

Exhibit 11

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.

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EVAN SINGLETON and VITO LOGRASSO,

Plaintiffs,

vs.

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

WORLD WRESTLING ENTERTAINMENT, INC.,

Defendant.

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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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<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>
<p>May 18, 2016 9:35 a.m.</p> <p>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.</p>	<p>A P P E A R A N C E S (Cont.d):</p> <p>Attorneys for Defendant K&L GATES, LLP 210 Sixth Avenue Pittsburgh, Pennsylvania 15222 BY: JERRY McDEVITT, ESQ. jerry.mcdevitt@klgates.com STEFANIE M. LACY, ESQ. stefanie.lacy@klgates.com</p> <p>ALSO PRESENT: JOSEPH WILLS, Videographer</p>
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<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>
<p>A P P E A R A N C E S:</p> <p>Attorneys for Plaintiff Vito LoGrasso POGUST BRASLOW MILLROOD, LLC Eight Tower Bridge 161 Washington St., Suite 1520 Conshohocken, Pennsylvania 19428 BY: ANDREW J. SCIOLLA, ESQ. asciolla@pbmattorneys.com</p> <p>Attorneys for Plaintiff Vito LoGrasso KYROS LAW OFFICES 17 Miles Road Hingham, Massachusetts 02043 BY: KONSTANTINE W. KYROS, ESQ. kon@kyroslaw.com ANTHONY NORRIS, ESQ.</p>	<p>THE VIDEOGRAPHER: 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.</p>

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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 V I T O J. L O G R A S S O, 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?**

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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?**

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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

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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**

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1 **medical attention from your own personal**
 2 **doctor for these matters?**
 3 A. Because I was also being treated by
 4 Dr. Rios.
 5 **Q. You've sworn under oath in the**
 6 **Answers to Interrogatories here that you**
 7 **never told Dr. Rios about any head injuries;**
 8 **is that true?**
 9 A. I told him I had headaches, I was
 10 feeling woozy. I told him that I was
 11 lethargic, tired from being on the road; and
 12 that's when he submitted and gave me
 13 B-12 shots.
 14 **Q. Did you ever tell him that you**
 15 **thought you sustained a concussion or a head**
 16 **injury in a specific match?**
 17 A. I never told Dr. Rios that I had a
 18 concussion.
 19 **Q. Did you ever tell him, doctor, in a**
 20 **match that just occurred, I think I hurt my**
 21 **head?**
 22 A. I told him that when I came back
 23 from a match that I needed to collect myself
 24 and that I was feeling a little woozy and I
 25 had a welt on my stomach, if I'm interpreting

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1 one particular time and that I wasn't, you
 2 know, I wasn't feeling right and I just
 3 needed to take a shower just to cool off.
 4 **Q. You told him you needed to take a**
 5 **shower, you needed to take a shower to cool**
 6 **off?**
 7 A. Yeah.
 8 **Q. But I'm being very specific here.**
 9 **I want to make sure I understand.**
 10 **Did you ever go to Dr. Rios and**
 11 **say, doctor, I hit my head on something**
 12 **during that fight, and I think I'm hurt, and**
 13 **have him examine you for a specific head**
 14 **injury that you reported to him?**
 15 A. No, sir, I did not.
 16 **Q. Including the one where you say**
 17 **Steve Regal threw you into the steps?**
 18 A. That's when I went back to him,
 19 after the match; and when I went back, he
 20 attended to me, because I had a lump on my
 21 stomach. And he saw that I was a little, a
 22 little out of it and sweating a lot; and I
 23 said that I needed to take a shower just to
 24 cool down, then he attended to my stomach
 25 afterwards.

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1 **Q. Did somebody point out to you, in**
 2 **connection with coming in here today, that**
 3 **you did go see the doctor after that event**
 4 **with Steven Regal, but you just didn't bother**
 5 **to report a head injury, you reported a**
 6 **problem with your stomach?**
 7 MR. SCIOLLA: Object to the form.
 8 I'm going to -- are you asking about
 9 what he discussed with his attorneys?
 10 MR. McDEVITT: I'm asking him if
 11 somebody pointed that out to him, yes.
 12 MR. SCIOLLA: Including his
 13 attorneys?
 14 MR. McDEVITT: Yes.
 15 MR. SCIOLLA: So you're asking for
 16 an attorney-client privileged
 17 communication?
 18 MR. McDEVITT: I'm asking -- I'm
 19 entitled to anything that refreshed his
 20 recollection for his testimony today.
 21 MR. SCIOLLA: That wasn't what your
 22 question was.
 23 MR. McDEVITT: Let's try it this
 24 way:
 25 **Q. Did you look at Dr. Rios' notes in**

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1 **connection with preparing for your testimony**
 2 **today?**
 3 A. No, sir, I didn't.
 4 **Q. Was it pointed out to you that you**
 5 **didn't report a head injury to Dr. Rios, but**
 6 **you reported some other thing to Dr. Rios?**
 7 MR. SCIOLLA: I am going to object
 8 to the form. And to the extent he's
 9 talking about attorney-client
 10 communications, I don't want you to
 11 answer.
 12 MR. McDEVITT: Well, which
 13 attorney? Which attorney-client --
 14 which attorney are we talking about
 15 privilege here?
 16 MR. SCIOLLA: Any of the ones that
 17 he --
 18 MR. McDEVITT: Well, it's not any.
 19 Which attorney specifically had that
 20 communication you're claiming the
 21 privilege with? I'm entitled to know
 22 the name of the attorney.
 23 MR. SCIOLLA: Any of the attorneys
 24 he mentioned that he prepared for his
 25 deposition.