

Exhibit 6

UNITED STATES DISTRICT COURT

DISTRICT OF CONNECTICUT

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RUSS MCCULLOUGH, et al.,

Plaintiff,

vs.

No. 3:15-cv-01074 (VLB)

WORLD WRESTLING ENTERTAINMENT, INC.,

Defendant.

-----x
EVAN SINGLETON and VITO LOGRASSO,

Plaintiffs,

vs.

No. 3:15-cv-00425 (VLB)

WORLD WRESTLING ENTERTAINMENT, INC.,

Defendant.

-----x

VIDEOTAPED DEPOSITION OF VITO LOGRASSO

Philadelphia, Pennsylvania

May 18, 2016

9:35 a.m.

Reported by:
Jennifer Ocampo-Guzman, CRR, CLR
JOB NO. 44300

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May 18, 2016
9:35 a.m.

Videotaped Deposition of VITO
LOGRASSO, held at the offices of
Kleinbard, LLC, 1650 Market Street,
Philadelphia, Pennsylvania, pursuant to
notice, before Jennifer Ocampo-Guzman,
a Certified Real-Time Shorthand
Reporter and Notary Public of the
Commonwealth of Pennsylvania.

A P P E A R A N C E S (Cont.d):

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ALSO PRESENT:
JOSEPH WILLS, Videographer

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A P P E A R A N C E S:

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T H E V I D E O G R A P H E R: We are now on
the record.
My name is Joseph Wills, the
videographer obtained by David Feldman
Worldwide. This is a video deposition
for the United States District Court for
the District of Connecticut. Today's
date is May 18, 2016, and the video time
is 9:35 a.m.
This deposition is being held at
1650 Market Street, Philadelphia,
Pennsylvania, in the matters of
McCullough, et al., versus World
Wrestling Entertainment Incorporated and
Singleton and LoGrasso versus World
Wrestling Entertainment Incorporated.
The deponent is Vito LoGrasso.
Will all counsel please identify
themselves.
MR. SCIOLLA: Andrew Sciolla from
Pogust Braslow Millrood, on behalf the
plaintiff, Vito LoGrasso.
MR. KYROS: Konstantine Kyros,
Kyros Law Offices, for the plaintiff,
Vito LoGrasso.

6	<p>1 MR. NORRIS: Anthony Norris, Kyros 2 Law Offices, for the plaintiff. 3 MR. McDEVITT: Jerry McDevitt for 4 WWE. 5 MS. LACY: Stefanie Lacy for WWE. 6 VITO J. LOGRASSO, called 7 as a witness, having been duly sworn, was 8 examined and testified as follows: 9 EXAMINATION BY 10 MR. McDEVITT: 11 Q. Would you state your name for the 12 record, please? 13 A. Veto J. LoGrasso. 14 Q. Have you ever testified under oath 15 before? 16 A. No, sir. 17 Q. Do you understand the oath you've 18 just taken? 19 A. Yes, sir. 20 Q. And you understand it obligates you 21 to tell the truth, even if telling the truth 22 is against your interest? 23 A. Yes. 24 Q. And even if the truth is contrary 25 to what you said in court pleadings?</p>	8	<p>1 A. She was more of an indie wrestler. 2 Q. When were you married? 3 A. September 27, 2014. 4 If I got that wrong, I die. 5 Q. We're going ask her whether you 6 were right. 7 MR. SCIOLLA: Jerry, I don't meant 8 interrupt, but as you can see, he's 9 leaning toward you. As much as you can, 10 keep your voice up so that he can hear. 11 MR. McDEVITT: If you can't hear or 12 understand any question I ask you, just 13 tell me and I will be glad to raise my 14 voice, but I don't want to appear like 15 I'm yelling at you. 16 I may yell at you anyway, but -- 17 THE WITNESS: It's okay. 18 Q. But seriously, if you cannot hear 19 me, tell me. 20 A. Okay. 21 Q. Is your wife disabled? 22 A. Yes. 23 Q. And what's the nature of her 24 disability? 25 A. She has three herniated disks and</p>
7	<p>1 A. Yes, sir. 2 Q. What's your date of birth, sir? 3 A. 6/18/64. 4 Q. And what is your current address? 5 A. 12 Flemming Drive, Coatesville, 6 Pennsylvania, 19320. 7 Q. Do you own that property? 8 A. No, I do not. My wife does. 9 Q. How long have you lived there? 10 A. Two years, I think. 11 Q. Does anybody else live there 12 besides you and your wife? 13 A. No, just us. 14 Q. What is your wife's name? 15 A. Becca, B-E-C-A -- C-C-A. 16 Q. What was her maiden name? 17 A. Ford. 18 Q. And am I correct, she was also a 19 previous performer in the wrestling business? 20 A. Yes, sir. 21 Q. But not with WWE, correct? 22 A. No. 23 Q. She was with WCW? 24 A. No. 25 Q. Who did she perform for?</p>	9	<p>1 spinal stenosis. 2 Q. And prior to moving to 3 Pennsylvania, you lived in Florida? 4 A. Yes, sir. 5 Q. When did you move to Pennsylvania? 6 A. Let's see. I'm not sure of the 7 day. I know it was in 2014, I think. 8 Q. The year is fine. The year 2014? 9 A. I think so, yeah. 10 Q. Why did you move back to 11 Pennsylvania? 12 A. Because I closed my wrestling 13 school, and I decided to get married. 14 Q. Why couldn't you stay in Florida? 15 A. My wife lives here, and she has two 16 children here. 17 Q. Is it true you hate living in 18 Pennsylvania? 19 A. Say that one more time? 20 Q. You hate living in Pennsylvania? 21 A. I'm not fond of Pennsylvania. The 22 people are nice, but I'm not too fond of 23 Pennsylvania. 24 Q. Have you told some of your 25 healthcare providers you hate living in</p>

