Case 3:15-cv-01074-VLB Document 158-11 Filed 05/27/16 Page 1 of 5

## Exhibit 11

1 UNITED STATES DISTRICT COURT DISTRICT OF CONNECTICUT -----x RUSS MCCULLOUGH, et al., Plaintiff, No. 3:15-cv-01074 (VLB) vs. WORLD WRESTLING ENTERTAINMENT, INC., Defendant. -----x EVAN SINGLETON and VITO LOGRASSO, Plaintiffs, No. 3:15-cv-00425 (VLB) vs. 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

2   4     1   A P P E A R A N C E S (Cont.d):     2   3     4   4     5   5     6   6     7   Kakl GATES, LLP     6   210 Sixth Avenue     7   7     8   May 18, 2016     9   9:35 a.m.     9   9:35 a.m.     10   Videotaped Deposition of VITO     11   Videotaped Deposition of VITO     12   LOGRASSO, held at the offices of     13   Kleinbard, LLC, 1650 Market Street,     14   Philadlephia, Pennsylvania, pursuate to     15   notice, before Jennifer Ocampo-Guzman,     16   a Certifieal Real-Time Shorthand     16   a Commonwealth of Pennsylvania.     19   10     21   22     22   21     23   23     24   24     25   25     26   27     27   3     28   29     29   21     22   22     23   23     24   24     25   25     26   26     27   10     28   27 <				-
2     3       3     4       5     3       4     4       5     K&L GATES, LLP       6     6       7     Pittsburgh, Pennsylvania 15222       8     May 18, 2016       9     9:35 a.m.       10     Videotaped Deposition of VITO       12     LOGRASSO, held at the offices of       13     Kleinbard, LLC, 1650 Market Street,       14     Philadelphia, Pennsylvania, pursuant to       15     notice, before Jennifer Ocampo-Guzman,       16     Cormmonwealth of Pennsylvania.       19     20       21     21       22     22       23     24       24     24       25     25       26     26       27     2       28     25       29     20       21     21       22     22       23     24       24     24       25     25       26     26       27     1       38     Consh		2	2	4
2     3       3     4       5     3       4     4       5     K&L GATES, LLP       6     6       7     Pittsburgh, Pennsylvania 15222       8     May 18, 2016       9     9:35 a.m.       10     Videotaped Deposition of VITO       12     LOGRASSO, held at the offices of       13     Kleinbard, LLC, 1650 Market Street,       14     Philadelphia, Pennsylvania, pursuant to       15     notice, before Jennifer Ocampo-Guzman,       16     Cormmonwealth of Pennsylvania,       19     20       21     21       22     22       23     24       24     24       25     25       3     THE VIDEOGRAPHER: We are now on       1     A P P E A R A N C E S:       2     1       3     Marmey S for Plaintiff Vito LoGrasso       5     POGUST BRASLOW MILLROOD, LLC       6     1       7     161 Washington St., Suite 1520       7     161 Washington St., Suite 1520       8     Conshohocken,	1		1	A P P E A R A N C E S (Cont d)
3     3       4     4       5     5       6     6       7     7       8     May 18, 2016       9     9:35 a.m.       9     9:35 a.m.       10     10       11     Videotaped Deposition of VITO       12     LOGRASSO, held at the offices of       13     Kleinbard, LLC, 1650 Market Street,       14     Philadelphia, Pennsylvania, pursuant to       15     notice, before Jennifer Ocampo-Guzman,       16     a. Certified Real-Time Shorthand       17     Reporter and Notary Public of the       18     Commonwealth of Pennsylvania.       19     20       21     21       22     22       23     23       24     24       25     25       7     14 RYP E A R A N C E S:     1       1     THE VIDEOGRAPHER: We are now on       2     22       23     23       24     24       25     25       7     16 Washington St, Suite I520     7       <				
