

Exhibit 1

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>	<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>	5

6	<p>1 -----EXHIBITS-----</p> <p>2 SINGLETON DESCRIPTION PAGE</p> <p>3 Exhibit 8 Adam Mercer @MercerWWE Twitter 135</p> <p>4 Tweets</p> <p>5 Exhibit 9 Adam Mercer @WWE Mercer Twitter 140</p> <p>6 Tweets</p> <p>7 Exhibit 10 Evan Singleton Talent 143</p> <p>8 Questionnaire</p> <p>9 Exhibit 11 World Wrestling Entertainment, 145</p> <p>10 Inc. Booking Contract</p> <p>11 Exhibit 12 Letter dated May 21, 2012 148</p> <p>12</p> <p>13 Exhibit 13 Candace Renshaw Facebook Page 150</p> <p>14 Exhibit 14 Class Action Complaint 159</p> <p>15 Exhibit 15 Plaintiffs' First Amended 183</p> <p>16 Complaint</p> <p>17 Exhibit 16 Plaintiffs' Second Amended 209</p> <p>18 Complaint</p> <p>19 Exhibit 17 Concussion Evaluation dated 219</p> <p>20 2/21/2013</p> <p>21 Exhibit 18 Followup Note on Evan Singleton 228</p> <p>22 dated January 18, 2013</p> <p>23 Exhibit 19 E-mail dated October 1, 2012 229</p> <p>24 Exhibit 20 Singleton vs. Erick Rowan 237</p> <p>25 6/17/2012 and 9/27/2012 CD</p>	8	<p>1 (Whereupon, on the video record.)</p> <p>2 THE VIDEOGRAPHER: We're now on the</p> <p>3 record.</p> <p>4 My name is Joseph Wills, the videographer</p> <p>5 from David Feldman Worldwide.</p> <p>6 This is a video deposition in the United</p> <p>7 States District Court for the District of</p> <p>8 Connecticut.</p> <p>9 Today's date is May 11, 2016. The video</p> <p>10 time is 9:29 a.m.</p> <p>11 This deposition is being held at 1650</p> <p>12 Market Street, Philadelphia, Pennsylvania, in</p> <p>13 the matters of McCullough, et al. versus World</p> <p>14 Wrestling Entertainment, Incorporated, and</p> <p>15 Singleton and LoGrasso versus World Wrestling</p> <p>16 Entertainment, Incorporated.</p> <p>17 The deponent is Evan Singleton.</p> <p>18 Would all counsel please identify</p> <p>19 themselves.</p> <p>20 MR. McDEVITT: I'm Jerry McDevitt. I</p> <p>21 represent WWE.</p> <p>22 MR. POGUST: Harris Pogust, Pogust</p> <p>23 Braslow & Millroad, on behalf of the</p> <p>24 plaintiffs.</p> <p>25 MR. KYROS: Konstantine Kyros, Kyros Law,</p>
7	<p>1 -----EXHIBITS-----</p> <p>2 SINGLETON DESCRIPTION PAGE</p> <p>3 Exhibit 21 Singleton Leg Twitching CD 249</p> <p>4 Exhibit 22 Evan Singleton Instagram Account 249</p> <p>5 Page</p> <p>6 Exhibit 23 Evan Singleton Instagram Account 252</p> <p>7 Page</p> <p>8 Exhibit 24 Evan Singleton Instagram Account 256</p> <p>9 Page</p> <p>10 Exhibit 25 Evan Singleton Instagram Account 258</p> <p>11 Page</p> <p>12 Exhibit 26 Evan Singleton Instagram Account 259</p> <p>13 Page</p> <p>14 Exhibit 27 Evan Singleton Facebook Account 263</p> <p>15 Page</p> <p>16 Exhibit 28 Evan Singleton Instagram Account 265</p> <p>17 Page Photograph</p> <p>18 Exhibit 29 Evan Singleton Instagram Account 268</p> <p>19 Page</p> <p>20 Exhibit 30 Evan Singleton Instagram Account 268</p> <p>21 Page</p> <p>22 Exhibit 31 Evan Singleton Instagram Account 270</p> <p>23 Page</p> <p>24 Exhibit 32 Multiple Photographs 271</p> <p>25 Exhibit 33 CD 274</p>	9	<p>1 on behalf of the plaintiffs.</p> <p>2 THE VIDEOGRAPHER: Will the court</p> <p>3 reporter please swear in the witness.</p> <p>4 E V A N M. S I N G L E T O N, the witness, having</p> <p>5 been duly sworn, was examined and testified</p> <p>6 under oath as follows:</p> <p>7 EXAMINATION BY</p> <p>8 MR. McDEVITT:</p> <p>9 Q. Mr. Singleton, my name is Jerry McDevitt.</p> <p>10 I represent the WWE, so I'll be asking you questions</p> <p>11 today.</p> <p>12 A. Okay.</p> <p>13 Q. And I'd like to begin by asking you to</p> <p>14 state formally your name and address.</p> <p>15 A. My name is Evan Mitchell Singleton. My</p> <p>16 address is 5201 Summerfield Drive, Mount Joy,</p> <p>17 Pennsylvania 17552.</p> <p>18 Q. How far is Mount Joy from here?</p> <p>19 A. About an hour and a half.</p> <p>20 Q. Is that a small town?</p> <p>21 A. Uhm... little bit, yes.</p> <p>22 Q. How many people live there?</p> <p>23 A. I don't know offhand.</p> <p>24 Q. You the biggest guy in town?</p> <p>25 A. If not, I'm pretty close.</p>