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1 on the weeks that I was off.
 2 **Q. Was DeMott a Facebook friend of**
 3 **yours?**
 4 A. No.
 5 **Q. Never?**
 6 A. He was at one time, I believe.
 7 **Q. And when was that?**
 8 A. I'm not even sure.
 9 **Q. Did you ever read any congressional**
 10 **testimony in the Benoit matter?**
 11 A. Read congressional testimony?
 12 **Q. Yeah.**
 13 A. No.
 14 **Q. Are you a boxing fan?**
 15 A. A boxing fan?
 16 **Q. Yes.**
 17 A. Yes, sir.
 18 **Q. And do you follow Muhammad Ali?**
 19 A. Pretty much.
 20 **Q. And have you followed his**
 21 **deterioration in health?**
 22 A. I know of it. I don't follow it,
 23 as per se.
 24 **Q. And what is your understanding of**
 25 **what caused his deterioration?**

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1 MR. SCIOLLA: Objection, calls for
 2 speculation.
 3 A. It's a lot of blows to the head.
 4 **Q. Did you see him light the Olympic**
 5 **torch in Atlanta several years ago?**
 6 A. I might have.
 7 **Q. Did you generally watch the**
 8 **Olympics?**
 9 A. I watched the Olympics. I might
 10 have watched him do it. I'm not sure.
 11 **Q. Are you familiar with what I'm**
 12 **talking about? How he came out and lit the**
 13 **Olympic torch in Atlanta in 1996?**
 14 A. Vaguely.
 15 **Q. And if you watched that in 1996 and**
 16 **you watched Muhammad Ali, did you conclude**
 17 **that he was suffering from brain damage?**
 18 MR. SCIOLLA: Objection, calls for
 19 speculation.
 20 A. I don't know because I didn't watch
 21 the tape, so I don't know. Again, I can't
 22 answer that.
 23 **Q. Have you seen him in public where**
 24 **he shakes?**
 25 A. I've seen him with the shakes.

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1 **Q. And he didn't seen talk any more,**
 2 **does he?**
 3 A. Not that I know of, sir.
 4 MR. SCIOLLA: Objection, calls for
 5 speculation.
 6 **Q. And he's been that way for quite a**
 7 **while, hasn't he?**
 8 MR. SCIOLLA: Objection.
 9 A. I think so.
 10 **Q. And that's another instance where**
 11 **you could have deduced that that man suffered**
 12 **brain damage from blows to the head, right?**
 13 MR. SCIOLLA: Objection.
 14 A. I would assume so.
 15 **Q. You indicated I think --**
 16 MR. McDEVITT: Strike that.
 17 **Q. When did you say your last match in**
 18 **2007 with WWE in the main roster was?**
 19 A. I didn't.
 20 **Q. When was that?**
 21 A. I'm not sure.
 22 **Q. It was prior to June though, wasn't**
 23 **it.**
 24 **I mean, you were gone by the time**
 25 **Benoit had murdered his wife, right?**

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1 A. Yes.
 2 **Q. Did you talk to him in that part of**
 3 **2007, prior to the murders?**
 4 A. Locker room talk?
 5 **Q. Yeah.**
 6 A. "How are you doing, what's going
 7 on."
 8 **Q. Right.**
 9 A. I mean before Eddie Guerrero died,
 10 we were talking this, me, Nunzio, Chavo,
 11 Benoit and Eddie, we used to go to the gym
 12 all the time at the same time, and we all
 13 used to meet.
 14 So you're asking me if I was
 15 friendly with him, during train or after
 16 shows, yes.
 17 Have an extensive conversations
 18 with him, no.
 19 **Q. Do you remember the last time you**
 20 **talked to him?**
 21 A. Not at all.
 22 **Q. Have you ever known any 85-year-old**
 23 **people with dementia?**
 24 A. 85-year-old people with the
 25 dementia?