4     Attorneys for Defendant       5     Kal, GATES, LLP       6     210 Sixth Avenue       7     Pritsburgh, Pennsylvania 15222       8     May 18, 2016     8       9     9:35 a.m.     9       10     Videotaped Deposition of VITO     1       11     Videotaped Deposition of VITO     1       12     LOGRASSO, held at the offices of     12       13     Kleinbard, LLC, 1650 Market Street,     13       14     Priladelphia, Pennsylvania, pursuant to     16       15     notice, before Jennifer Ocampo-Guzman,     15       16     a Certified Real-Time Shorthand     16       17     Reporter and Notary Public of the     17       18     Commonwealth of Pennsylvania.     18       19     20     20       21     21     22       22     23     24       24     24     24       25     25     25       1     THE VIDEOGRAPHER: We are now on     the record.       3     My name is Joseph Wills, the     videoteposition       4     Atorneys for Plaintiff Vito L				
5     K&L GATES, LLP       6     210 Sixth Avenue       7     May 18, 2016       8     May 18, 2016       9     9:35 a.m.       10     STEFANIE M. LACY, ESQ.       11     Videotaped Deposition of VITO       12     LOGRASSO, held at the offices of       13     Kleinbard, LLC, 1650 Market Street,       14     Philadelphia, Pennsylvania, pursuant to       15     notice, before Jennifer Ocampo-Guzman,       16     a Certified Real-Time Shorthand       17     Reporter and Notary Public of the       18     Commonwealth of Pennsylvania.       19     20       20     21       21     21       22     22       23     24       24     24       25     25       26     25       27     21       3     My name is Joseph Wills, the       4     vidoegrapher obtained by David Feldman       5     DOST BRASLOW MILLROOD, LLC       6     for the United States District Court for       7     161 Washington St, Suit 1520     7				Attorneys for Defendant
6     210 Sitch Avenue       7     Pittsburgh, Pennsylvania 15222       8     May 18, 2016       9     9:35 a.m.       10     STEFANIE M. LACY, ESQ.       11     Videotaped Deposition of VITO       12     LOGRASSO, held at the offices of       13     Kleinbard, LLC, 1650 Market Street,       14     Philadelphia, Pennsylvania, pursuant to       15     notice, before Jennifer Ocampo-Guzman,       16     Commonwealth of Pennsylvania.       18     Commonwealth of Pennsylvania.       19     19       20     20       21     21       22     22       23     24       24     24       25     25       3     THE VIDEOGRAPHER: We are now on       4     Atorneys for Plaintiff Vito LoGrasso       5     1     THE VIDEOGRAPHER: We are now on       4     Atorneys for Plaintiff Vito LoGrasso       7     the record.       3     My name is Joseph Wills, the       4     videographer obtained by David Feldman       6     Eight Tower Bridge       7 <td< td=""><td></td><td></td><td></td><td></td></td<>				
7     Pittsburgh, Pennsylvania 15222       8     May 18, 2016     8       9     9:35 a.m.     9       10     10     STEFANIE M. LACY, ESQ.       11     Videotaped Deposition of VITO     11       12     LOGRASSO, held at the offices of     12       13     Kleinbard, LLC, 1650 Market Street,     13       14     Philadelphia, Pennsylvania, pursuant to     14       15     notice, before Jennifer Ocampo-Guzman,     15       16     a Certified Real-Time Shorthand     16       17     Reporter and Notary Public of the     17       18     Commonwealth of Pennsylvania.     19       20     20     21       21     21     22       22     22     22       23     23     23       24     24     24        25     25     5       3     THE VIDEOGRAPHER: We are now on       2     24     24       25     25     26       26     25     27       3     THE VIDEOGRAPHER: We are now on       4 <td< td=""><td></td><td></td><td></td><td></td></td<>				
