Exhibit 4

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

LOGRASSO,

EVAN SINGLETON and VITO No. 3:15-cv-00425 (VLB) 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

1

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	2			4
1	May 11, 2016	1	APPEARANCES (cont'd.):	
2	Philadelphia, Pennsylvania	2		
3	9:29 a.m.	3	ATTORNEYS FOR DEFENDANT:	
4		4	K&L GATES LLP	
5	TRANSCRIPT of the Videotaped	5	210 Sixth Avenue	
6	Deposition of EVAN M. SINGLETON, pursuant to the	6	Pittsburgh, Pennsylvania 15222	
7	Federal Rules of Civil Procedure, held at the offices	7	412.355.6500	
8	of Kleinbard LLC, One Liberty Place, 1650 Market	8	BY: JERRY S. McDEVITT, ESQ.	
9	Street, Philadelphia, Pennsylvania, on Wednesday, May	9	jerry.mcdevitt@klgates.com	
10	11, 2016, commencing at approximately 9:29 a.m.,	10	STEFANIE M. LACY, ESQ.	
11	before Josephine H. Fassett, a Registered	11	stefanie.lacy@klgates.com	
12	Professional Reporter, Certified Court Reporter and	12		
13	Notary Public.	13		
14		14	ALSO PRESENT:	
1.5		15	JOSEPH WILLS, Videographer	
16		16		
17		17		
18		18		
19		19		
20		20		
21		21		
22 23		22		
24		23 24		
25		24 25		
2 J		2.5		
	3			5
1	APPEARANCES:	1	INDEX	
2		2	WITNESS PAGE	
3	ATTORNEYS FOR PLAINTIFFS:	3	EVAN M. SINGLETON	
4	POGUST BRASLOW & MILLROOD LLC	4	By Mr. McDevitt 9, 284	
5	Eight Tower Bridge	5	By Mr. Pogust 277	
6	161 Washington Street	6		
7	Suite 940	7	AFTERNOON SESSION - 189	
8	Conshohocken, Pennsylvania 19428	8		
9	610.941.4204	9	EXHIBITS	
10	BY: HARRIS L. POGUST, ESQ.	10	SINGLETON DESCRIPTION	PAGE
11	hpogust@pbmattorneys.com	11	Exhibit 1 MRI Report for Exam Date	48
12		12	11/14/2012	
13	-and-	13	Exhibit 2 MRI Report for Exam Date	50
14		14	11/29/2012	
15	ATTORNEYS FOR PLAINTIFFS:	15	Exhibit 3 MRI Report for Exam Date	53
16	KYROS LAW OFFICES	16	2/24/2015	
17	17 Miles Road	17	Exhibit 4 Followup Note on Evan Singleton	55
18	Hingham, Massachusetts 02043	18	dated December 10, 2012	50
19	800.934.2921	19	Exhibit 5 Neurological Examination dated	58
20	BY: KONSTANTINE W. KYROS, ESQ.	20	2/17/2015	61
21	kon@kyroslaw.com	21	Exhibit 6 Neurological Examination dated	61
22		22	3/23/2015 Evhibit 7 Emergangy Poom Visit 11/15/2014	75
23		23 24	Exhibit 7 Emergency Room Visit 11/15/2014	13
24		24	Report	
25		25		

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

	142		144
1	FCW/NXT in Florida, did they have athletic trainers	1	BY MR, McDEVITT;
2	there?	2	Q. Mr. Singleton, I've handed you what's
3	A. Athletic trainers being like what?	3	been marked as Exhibit 10.
4	Q. Athletic trainers.	4	Do you recognize the second, third and
5	A. What's an athletic trainer?	5	fourth pages here as something you submitted to the
6	MR. POGUST: If you don't understand	6	WWE in connection with trying to get a position with
7	A. I don't understand the question.	7	WWE?
8	Q. People that attend to medical ailments	8	A. Yes.
9	and	9	Q. And did you fill this out?
10	A. Oh, okay, okay. Yes.	10	A. I remember mine written down, but.
11	Q. And who were they?	11	Q. All right. And if you go to page 2997 at
12	A. I remember they had one trainer, his name	12	the bottom there, am I correct it indicates your
13	was Brian, I don't remember his last name.	13	interest in hobbies was watching wrestling matches?
14	Q. And did you deal with him much?	14	A. Where's that at? Okay. Yes.
15	A. Not really.	15	Q. At the very bottom of this when it says
16	Q. All right. Aside from the September 27th	16	do you have any hidden talents or passions, what did
17	head injury that you reported to WWE, did you report	17	you write?
18	any other head injury to WWE doctors or trainers	18	A. I am a talented artist and have a great
19	while you were performing?	19	memory .
20	A. I don't know.	20	Q. Does that refresh your recollection that
21	Q. Well, as you sit here today, can you	21	you claim to have a great memory?
22	identify any other time that you told them that you	22	A. No.
23	had a head injury?	23	Q. And then at the top of the page, it says:
24	A. No.	24	Why did you get into wrestling? And what did you
25	Q. As you sit there today, aside from the	25	answer?
	143		145
1	September 27th episode that we're here about, do you	1	MR. POGUST: The next page?
2	recall any instance where you had a head injury?	2	MR. McDEVITT: Yes.
3	A. No.	3	A. You want me to read it?
4	Q. And is the, to your knowledge, the injury	4	Q. Yes.
5	you sustained on the 27th to your head, is that the	5	A. I always wanted to be a wrestler since my
6	only time in your life you have ever had a	6	dad and I watched WCW when I was growing up. The
7	concussion?	7	rest is history. I just love everything about the
8	A. Yes.	8	business.
9	Q. Have you ever been in a street fight?	9	Q. What was it about the business that you
10	A. No.	10	love?
11	Q. So you've never gotten punched in the	11	A. The entertainment factor.
12	head in a real fight?	12	Q. What did you find about it to be so
13	A. No.	13	entertaining?
14	Q. And you, I think indicated, you never had	14	A. The storylines. The storylines really
15	a concussion playing football?	15	had a way of just entrancing me when I was at that
16	A. No.	16	age.
17	Q. Did you ever land on your head doing	17	Q. Any particular storylines that you
18	amateur wrestling?	18	remember?
19	A. No.	19	A. No, nothing specific, just big picture.
20	Q. Never had a concussion there either?	20	(World Wrestling Entertainment, Inc.
21	A. No.	21	Booking Contract marked as Singleton Exhibit
22	(Evan Singleton Talent Questionnaire	22	11, as of this date.)
23	marked as Singleton Exhibit 10, as of this	23	BY MR. McDEVITT:
24	date.)	24	Q. I've just handed you what's been marked
25		25	as Exhibit 11. Do you recognize that document,