

# **Exhibit 3**

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

EVAN SINGLETON and VITO  
LOGRASSO,

Plaintiffs,

v.

WORLD WRESTLING ENTERTAINMENT,  
INC.,

Defendant

Lead Case No. 3:15-cv-1074-VLB

**PLAINTIFF EVAN SINGLETON'S SUPPLEMENTAL OBJECTIONS AND  
RESPONSES TO DEFENDANT WORLD WRESTLING ENTERTAINMENT, INC.'S  
FIRST AND SECOND SET OF INTERROGATORIES**

NOW COMES Plaintiff Evan Singleton, by and through his undersigned attorneys, and herein submits the following supplemental objections and responses to Defendant World Wrestling Entertainment Inc.'s ("WWE") First Set of Interrogatories Directed to Plaintiff Evan Singleton under verification pursuant to the Federal Rules of Civil Procedure.

**GENERAL OBJECTIONS**

1. Plaintiff objects to the definitions and instructions set forth in the Interrogatories propounded by Defendant. Plaintiff objects to the instructions on the ground that the relevant provisions of the Federal Rules of Civil Procedure provide all instructions recognized under federal law with respect to answering or responding to Interrogatories. In answers to these Interrogatories, all words have been defined pursuant to their common English definition. These Interrogatories will be responded to pursuant to the instructions set forth by the Federal Rules of Civil Procedure.

**SPECIFIC OBJECTIONS AND RESPONSES TO  
FIRST SET OF INTERROGATORIES**

**Interrogatory No. 1: Identify All persons who provided information used in drafting the SAC, including in Your response the specific information provided by each person.**

**Response: See General Objections 2, 3, 5, & 8.**

Subject to and without waiving these objections, Plaintiff states that the statements, claims and allegations of the SAC were the products of information collected, reviewed and/or otherwise known by Plaintiffs and Plaintiffs' attorneys. Plaintiff also refers Defendant to the various citations that appear within the SAC for the sources of some of the information. Any further information about the manner in which Plaintiffs and Plaintiffs' counsel drafted and/or formed the SAC are protected by attorney-client privilege and/or the attorney work product doctrine.

**Interrogatory No. 2: Identify and describe in detail all treatment You sought for any injury and/or TBI you claim to have suffered while performing for WWE, including, who You sought treatment from, the date you sought treatment, and the treatment prescribed to You.**

**Response: See General Objections 3, 5, 6, 7 & 8.**

Plaintiff further objects because this impermissibly seeks premature disclosure of experts and expert information or requires Plaintiff to disclose analyses, comparative analyses, opinions, or theories that will be the subject of expert testimony. Subject to and without waiving these objections, Plaintiff states that the only injury for which treatment was

sought was the TBI that occurred on September 27, 2012. Regarding that treatment, Plaintiff refers Defendant to Paragraphs 104 to 117 of the Second Amended Complaint. Additionally, Plaintiff states that he was treated for his TBI and associated symptoms at points between 2012 to present from the following health providers: WWE's Drs. Mark Lovell, Christopher Amann, and Joseph Maroon as well as Dr. Mark Greenberg, Dr. Nancy T. Rodgers-Neame, Dr. Darren Rothschild, Dr. Karen Milo, Dr. Garry Mueller, and Dr. Wen Wu-Chen (information provided below). Subject to Rule 33(d), Plaintiff refers WWE to the medical records from these physicians for the specific dates, tests, and treatments provided by these physicians.

**Interrogatory No. 3:** Identify all health care providers who have examined or treated You entered high school until the present time.

**Response:** See General Objections 5, 6 & 8.

Subject to and without waiving these objections, Plaintiff incorporates by reference his answer to Interrogatory No. 2. WWE should be in possession of the last known address and place of employment for WWE's Drs. Mark Lovell, Christopher Amann, and Joseph Maroon. For the other physicians identified above, Plaintiff provides the following:

Dr. Mark Greenberg - University South FL Medical Grp, 2  
Tampa General Cir. Tampa, FL 33606;

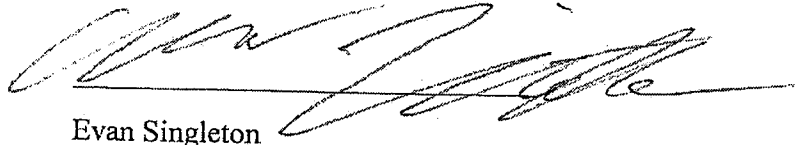
Dr. Nancy T. Rodgers-Neame - Florida Comprehensive  
Epilepsy and Seizure Disorders Program 3000 E Fletcher Ave,  
Ste 250 Tampa, FL 33613;

Dr. Darren Rothschild - 1931 Nebraska Ave, Palm Harbor, FL  
34683;

**VERIFICATION**

I, Evan Singleton, being duly sworn, hereby verify that I have reviewed the above Supplemental Objections and Responses to WWE's First Set of Interrogatories and Requests for Production, and they are true, accurate, and complete to the best of my knowledge.

Date: 3/30/16

  
Evan Singleton