8     May 18, 2016     8     BY: LÉRRY McDEVITT, ESQ.       9     9:35 a.m.     9     jerry.mcdevitt@klgates.com       10     STEFANIE M. LACY, ESQ.       11     Videotaped Deposition of VITO     11     stefanie.lacy@klgates.com       12     LOGRASSO, held at the offices of     12       13     Kleinbard, LLC, 1650 Market Street,     13       14     Philadelphia, Pennsylvania, pursuant to     14       15     notice, before Jennifer Ocampo-Guzman,     15       16     a Certified Real-Time Shorthand     16       17     Reporter and Notary Public of the     17       18     Commonwealth of Pennsylvania.     18       19     20     20       21     21     22       22     23     24       24     24     24       25     25     25       3     THE VIDEOGRAPHER: We are now on     1       2     2     23       24     24     24       25     25     1       4     Attorneys for Plaintiff Vito LoGrasso     5       7     16 Il Washington, St				
9     9:35 a.m.     9     jerry.mcdevitt@klgates.com       10     10     STEFANIE M. LACY, ESQ.       11     Videotaped Deposition of VITO     11     stefanie.lacy@klgates.com       12     LOGRASSO, held at the offices of     12       13     Kleinbard, LLC, 1650 Market Street,     13       14     Philadelphia, Pennsylvania, pursuant to     14       15     notice, before Jennifer Ocampo-Guzman,     15       16     a Certified Real-Time Shorthand     16       17     Reporter and Notary Public of the     17       18     Commonwealth of Pennsylvania.     18       19     20     20       21     21     21       22     23     23       24     24     24       25     25     5       11     A P P E A R A N C E S:     1     THE VIDEOGRAPHER: We are now on       2     21     22     23       23     3     5     Worldwide. This is a video deposition       5     POGUST BRASLOW MILLRODD, LLC     5     Worldwide. This is a video deposition       6     for the United States District Court for <td></td> <td>May 18, 2016</td> <td></td> <td></td>		May 18, 2016		
10     10     STEFANIE M. LACY, ESQ.       11     Videotaped Deposition of VITO     11     stefanie.lacy@klgates.com       12     LOGRASSO, held at the offices of     12       13     Kleinbard, LLC, 1650 Market Street,     13       14     Philadelphia, Pennsylvania, pursuant to     14       15     notice, before Jennifer Ocampo-Guzman,     15       16     a Certified Real-Time Shorthand     16       17     Reporter and Notary Public of the     17       18     Commonwealth of Pennsylvania.     18       19     20     20       21     21     22       22     22     22       23     24     24       24     24     24       25     25     25       3     THE VIDEOGRAPHER: We are now on     the record.       3     My name is Joseph Wills, the     videographer obtained by David Feldman       4     Attomeys for Plaintiff Vito LoGrasso     5     Worldwide. This is a video deposition       5     POGUST BRASLOW MILLROOD,LLC     6     for the United States District Court for       6     Hot Washington St., Suite 1520				
1     Videotaped Deposition of VITO     11     stefanie.lacy@ktgates.com       12     LOGRASSO, held at the offices of     12       14     Philadelphia, Pennsylvania, pursuant to     14       15     notice, before Jennifer Ocampo-Guzman,     15       16     a Certified Real-Time Shorthand     16       17     Reporter and Notary Public of the     17       18     Commonwealth of Pennsylvania.     18       19     20     20       21     21     22       22     22     23       23     23     23       24     24     24       25     25     25       3     THE VIDEOGRAPHER: We are now on     2       2     2     23       3     Yorddwide. This is a video deposition     5       6     FOGUST BRASLOW MILLROOD, LLC     6     for the United States District Court for       7     161 Washington St., Suite 1520     7     the District of Connecticut. Today's       8     date is May 18, 2016, and the video time     is 9:35 a.m.       10     asciolla@pbmattorneys.com     10     This deposition is being held a		<i>7.00</i> u.m.		
