

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

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

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1 **FCW/NXT in Florida, did they have athletic trainers**
 2 **there?**
 3 A. Athletic trainers being like what?
 4 **Q. Athletic trainers.**
 5 A. What's an athletic trainer?
 6 MR. POGUST: If you don't understand --
 7 A. I don't understand the question.
 8 **Q. People that attend to medical ailments**
 9 **and --**
 10 A. Oh, okay, okay. Yes.
 11 **Q. And who were they?**
 12 A. I remember they had one trainer, his name
 13 was Brian, I don't remember his last name.
 14 **Q. And did you deal with him much?**
 15 A. Not really.
 16 **Q. All right. Aside from the September 27th**
 17 **head injury that you reported to WWE, did you report**
 18 **any other head injury to WWE doctors or trainers**
 19 **while you were performing?**
 20 A. I don't know.
 21 **Q. Well, as you sit here today, can you**
 22 **identify any other time that you told them that you**
 23 **had a head injury?**
 24 A. No.
 25 **Q. As you sit there today, aside from the**

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1 **September 27th episode that we're here about, do you**
 2 **recall any instance where you had a head injury?**
 3 A. No.
 4 **Q. And is the, to your knowledge, the injury**
 5 **you sustained on the 27th to your head, is that the**
 6 **only time in your life you have ever had a**
 7 **concussion?**
 8 A. Yes.
 9 **Q. Have you ever been in a street fight?**
 10 A. No.
 11 **Q. So you've never gotten punched in the**
 12 **head in a real fight?**
 13 A. No.
 14 **Q. And you, I think indicated, you never had**
 15 **a concussion playing football?**
 16 A. No.
 17 **Q. Did you ever land on your head doing**
 18 **amateur wrestling?**
 19 A. No.
 20 **Q. Never had a concussion there either?**
 21 A. No.
 22 (Evan Singleton Talent Questionnaire
 23 marked as Singleton Exhibit 10, as of this
 24 date.)
 25

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1 BY MR. McDEVITT:
 2 **Q. Mr. Singleton, I've handed you what's**
 3 **been marked as Exhibit 10.**
 4 **Do you recognize the second, third and**
 5 **fourth pages here as something you submitted to the**
 6 **WWE in connection with trying to get a position with**
 7 **WWE?**
 8 A. Yes.
 9 **Q. And did you fill this out?**
 10 A. I remember mine written down, but.
 11 **Q. All right. And if you go to page 2997 at**
 12 **the bottom there, am I correct it indicates your**
 13 **interest in hobbies was watching wrestling matches?**
 14 A. Where's that at? Okay. Yes.
 15 **Q. At the very bottom of this when it says**
 16 **do you have any hidden talents or passions, what did**
 17 **you write?**
 18 A. I am a talented artist and have a great
 19 memory .
 20 **Q. Does that refresh your recollection that**
 21 **you claim to have a great memory?**
 22 A. No.
 23 **Q. And then at the top of the page, it says:**
 24 **Why did you get into wrestling? And what did you**
 25 **answer?**

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1 MR. POGUST: The next page?
 2 MR. McDEVITT: Yes.
 3 A. You want me to read it?
 4 **Q. Yes.**
 5 A. I always wanted to be a wrestler since my
 6 dad and I watched WCW when I was growing up. The
 7 rest is history. I just love everything about the
 8 business.
 9 **Q. What was it about the business that you**
 10 **love?**
 11 A. The entertainment factor.
 12 **Q. What did you find about it to be so**
 13 **entertaining?**
 14 A. The storylines. The storylines really
 15 had a way of just entrancing me when I was at that
 16 age.
 17 **Q. Any particular storylines that you**
 18 **remember?**
 19 A. No, nothing specific, just big picture.
 20 (World Wrestling Entertainment, Inc.
 21 Booking Contract marked as Singleton Exhibit
 22 11, as of this date.)
 23 BY MR. McDEVITT:
 24 **Q. I've just handed you what's been marked**
 25 **as Exhibit 11. Do you recognize that document,**