38	<p>1 A. Yeah.</p> <p>2 Q. And you go down and you sign a contract</p> <p>3 with WWE, correct?</p> <p>4 A. Yes, sir.</p> <p>5 Q. And in that contract you indicated that</p> <p>6 you agreed to the proposition that wrestling had</p> <p>7 inherent risk and that you accepted those risks,</p> <p>8 correct?</p> <p>9 A. Yes.</p> <p>10 Q. And you promised in that contract that</p> <p>11 you would not try to hold WWE responsible if you got</p> <p>12 injured because of those risks, correct?</p> <p>13 A. Yes.</p> <p>14 Q. And you got injured doing exactly what</p> <p>15 you signed up to do, didn't you?</p> <p>16 A. Yes.</p> <p>17 Q. And yet you're suing WWE, correct?</p> <p>18 A. Yes.</p> <p>19 Q. Why is that?</p> <p>20 A. I don't know.</p> <p>21 Q. You don't know why you're suing WWE?</p> <p>22 Have you been promised any money for</p> <p>23 suing WWE?</p> <p>24 A. No.</p> <p>25 Q. Have you been given any money for suing</p>	40	<p>1 men?</p> <p>2 A. No.</p> <p>3 Q. And all of those men went through the</p> <p>4 same program you went through, right?</p> <p>5 A. Yes.</p> <p>6 Q. And they made it and you didn't, right?</p> <p>7 A. Yes.</p> <p>8 Q. Why do you think that is?</p> <p>9 A. I don't know.</p> <p>10 Q. Do you think they wanted it more than you</p> <p>11 did?</p> <p>12 A. No.</p> <p>13 Q. Do you think they were better than you?</p> <p>14 A. No.</p> <p>15 Q. Do you think they were tougher than you?</p> <p>16 A. No.</p> <p>17 Q. But they made it and you didn't, right?</p> <p>18 A. Yes.</p> <p>19 Q. And after you got -- or, strike that.</p> <p>20 You claim that you got injured on</p> <p>21 September 27, 2012, right?</p> <p>22 A. Yes.</p> <p>23 Q. And you claim you got a concussion that</p> <p>24 day, right?</p> <p>25 A. Yes.</p>
39	<p>1 WWE?</p> <p>2 A. No.</p> <p>3 Q. When you went down to WWE -- when I say</p> <p>4 WWE, you were actually working with FCW for a while</p> <p>5 and then NXT, correct?</p> <p>6 A. Yes.</p> <p>7 Q. And those are, for lack of a better word,</p> <p>8 the minor leagues, right?</p> <p>9 A. Yes.</p> <p>10 Q. And the object of everybody who goes down</p> <p>11 there is to get good enough to make it to the WWE</p> <p>12 main roster, correct?</p> <p>13 A. Yes.</p> <p>14 Q. That's what you wanted to do when you</p> <p>15 went there, wasn't it?</p> <p>16 A. Yes.</p> <p>17 Q. Who were some of the people that you</p> <p>18 worked with down there that have since made the main</p> <p>19 roster?</p> <p>20 A. I don't know all of them because I don't</p> <p>21 follow it anymore. I know Big E Langston is on the</p> <p>22 main roster now. Erick Rowan is on the roster. Bray</p> <p>23 Wyatt is on the main roster. To the best of my</p> <p>24 knowledge, that's all I know.</p> <p>25 Q. Do you stay in contact with any of those</p>	41	<p>1 Q. And after you got that concussion, am I</p> <p>2 correct that the WWE sent you to various doctors to</p> <p>3 see if they could find out what was wrong with you?</p> <p>4 A. Yes.</p> <p>5 Q. How many doctors did they send you to?</p> <p>6 A. I don't remember all of them.</p> <p>7 Q. Multiple neurologists, correct?</p> <p>8 A. Yes.</p> <p>9 Q. Neuropsychologists, correct?</p> <p>10 A. Yes.</p> <p>11 Q. Epilepsy specialists?</p> <p>12 A. Yes.</p> <p>13 Q. Do you remember Dr. Greenberg?</p> <p>14 A. No.</p> <p>15 Q. You don't remember a neurologist by the</p> <p>16 name of Greenberg you treated with down in Florida</p> <p>17 that cleared you to go back and participate?</p> <p>18 A. No.</p> <p>19 Q. Do you recall him telling you the results</p> <p>20 of MRIs?</p> <p>21 A. No.</p> <p>22 Q. How many MRIs have been done on your</p> <p>23 brain to date?</p> <p>24 A. I don't remember.</p> <p>25 Q. Do you remember any of them that have</p>