12     LOGRASSÖ, held at the offices of Kleinbard, LLC, 1650 Market Street,     12       13     Philidalelphia, pursuant to notice, before Jennifer Ocampo-Guzman,     14       15     notice, before Jennifer Ocampo-Guzman,     15       16     a Certified Real-Time Shorthand     16       17     Reporter and Notary Public of the     17       18     Commonwealth of Pennsylvania.     18       19     19     20       20     21     21       22     22     22       23     24     24       24     24     24       25     25     25       1     A P P E A R A N C E S:     1     THE VIDEOGRAPHER: We are now on       2     2     2     2       3     A torneys for Plaintiff Vito LoGrasso     5     My name is Joseph Wills, the       4     Attorneys for Plaintiff Vito LoGrasso     5     Mord wide. This is a vide deposition       5     BC Conshohocken, Pennsylvania 19428     8     date is May 18, 2016, and the video time       9     BY: ANDREW J. SCIOLLA, ESQ.     9     is 9:35 a.m.     16       14     KYROS LAW OFFICES		Videotaped Deposition of VITO	-	
13     Kleinbard, LLC, 1650 Market Street,     13       14     Philadelphia, Pennsylvania, pursuant to     14       15     notice, before Jennifer Ocampo-Guzman,     15       16     a Certified Real-Time Shorthand     16       17     Reporter and Notary Public of the     17       18     Commonwealth of Pennsylvania.     19       19     19     19       20     20     21       21     21     22       23     23     23       24     24     24       25     25     5       1     A P P E A R A N C E S:     1     THE VIDEOGRAPHER: We are now on       2     2     2     2       3     3     7     5       1     A torneys for Plaintiff Vito LoGrasso     4     Worldwide. This is a video deposition       5     POGUST BRASLOW MILLROOD, LLC     5     Worldwide. This is a video deposition       6     Fight Tower Bridge     7     the District of Connecticut. Today's       8     Canshokcken, Pennsylvania 19428     8     date is May 18, 2016, and the video time       9     BY. ANDREW J.				storanio nacy c kigatos.com
14     Philadelphia, Pennsylvania, pursuant to notice, before Jennifer Ocampo-Guzman, a Certified Real-Time Shorthand     14     ALSO PRESENT: JOSEPH WILLS, Videographer       16     a Certified Real-Time Shorthand     16       17     Reporter and Notary Public of the     17       18     Commonwealth of Pennsylvania.     18       19     19     20       20     21     21       21     22     22       23     23     24       24     24     24       25     25     5       3     THE VIDEOGRAPHER: We are now on     2       2     16     THE VIDEOGRAPHER: We are now on     2       3     3     My name is Joseph Wills, the     4       4     Attorneys for Plaintiff Vito LoGrasso     4     videographer obtained by David Feldman       5     POGUST BRASLOW MILLROOD, LLC     5     Worldwide. This is a video deposition       6     for the United States District Court for     16     for the United States District Court for       7     161 Washington St., Suite 1520     7     the District of Connecticut. Today's       8     Conshohocken, Pensylvania 19428     8		-		
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16     a Certified Real-Time Shorthand     16       17     Reporter and Notary Public of the     17       18     Commonwealth of Pennsylvania.     18       19     19     20       20     20     21       21     21     21       22     23     23       24     24       25     25       3     1     THE VIDEOGRAPHER: We are now on       2     2     2       3     1     THE VIDEOGRAPHER: We are now on       4     Attorneys for Plaintiff Vito LoGrasso     4       5     POGUST BRASLOW MILLROOD, LLC     5     Worldwide. This is a video deposition       6     Fight Tower Bridge     6     for the United States District Court for       7     161 Washington St., Suite 1520     7     the District of Connecticut. Today's       8     Conshohocken, Pennsylvania 19428     8     date is May 18, 2016, and the video time       19     BY: ANDREW J. SCIOLLA, ESQ.     9     is 9:35 a.m.       10     asciolla@pbmattorneys.com     10     This deposition is being held at       11     1650 Market Street, Philadelphia,				
