 all your life?</p> <p>12 A. Yes.</p> <p>13 Q. When did you first learn that Chris</p> <p>14 Benoit supposedly had brain damage?</p> <p>15 A. I didn't. I didn't, I don't know. I</p> <p>16 didn't know that.</p> <p>17 Q. So this is the first time you've heard of</p> <p>18 that?</p> <p>19 A. Yeah.</p> <p>20 Q. Today?</p> <p>21 A. Yeah.</p> <p>22 Q. Up until the moment you walked in this</p> <p>23 room, you never heard that Chris Benoit had brain</p> <p>24 damage?</p> <p>25 A. Yes.</p>

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<p>1 Q. Did he seem to be concerned about your 2 health?</p> <p>3 A. I guess.</p> <p>4 Q. Well, did he do anything that indicated 5 he was taking your reports cavalierly?</p> <p>6 A. Not that I remember. I don't, I don't 7 remember.</p> <p>8 Q. I think you indicated that when you were 9 at WWE you did know that as long as you claimed you 10 were symptomatic of a concussion that they would not 11 allow you to go back in the ring. Do you remember 12 that testimony?</p> <p>13 A. Yes.</p> <p>14 Q. And would it be fair to say you learned 15 that before September 27th, the day you got injured?</p> <p>16 A. Yes.</p> <p>17 Q. All right. So you would have learned by 18 definition, then, that you can get a concussion doing 19 this, and if you get a concussion, you will not be 20 allowed back in the ring, correct?</p> <p>21 A. I don't know.</p> <p>22 Q. Well, I mean, doesn't that flow from 23 that, sir, if you're told that if you get a 24 concussion you will not be allowed back in the ring, 25 and you knew that before you went in the ring on</p>	<p>1 Q. When you were talking to Dr. Amann, did 2 you have the opportunity to ask him any questions you 3 wanted to ask him?</p> <p>4 A. Yes.</p> <p>5 Q. And did you ask him any questions?</p> <p>6 A. I don't remember.</p> <p>7 Q. And you also -- well, do you have any 8 reason to think that Dr. Amann didn't answer your 9 questions honestly?</p> <p>10 A. I don't remember.</p> <p>11 Q. Well, as you sit there today, can you 12 identify anything he said to you that wasn't true or 13 accurate?</p> <p>14 A. I don't remember.</p> <p>15 Q. Well, I'm not asking what you remember, 16 I'm asking: Can you, as you're sitting there today, 17 say anything that Dr. Amann told you that was false?</p> <p>18 A. I don't know.</p> <p>19 Q. So then, you don't know anything, right, 20 that you can identify that he told you was false, 21 right?</p> <p>22 MR. POGUST: Because he doesn't remember 23 it.</p> <p>24 MR. McDEVITT: Well, if he doesn't 25 remember it, then he can't say it.</p>
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<p>1 September 27th of 2012, right?</p> <p>2 A. Yes.</p> <p>3 Q. So you knew going into the ring that day 4 that you could get a concussion?</p> <p>5 A. I don't know.</p> <p>6 Q. You can't put those two together?</p> <p>7 MR. POGUST: Objection.</p> <p>8 Q. If somebody is telling you that if you 9 get a concussion, you will not be allowed back in the 10 ring and then you make a choice to go into the ring, 11 right?</p> <p>12 A. I -- I don't know.</p> <p>13 Q. Was there somebody else I could ask about 14 what you know other than you?</p> <p>15 A. I don't know.</p> <p>16 Q. When you went down there in January, did 17 you watch a videotape of Dr. Maroon giving a 18 presentation?</p> <p>19 A. I don't remember one, no.</p> <p>20 Q. Do you recall ever being talked to about 21 a drug called spice?</p> <p>22 A. No.</p> <p>23 Q. Do you recall seeing a presentation about 24 a drug called spice?</p> <p>25 A. No.</p>	<p>1 Q. I mean, you know, why do we have to have 2 this constant I don't remember. You either remember 3 something or you don't. If you don't, then you can't 4 identify it.