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1 **Q. Around 85 years old. Have you ever**
 2 **known anybody with dementia?**
 3 A. I know one or two people.
 4 **Q. And how old are they?**
 5 A. I could say the one person I know
 6 is 50 or 60.
 7 **Q. And how far along is their**
 8 **dementia?**
 9 A. I really don't keep up with him. I
 10 know him, when I see him I'm nice to him. I
 11 say, hello, how are you doing today. It
 12 doesn't look very well but, you know.
 13 **Q. Is he capable of managing his**
 14 **affairs?**
 15 A. Is he capable of what?
 16 **Q. Capable of managing his own**
 17 **affairs?**
 18 A. No.
 19 **Q. Would he be capable, for example,**
 20 **of getting on a plane and flying to a strange**
 21 **city?**
 22 MR. SCIOLLA: Objection, calls for
 23 speculation.
 24 A. No.
 25 **Q. Did the Chris Benoit that you knew**

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1 **before you left WWE strike you as an 85 year**
 2 **old with dementia?**
 3 A. No.
 4 **Q. No.**
 5 **And nobody who knew him would have**
 6 **thought he had dementia on a scale of an**
 7 **85 year old dementia, would they?**
 8 MR. SCIOLLA: Objection, calls for
 9 speculation.
 10 A. It wasn't even a thought.
 11 **Q. And so if somebody had said to you**
 12 **back in 2007 when Chris Benoit did what he**
 13 **did, "Vito, he's like an 85-year-old with**
 14 **dementia," what would you have said to that?**
 15 MR. SCIOLLA: Objection, calls for
 16 a hypothetical.
 17 A. I would say that it's a standard no
 18 way, I can't believe it. But that's I think
 19 everybody's reaction.
 20 **Q. And if you had said that, would you**
 21 **think you would be committing some kind of**
 22 **fraud by expressing your opinion that you**
 23 **didn't believe that?**
 24 MR. SCIOLLA: Objection, calls for
 25 speculation.

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1 A. You're talking like in general
 2 circles about your own opinion about
 3 different people. So I mean you know it's
 4 not about being any kind of thing like fraud,
 5 but it's what you think about that person.
 6 **Q. So that, in your mind, if you**
 7 **express your truthful opinion, based on your**
 8 **knowledge of Chris Benoit, no way; you don't**
 9 **think you're trying to deceive anybody.**
 10 **You're just expressing your opinion about**
 11 **what you knew about the man?**
 12 MR. SCIOLLA: Object to the form.
 13 **Q. Is that fair to say?**
 14 A. Fair, fair statement.
 15 **Q. Back in 2007, after Benoit, after**
 16 **the initial discovery of the murders, do you**
 17 **recall, there was a lot of discussion about**
 18 **whether that was associated with steroid**
 19 **rage?**
 20 A. That's what they said it was part
 21 of.
 22 **Q. Right after the murder.**
 23 **And did that concern you as a**
 24 **steroid user?**
 25 A. Well, when you are on steroids like

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1 that, you know, you do have these bits of
 2 rage. So I mean, it is possible.
 3 **Q. So did that make you more**
 4 **interested in the story as to whether or not**
 5 **that could have been the cause?**
 6 A. There's a difference between taking
 7 steroids and taking testosterone replacement.
 8 **Q. Understood.**
 9 A. So I mean when you are taking
 10 testosterone replacement, you are replacing
 11 testosterone because you have a deficiency.
 12 When you are taking steroids, you're taking
 13 them for other gains and goals.
 14 So when you are on a mild dose, you
 15 know, the effect of having those rages are
 16 very limited. You do get irritable. I'm not
 17 saying that. But they're much greater when
 18 you're actually taking steroids.
 19 **Q. But is the fact that steroids were**
 20 **put in play in this case something that made**
 21 **you more interested in the story?**
 22 A. No. Like I said -- like I said,
 23 you know, like him doing that and everything
 24 that happened, my interest of it was, okay,
 25 it's a shock value, but after that, it really