17     Reporter and Notary Public of the     17       18     Commonwealth of Pennsylvania.     18       19     19       20     20       21     21       22     22       23     23       24     24       25     25       3     7       5     1       7     A P P E A R A N C E S:     1       1     A P P E A R A N C E S:     1       2     24     24       2     25     25       3     7     5       1     A P P E A R A N C E S:     1       1     THE VIDEOGRAPHER: We are now on       2     4     24       2     25     25       3     7     16       4     Attorneys for Plaintiff Vito LoGrasso     4       5     POGUST BRASLOW MILLROOD, LLC     5       6     Eight Tower Bridge     6     for the United States District Court for       7     161 Washington St., Suite 1520     7     the District of Connecticut. Today's       8     Conshohocken, Pennsylv				JOSEI II WIELS, Videographer
18     Commonwealth of Pennsylvania.     18       19     19       20     20       21     21       22     23       23     23       24     24       25     25       3     THE VIDEOGRAPHER: We are now on       2     1       3     My name is Joseph Wills, the       4     Attorneys for Plaintiff Vito LoGrasso       5     POGUST BRASLOW MILLROOD, LLC       6     Eight Tower Bridge       7     161 Washington St., Suite 1520       8     Consohooken, Pennsylvania 19428       9     BY: ANDREW J. SCIOLLA, ESQ.       9     BY: ANDREW J. SCIOLLA, ESQ.       11     1650 Market Street, Philadelphia,       12     Pennsylvania, in the matters of       13     Attorneys for Plaintiff Vito LoGrasso       14     KYROS LAW OFFICES     14       14     KYROS LAW OFFICES     14       15     17 Miles Road     15       16     Hingham, Massachusetts 02043     16       16     Hingham, Massachusetts 02043     16       16     Hingham, Massach				
19     19       20     20       21     21       22     21       23     23       24     24       25     25       3     7       5     7       1     A P P E A R A N C E S:       2     1       4     Attorneys for Plaintiff Vito LoGrasso       5     POGUST BRASLOW MILLROOD, LLC       6     Eight Tower Bridge       7     161 Washington St., Suite 1520       8     Conshohocken, Pennsylvania 19428       9     BY: ANDREW J. SCIOLLA, ESQ.       9     BY: ANDREW J. SCIOLLA, ESQ.       9     BY: ANDREW J. SCIOLLA, ESQ.       10     asciolla@pbmattorneys.com       10     asciolla@pbmattorneys.com       11     1650 Market Street, Philadelphia,       12     Pennsylvania, in the matters of       13     Attorneys for Plaintiff Vito LoGrasso       14     KYROS LAW OFFICES       14     KYROS LAW OFFICES       14     KYROS LAW OFFICES       14     Kon@kyroslaw.com       15     17 Miles Road     15   <				
20     20       21     21       22     23       23     23       24     24       25     25       3     5       1     A P P E A R A N C E S:       2     1       3     My name is Joseph Wills, the       4     Attorneys for Plaintiff Vito LoGrasso       5     POGUST BRASLOW MILLROOD, LLC       6     Eight Tower Bridge       7     161 Washington St., Suite 1520       8     Conshohocken, Pennsylvania 19428       9     BY: ANDREW J. SCIOLLA, ESQ.       9     BY: ANDREW J. SCIOLLA, ESQ.       10     asciolla@pbmattorneys.com       11     1650 Market Street, Philadelphia,       12     12       13     Attorneys for Plaintiff Vito LoGrasso       13     Attorneys for Plaintiff Vito LoGrasso       14     KYROS LAW OFFICES       15     17 Miles Road       15     17 Miles Road       16     Hingham, Massachusetts 02043       16     Hingham, Massachusetts 02043       17     BY: KONSTANTINE W. KYROS, ESQ.       18 <t< td=""><td></td><td>Commonwealth of FemilyFvana.</td><td></td><td></td></t<>		Commonwealth of FemilyFvana.		
21     21       22     23       23     24       25     25       3     7       1     A P P E A R A N C E S:       2     1       3     2       4     Attorneys for Plaintiff Vito LoGrasso       5     POGUST BRASLOW MILLROOD, LLC       6     Eight Tower Bridge       7     161 Washington St., Suite 1520       8     Conshohocken, Pennsylvania 19428       9     BY: ANDREW J. SCIOLLA, ESQ.       9     BY: ANDREW J. SCIOLLA, ESQ.       9     BY: ANDREW J. SCIOLLA, ESQ.       10     asciolla@pbmattorneys.com       11     1650 Market Street, Philadelphia,       12     2       13     Attorneys for Plaintiff Vito LoGrasso       14     KYROS LAW OFFICES       14     KYROS LAW OFFICES       15     17 Miles Road       15     Singleton and LoGrasso versus World       16     Hingham, Massachusetts 02043       16     Hingham, Massachusetts 02043       16     Hingham, Massachusetts 02043       17     The deponent is Vito LoGrasso.				