</p> <p>5 Can you identify anything, as you sit 6 there, that Dr. Amann told you that was false?</p> <p>7 A. I don't know.</p> <p>8 Q. How about Dr. Maroon?</p> <p>9 A. I don't know.</p> <p>10 Q. Can you identify a single thing that he 11 told you that was false?</p> <p>12 A. I don't know.</p> <p>13 Q. How about any of the medical providers 14 that you saw?</p> <p>15 A. I don't know.</p> <p>16 Q. So you can't identify a single thing 17 anybody told you that was false as you sit here 18 today, right?</p> <p>19 A. I don't know.</p> <p>20 Q. Well, you know, you just can't identify 21 anything. You know if you can identify something, 22 sir. Can you --</p> <p>23 MR. POGUST: Objection.</p> <p>24 MR. McDEVITT: He does --</p> <p>25 MR. POGUST: Asked and answered.</p>

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275	<p>1 to whether you were there or not.</p> <p>2 THE WITNESS: Okay.</p> <p>3 (Whereupon, CD played.)</p> <p>4 BY MR. McDEVITT:</p> <p>5 Q. Does it trigger any recollection on your</p> <p>6 part as to whether you were there during that</p> <p>7 presentation?</p> <p>8 A. No.</p> <p>9 MR. POGUST: Live you mean. Didn't watch</p> <p>10 the video but was actually in the audience?</p> <p>11 MR. McDEVITT: Actually in the audience.</p> <p>12 A. No.</p> <p>13 Q. Could have been, could not have been, you</p> <p>14 just don't remember one way or the other?</p> <p>15 A. I never remember that, no.</p> <p>16 Q. Did you see the heads of some of the</p> <p>17 people sitting in the audience?</p> <p>18 A. Oh, it was kind of -- oh, the heads of</p> <p>19 the audience, yeah.</p> <p>20 Q. Did you recognize any of them?</p> <p>21 A. Erick Rowan was in there.</p> <p>22 Q. Erick who?</p> <p>23 A. Erick Rowan.</p> <p>24 Q. Okay. Anybody else did you recognize?</p> <p>25 A. Not really too-too much, no.</p>	277	<p>1 MR. McDEVITT: So your counsel will talk</p> <p>2 to you about that. And, in the meantime, I</p> <p>3 have no further questions.</p> <p>4 MR. POGUST: We have a couple of</p> <p>5 follow-ups.</p> <p>6 EXAMINATION BY</p> <p>7 MR. POGUST:</p> <p>8 Q. Evan, you testified earlier today</p> <p>9 regarding an exhibit which I believe was marked as</p> <p>10 Singleton 16. It's the Plaintiffs' Second Amended</p> <p>11 Complaint.</p> <p>12 Mr. McDevitt asked you a question about</p> <p>13 at the time that this was filed back in June of 2015</p> <p>14 whether you were able to drive or were driving, and</p> <p>15 you testified that you were. Was that answer</p> <p>16 correct?</p> <p>17 A. No.</p> <p>18 Q. So why did you say that then?</p> <p>19 A. I misheard him when he asked the</p> <p>20 question. I thought he said this year, May of this</p> <p>21 year.</p> <p>22 Q. Okay. And when did you -- when did you</p> <p>23 first start to drive after, after your accident?</p> <p>24 A. The specific time I don't remember.</p> <p>25 Q. How long ago from today? Months? A year</p>

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<p>1 lawyer and have them review it to make sure that</p> <p>2 everything looks okay, and then if it's okay to sign</p> <p>3 it and send it back?</p> <p>4 A. No.</p> <p>5 Q. What was told to you?</p> <p>6 A. Sign it. Send it back. FedEx it back.</p> <p>7 Q. And tell -- and what did you do when you</p> <p>8 got the agreement?</p> <p>9 A. I skimmed through it and then I signed</p> <p>10 it. Had someone notarize it and then I Fedexed it</p> <p>11 back.</p> <p>12 Q. How soon after you got the agreement did</p> <p>13 you do that?</p> <p>14 A. I don't remember.</p> <p>15 Q. Days? Months? Weeks?</p> <p>16 A. Days.</p> <p>17 Q. How were you feeling when you got the</p> <p>18 agreement?