162	<p>1 A. What happened to me wasn't right.</p> <p>2 Q. Wasn't right in what way?</p> <p>3 A. How I was treated.</p> <p>4 Q. And how were you mistreated?</p> <p>5 A. Well, I was bullied by Bill DeMott and</p> <p>6 staff. It took a while before I had any kind of real</p> <p>7 medical attention given to me. Just things of that</p> <p>8 nature.</p> <p>9 Q. Anything else?</p> <p>10 A. Off the top of my head, no.</p> <p>11 Q. Not off the top of your head, you brought</p> <p>12 the lawsuit and I want to know every reason what you</p> <p>13 think your claim is here.</p> <p>14 A. Off the top of my head, that's all I --</p> <p>15 that's all I have off the top of my head.</p> <p>16 Q. Did WWE intentionally cause you to be</p> <p>17 injured when you did the move with the performer on</p> <p>18 September 27th that injured you?</p> <p>19 A. I'm sorry?</p> <p>20 Q. Strike that.</p> <p>21 You acknowledge, I take it, that you were</p> <p>22 injured by an accident, correct?</p> <p>23 A. Yes.</p> <p>24 Q. You don't think anybody deliberately</p> <p>25 tried to injure you, do you?</p>	164	<p>1 A. The first MRI I got was like a month</p> <p>2 later.</p> <p>3 Q. Well, before MRIs, did you have medical</p> <p>4 attention?</p> <p>5 A. I was going back to the training facility</p> <p>6 to meet with the on-site trainer. That's the extent</p> <p>7 of my medical treatment.</p> <p>8 Q. Do you realize you're claiming fraud in</p> <p>9 this case?</p> <p>10 A. No.</p> <p>11 Q. You don't realize you're making a fraud</p> <p>12 claim?</p> <p>13 A. No.</p> <p>14 Q. Can you tell me who you think, if</p> <p>15 anybody, committed a fraud on you?</p> <p>16 A. I'm sorry?</p> <p>17 Q. Who do you think, if anybody, at WWE</p> <p>18 committed a fraud on you?</p> <p>19 A. I don't know.</p> <p>20 Q. Did anybody at WWE fail to tell you</p> <p>21 something that you think you should have known?</p> <p>22 A. I don't know.</p> <p>23 Q. Did anybody tell you to go back in the</p> <p>24 ring and perform despite the fact that your head was</p> <p>25 injured?</p>
163	<p>1 A. When performing the choke slam, you're</p> <p>2 supposed to fall. When you're the one getting</p> <p>3 slammed, you're supposed to fall. I felt there was a</p> <p>4 little bit more force behind it than just a fall, but</p> <p>5 still an accident nonetheless.</p> <p>6 Q. Right. And the kind of thing that you</p> <p>7 knew from the minute you walked in the ring those</p> <p>8 kind of things can happen, right?</p> <p>9 A. Not this serious.</p> <p>10 Q. You didn't think you could get a serious</p> <p>11 concussion?</p> <p>12 A. Not this bad, no.</p> <p>13 Q. But you realized you could hit your head</p> <p>14 and get injured?</p> <p>15 A. Yes.</p> <p>16 Q. Now, you say it took a while to get</p> <p>17 medical attention. Isn't it true that you were told</p> <p>18 to go home and rest?</p> <p>19 A. Yes.</p> <p>20 Q. And then you were seen by Dr. Amann?</p> <p>21 A. I guess, I don't know.</p> <p>22 Q. You don't know?</p> <p>23 A. I don't remember.</p> <p>24 Q. Well, how long did it take you to get</p> <p>25 medical attention?</p>	165	<p>1 A. I don't remember.</p> <p>2 Q. Well, you'd know if somebody told you to</p> <p>3 go back in the ring. I mean, you already testified</p> <p>4 that nobody sent you back into the ring after your</p> <p>5 injury, right?</p> <p>6 A. Yeah.</p> <p>7 Q. And do you think that was the correct and</p> <p>8 right thing for them to do given what you were</p> <p>9 reporting as your symptoms?</p> <p>10 A. Yes.</p> <p>11 Q. And for two years they paid for that,</p> <p>12 right?</p> <p>13 A. Yes.</p> <p>14 Q. So, as you sit here today, you can't</p> <p>15 identify a single act or anything done or not done by</p> <p>16 WWE that you consider to be fraudulent to you?</p> <p>17 A. I don't know.</p> <p>18 Q. Well, you're the one who is bringing that</p> <p>19 lawsuit, sir, so I'm asking you: Do you have</p> <p>20 anything that you considered that was done that was</p> <p>21 fraudulent to you?</p> <p>22 A. I don't know.</p> <p>23 Q. Do you -- did you like Dr. Amann?</p> <p>24 A. From what I remember, he was okay, I</p> <p>25 guess.</p>