22     23       24     23       25     25       3     5       1     A P P E A R A N C E S:     1       2     the record.     3       3     4     Attorneys for Plaintiff Vito LoGrasso     5       5     POGUST BRASLOW MILLROOD, LLC     5     Worldwide. This is a video deposition       6     Eight Tower Bridge     6     for the United States District Court for       7     161 Washington St., Suite 1520     7     the District of Connecticut. Today's       8     Conshohocken, Pennsylvania 19428     9     is 9:35 a.m.       10     asciolla@pbmattorneys.com     10     This deposition is being held at       11     1650 Market Street, Philadelphia,     12       12     Pennsylvania, in the matters of     13       13     Attorneys for Plaintiff Vito LoGrasso     13     McCullough, et al., versus World       14     KYROS LAW OFFICES     14     Wrestling Entertainment Incorporated and       15     17 Miles Road     15     Singleton and LoGrasso.       18     kon@kyroslaw.com     18     Will all counsel please identify       19     ANTH			21	
23     24       24     25       3     5       1     A P P E A R A N C E S:     1     THE VIDEOGRAPHER: We are now on       2     the record.     3     My name is Joseph Wills, the       4     Attorneys for Plaintiff Vito LoGrasso     5     Worldwide. This is a video deposition       5     POGUST BRASLOW MILLROOD, LLC     5     Worldwide. This is a video deposition       6     Eight Tower Bridge     6     for the United States District Court for       7     161 Washington St., Suite 1520     7     the District of Connecticut. Today's       8     Conshohocken, Pennsylvania 19428     8     date is May 18, 2016, and the video time       9     BY: ANDREW J. SCIOLLA, ESQ.     9     is 9:35 a.m.       10     asciolla@pbmattorneys.com     10     This deposition is being held at       11     1650 Market Street, Philadelphia,     12       12     Pennsylvania, in the matters of       13     Attorneys for Plaintiff Vito LoGrasso     13     McCullough, et al., versus World       14     KYROS LAW OFFICES     14     Wrestling Entertainment Incorporated and       15     17 Miles Road     15     Singleton			22	
24     24       25     3       3     5       1     A P P E A R A N C E S:     1       2     the record.       3     3       4     Attorneys for Plaintiff Vito LoGrasso     4       5     POGUST BRASLOW MILLROOD, LLC     5       6     Forthe United States District Court for       7     161 Washington St., Suite 1520       8     Conshohocken, Pennsylvania 19428       9     BY: ANDREW J. SCIOLLA, ESQ.       9     BY: ANDREW J. SCIOLLA, ESQ.       9     BY: ANDREW J. SCIOLLA, ESQ.       10     asciolla@pbmattorneys.com       11     1650 Market Street, Philadelphia,       12     Pennsylvania, in the matters of       13     Attorneys for Plaintiff Vito LoGrasso     13       14     KYROS LAW OFFICES     14       15     Singleton and LoGrasso versus World       16     Hingham, Massachusetts 02043     16       17     Mils Road     15       15     Singleton and LoGrasso.     18       16     Hingham, Massachusetts 02043     16       17     BY: KONSTANTINE W. KYROS, E				
25     25       3     3       1     A P P E A R A N C E S:       2     1       3     2       4     Attorneys for Plaintiff Vito LoGrasso       5     POGUST BRASLOW MILLROOD, LLC       6     Eight Tower Bridge       7     161 Washington St., Suite 1520       8     Conshohocken, Pennsylvania 19428       9     BY: ANDREW J. SCIOLLA, ESQ.       9     BY: ANDREW J. SCIOLLA, ESQ.       10     asciolla@pbmattorneys.com       11     1650 Market Street, Philadelphia,       12     Pennsylvania, in the matters of       13     Attorneys for Plaintiff Vito LoGrasso       14     KYROS LAW OFFICES       14     KYROS LAW OFFICES       15     17 Miles Road       16     Hingham, Massachusetts 02043       16     Wrestling Entertainment Incorporated and       17     BY: KONSTANTINE W. KYROS, ESQ.       18     kom@kyroslaw.com       19     ANTHONY NORRIS, ESQ.       20     MR. SCIOLLA: Andrew Sciolla from       21     Pogust Braslow Millrood, on behalf the       22     plaintiff, Vito LoGrasso. </td <td></td> <td></td> <td></td> <td></td>				
3351A P P E A R A N C E S:1THE VIDEOGRAPHER: We are now on22the record.33My name is Joseph Wills, the4Attorneys for Plaintiff Vito LoGrasso45POGUST BRASLOW MILLROOD, LLC5Worldwide. This is a video deposition6Eight Tower Bridge6for the United States District Court for7161 Washington St., Suite 15207the District of Connecticut. Today's8Conshohocken, Pennsylvania 194288date is May 18, 2016, and the video time9BY: ANDREW J. SCIOLLA, ESQ.9is 9:35 a.m.10asciolla@pbmattorneys.com10This deposition is being held at111650 Market Street, Philadelphia,122Pennsylvania, in the matters of13Attorneys for Plaintiff Vito LoGrasso13McCullough, et al., versus World14KYROS LAW OFFICES14Wrestling Entertainment Incorporated and1517 Miles Road15Singleton and LoGrasso versus World16Hingham, Massachusetts 0204316Wrestling Entertainment Incorporated.17BY: KONSTANTINE W. KYROS, ESQ.19themselves.202020MR. SCIOLLA: Andrew Sciolla from212222222223233242424KYROS: Konstantine Kyros,				
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	23			
			24	Kyros Law Offices. for the plaintiff.

2 (Pages 2 to 5)