</p> <p>19 A. Excited. I was 18 years old and offered</p> <p>20 a contract from WWE, that's almost unheard of. I was</p> <p>21 excited. I was happy.</p> <p>22 Q. You were just shown a video of some -- of</p> <p>23 a, for a better word, a seminar that was going on at</p> <p>24 WWE regarding concussions.</p> <p>25 A. Yes.</p>	<p>1 weights to me is the only time where I'm feeling</p> <p>2 truly happy. It's the only time that I don't have to</p> <p>3 worry about anything. I don't feel anxious. I don't</p> <p>4 feel depressed. I just go in there and I lift. And</p> <p>5 it's -- to me it's ecstasy. It's weird to say, but</p> <p>6 to me -- it's a little corny -- but to me it's</p> <p>7 ecstasy. I love it.</p> <p>8 Q. It's like your therapy?</p> <p>9 A. It's better than therapy.</p> <p>10 MR. POGUST: Okay. That's all I have.</p> <p>11 FURTHER EXAMINATION BY</p> <p>12 MR. McDEVITT:</p> <p>13 Q. You say nobody ever told you the danger</p> <p>14 of a choke slam in the sense that you could be</p> <p>15 seriously hurt if you did it wrong?</p> <p>16 A. Permanently, yes.</p> <p>17 Q. Why do you think they taught you to tuck</p> <p>18 your head?</p> <p>19 A. That's how the move was performed.</p> <p>20 Q. Do you think that had something to do</p> <p>21 with protecting your head from injury?</p> <p>22 A. I don't know.</p> <p>23 Q. You couldn't figure out why they would</p> <p>24 tell you to tuck your head so your head didn't hit</p> <p>25 the mat was to protect against injury?</p>
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<p>1 Q. Amongst other things.</p> <p>2 A. Yes.</p> <p>3 Q. Do you recall receiving any information</p> <p>4 from WWE regarding head injuries and concussions?</p> <p>5 A. No.</p> <p>6 Q. Do you remember ever talking to anybody</p> <p>7 about the long-term effect of concussions when you</p> <p>8 were working for the WWE?</p> <p>9 A. No.</p> <p>10 Q. Were you ever told by anybody from the</p> <p>11 WWE that concussions, even one concussion, can have a</p> <p>12 long-term or permanent effect on you?</p> <p>13 A. Not to my recollection.</p> <p>14 MR. McDEVITT: Object to the form and</p> <p>15 foundation.</p> <p>16 A. Not to my recollection.</p> <p>17 MR. POGUST: I think that's all we have.</p> <p>18 Hold on. Almost.</p> <p>19 BY MR. POGUST:</p> <p>20 Q. I think -- you testified about, about</p> <p>21 your weight lifting. Tell us, how did that make you</p> <p>22 feel when you were lifting the weights?</p> <p>23 A. Lifting weights now to me is the only</p> <p>24 time of day dealing with my anxiety and my depression</p> <p>25 and everything that's going on in my life, lifting</p>	<p>1 A. I don't know. Maybe it was to help, help</p> <p>2 with the, the impact. Like the same thing that you</p> <p>3 stretch out your arms when you do a bump.</p> <p>4 Q. Well, so did you think then it would be a</p> <p>5 good idea to hit your head on the mat?</p> <p>6 A. No.</p> <p>7 Q. You could figure that out, can't you,</p> <p>8 Mr. Singleton, that it's not a good idea to land on</p> <p>9 your head?</p> <p>10 A. Yes.</p> <p>11 Q. You knew that before you ever started</p> <p>12 wrestling with WWE, didn't you?</p> <p>13 A. Yes.</p> <p>14 Q. You don't need somebody to tell you that,</p> <p>15 do you?</p> <p>16 A. I need to learn how to do the move</p> <p>17 correctly.</p> <p>18 Q. And you were taught how to do the move</p> <p>19 correctly, right? And you did it correctly in June,</p> <p>20 didn't you?</p> <p>21 A. I don't really remember that, but.</p> <p>22 Q. You just saw it on tape, didn't you?</p> <p>23 A. Yeah.</p> <p>24 Q. And you did it correctly, didn't you?</p> <p>25 A. Yeah.</p>