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	6	;	8
1	MR. NORRIS: Anthony Norris, Kyros	1	A. She was more of an indie wrestler.
2	Law Offices, for the plaintiff.		
3	MR. McDEVITT: Jerry McDevitt for	3	C
4	WWE.	4	I ,
5	MS. LACY: Stefanie Lacy for WWE.	5	
6	VITO J. LOGRASSO, called	6	
7	as a witness, having been duly sworn, was		8
8	examined and testified as follows:	8	•
9	EXAMINATION BY	9	· ·
10	MR. McDEVITT:	10	
11	Q. Would you state your name for the	11	
12	record, please?	12	
13	A. Veto J. LoGrasso.	13	J 1
14	Q. Have you ever testified under oath	14	8
15	before?	15	I I I I I I I I I I I I I I I I I I I
16	A. No, sir.	16	
17	Q. Do you understand the oath you've	17	
18	just taken?	18	
19	A. Yes, sir.	19	
20	Q. And you understand it obligates you	20	
21	to tell the truth, even if telling the truth	21	•
22	is against your interest?	2.2	
23	A. Yes.	23	
24	Q. And even if the truth is contrary	2.4	
25	to what you said in court pleadings?	25	
	7	,	9
1	A. Yes, sir.	1	
2	<b>Q.</b> What's your date of birth, sir?		-
3	A. $6/18/64$ .		<b>C</b>
4	<b>Q.</b> And what is your current address?	4	
5	A. 12 Flemming Drive, Coatesville,	5	
6	Pennsylvania, 19320.	6	
7	Q. Do you own that property?		
8	A. No, I do not. My wife does.	8	
9	Q. How long have you lived there?		- • •
10	A. Two years, I think.	10	-
11	<b>Q.</b> Does anybody else live there	11	- • •
$12^{11}$	besides you and your wife?	12	•
13	A. No, just us.	13	
14	<b>Q.</b> What is your wife's name?	14	_
15	A. Becca, B-E-C-A C-C-A.	15	- • • •
16	Q. What was her maiden name?	16	•
17	A. Ford.	17	
18	Q. And am I correct, she was also a	18	
19	previous performer in the wrestling business?	19	
20	A. Yes, sir.	20	•
21	Q. But not with WWE, correct?	21	
22	A. No.	22	-
23	Q. She was with WCW?	23	
24	A. No.	24	•
25	Q. Who did she perform for?	25	
	X. The are present for the second sec	۲- ۲	nounder of providers you have nying in

3 (Pages 6 to 9)

		-1	•
	58		60
1	medical attention from your own personal	1	Q. Did somebody point out to you, in
2	doctor for these matters?	2	connection with coming in here today, that
3	A. Because I was also being treated by	3	you did go see the doctor after that event
4	Dr. Rios.	4	with Steven Regal, but you just didn't bother
5	Q. You've sworn under oath in the	5	to report a head injury, you reported a
6	Answers to Interrogatories here that you	6	problem with your stomach?
7	never told Dr. Rios about any head injuries;	7	MR. SCIOLLA: Object to the form.
8	is that true?	8	I'm going to are you asking about
9	A. I told him I had headaches, I was	9	what he discussed with his attorneys?
10	feeling woozy. I told him that I was	10	MR. McDEVITT: I'm asking him if
11	lethargic, tired from being on the road; and	11	somebody pointed that out to him, yes.
12	that's when he submitted and gave me	12	MR. SCIOLLA: Including his
13	B-12 shots.	13	attorneys?
14	Q. Did you ever tell him that you	14	MR. McDEVITT: Yes.
15	thought you sustained a concussion or a head	15	MR. SCIOLLA: So you're asking for
16	injury in a specific match?	16	an attorney-client privileged
17	A. I never told Dr. Rios that I had a	17	communication?
18	concussion.	18	MR. McDEVITT: I'm asking I'm
19	Q. Did you ever tell him, doctor, in a	19	entitled to anything that refreshed his
20	match that just occurred, I think I hurt my	20	recollection for his testimony today.
21	head?	21	MR. SCIOLLA: That wasn't what your
22	A. I told him that when I came back	22	question was.
23	from a match that I needed to collect myself	23	MR. McDEVITT: Let's try it this
24	and that I was feeling a little woozy and I	24	way:
25	had a welt on my stomach, if I'm interpreting	25	Q. Did you look at Dr. Rios' notes in
	59		61
1	one particular time and that I wasn't, you	1	connection with preparing for your testimony
2	know, I wasn't feeling right and I just	2	today?
3	needed to take a shower just to cool off.	3	A. No, sir, I didn't.
4	Q. You told him you needed to take a	4	Q. Was it pointed out to you that you
5	shower, you needed to take a shower to cool	5	didn't report a head injury to Dr. Rios, but
6	off?	6	you reported some other thing to Dr. Rios?
7	A. Yeah.	7	MR. SCIOLLA: I am going to object
8	Q. But I'm being very specific here.	8	to the form. And to the extent he's
9	I want to make sure I understand.	9	talking about attorney-client
10	Did you ever go to Dr. Rios and	10 11	communications, I don't want you to
11	say, doctor, I hit my head on something	11 12	answer.
12 13	during that fight, and I think I'm hurt, and	13	MR. McDEVITT: Well, which
13 14	have him examine you for a specific head	14	attorney? Which attorney-client
	injury that you reported to him?	15	which attorney are we talking about privilege here?
15 16	A. No, sir, I did not.	15 16	
17	Q. Including the one where you say	17	MR. SCIOLLA: Any of the ones that he
18	Steve Regal threw you into the steps?	18	
19	A. That's when I went back to him, after the match; and when I went back, he	19	MR. McDEVITT: Well, it's not any. Which attorney specifically had that
19 20	attended to me, because I had a lump on my	20	communication you're claiming the
20 21	stomach. And he saw that I was a little, a	21	privilege with? I'm entitled to know
22	little out of it and sweating a lot; and I	22	the name of the attorney.
23	said that I needed to take a shower just to	23	MR. SCIOLLA: Any of the attorneys
2.4	cool down, then he attended to my stomach	24	he mentioned that he prepared for his
25 25	afterwards.	25	deposition.
2.5		~ ~	

16 (Pages 58 to 61)