

Exhibit 12

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>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>
<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>

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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 **Q. Anybody else?**
 2 A. My doctors.
 3 **Q. I'm talking about people who used**
 4 **to work for WWE.**
 5 **Your wife didn't work for WWE, I**
 6 **mean you've already testified --**
 7 A. I'm just giving you a general
 8 answer. No.
 9 **Q. When did you first decide that the**
 10 **symptoms you now claim to have had for years**
 11 **are caused by brain injuries?**
 12 MR. SCIOLLA: Object to the form.
 13 MR. McDEVITT: What's the
 14 objection?
 15 MR. SCIOLLA: Your characterization
 16 that he had all the same symptoms for
 17 years and that there wasn't any
 18 progression of his symptoms and their
 19 severity.
 20 MR. McDEVITT: I didn't make any
 21 such characterization at all.
 22 Would you like the question read
 23 back?
 24 MR. SCIOLLA: Sure, read it back.
 25 (A portion of the record was read.)

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1 MR. SCIOLLA: Same objection.
 2 You can answer.
 3 A. So I get it right. Can you repeat
 4 it for me one more time? I'd appreciate it.
 5 **Q. Yes. When did you first determine**
 6 **that the symptoms you now claim to have were**
 7 **associated with brain injuries suffered while**
 8 **you performed for WWE?**
 9 MR. SCIOLLA: Same objection.
 10 A. That would be the year 2014.
 11 **Q. All right. And what was it in 2014**
 12 **that made you come to that conclusion?**
 13 A. When I started going to the
 14 doctors, and they started telling me that I
 15 had all these symptoms that I was suffering
 16 from, you know, these things that I'm dealing
 17 with. So that's when, you know, I started to
 18 put two and two together that I had
 19 concussion syndrome, and as part of that I
 20 might have a brain injury.
 21 **Q. Did any doctor tell you in 2014**
 22 **that you had brain injuries caused by**
 23 **wrestling?**
 24 A. My neurologist, Dr. Handler.
 25 **Q. You say he told that you in 2014?**

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1 A. When I started seeing Dr. Handler.
 2 **Q. I'm not saying when you started**
 3 **seeing him.**
 4 **Is it your testimony that he told**
 5 **you that in 2014?**
 6 A. No, you asked -- if you asked me if
 7 there was anybody who told you -- told me.
 8 And when I seen my neurologist, and you asked
 9 me the people who said this, and it was the
 10 neurologist who told me.
 11 **Q. No. My question is very precise,**
 12 **Mr. LoGrasso.**
 13 **In 2014, did any doctor tell you**
 14 **that the symptoms you had were associated**
 15 **with brain injuries while you were performing**
 16 **for WWE?**
 17 A. I tried to -- I'm trying to gauge
 18 when I saw Dr. Handler. I'm not sure if I
 19 saw him in 2014, or was it '15.
 20 **Q. Did you have --**
 21 A. I'm not sure.
 22 **Q. By 2008, your complaint alleges**
 23 **that you had pounding headaches; is that**
 24 **correct?**
 25 A. In 2008?

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1 **Q. Yes.**
 2 A. Who alleged that I had that?
 3 **Q. You did.**
 4 A. Would you repeat the question
 5 again.
 6 **Q. Is it true that by 2008 you had**
 7 **pounding headaches?**
 8 A. I started dealing with headaches.
 9 **Q. Was that in 2008?**
 10 A. That's been all along, since maybe,
 11 I started with the headaches in 2000 -- 2006.
 12 **Q. 2006.**
 13 A. Yeah.
 14 **Q. Did you get headaches when you were**
 15 **performing for WCW and getting hit over the**
 16 **head with chairs?**
 17 A. I don't recall.
 18 **Q. Did you get headaches when you were**
 19 **performing for ECW and getting hit over the**
 20 **head with chairs?**
 21 A. I don't recall.
 22 **Q. What I just said is true, isn't it?**
 23 **You did get hit over the head with chairs in**
 24 **ECW and WCW, didn't you?**
 25 MR. SCIOLLA: Object to the form.

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1 A. I did get hit with chairs in WCW
2 and in ECW.
3 **Q. And by the way, the matches you**
4 **identified that you got hurt in WWE, there**
5 **were no chairs involved in any of those**
6 **matches, were there?**
7 A. No, sir.
8 **Q. Those were conventional wrestling**
9 **matches, right?**
10 MR. SCIOLLA: Object to the form.
11 A. Conventional in what manner?
12 **Q. Well, there were no other objects.**
13 **It was you and another performer wrestling,**
14 **correct?**
15 A. Except for the steel steps and the
16 mat and the posts and the ring, those are all
17 objects you hit your head against.
18 **Q. But those are all part of a normal**
19 **wrestling match, correct?**
20 A. Stairs are not part of the
21 wrestling match, and the table is not, you
22 know -- when you go against tables or the
23 announce tables or the barriers. Those are
24 all part of it, too.
25 **Q. And you claim you did that in any**

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1 **of the matches you identified as hurting**
2 **yourself in WWE?**
3 A. One more time? I'm sorry.
4 **Q. Are you claiming you got thrown**
5 **through a table in any WWE match?**
6 A. No, I didn't say that.
7 **Q. And are you claiming you got hurt**
8 **by thrown into a barrier at a WWE match?**
9 A. I just didn't say. You asked me if
10 there was a conventional match and what was
11 used, and that's what I'm saying. We used
12 the ring, we used the posts, we used all of
13 that stuff, and it's all part of the
14 conventional thing.
15 **Q. So your headaches started in 2006.**
16 **And then did they continue**
17 **thereafter?**
18 A. They -- it was 2006, after -- after
19 I got hit, when I hit my head against the
20 stairs; and that's when things started to,
21 started to go different, started to change.
22 **Q. And the stairs being the same one**
23 **we're talking about in the Steve Regal match**
24 **that you identified as the one --**
25 A. Steel chairs, steel, yes.

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1 **Q. And that's when you're saying your**
2 **headaches started, because you got your head**
3 **hit in that match?**
4 A. Uh-huh.
5 **Q. You have to say yes or no. That's**
6 **all he writes down is words, not shaking your**
7 **head.**
8 A. I'm listening and --
9 **Q. I understand.**
10 A. -- those are the same stairs that
11 we used, yes.
12 **Q. And you're saying that when you hit**
13 **your head on those stairs in that match with**
14 **Steven Regal is when these headaches really**
15 **began?**
16 A. That's when they started, that's --
17 after I got hit, after I hit my head in that
18 match, that's when my headaches became -- I
19 didn't understand why I was getting them, and
20 that's when things changed for me and my
21 health changed with my head.
22 **Q. So that match with Steve Regal,**
23 **then, where you claim he threw you into the**
24 **stairs was sort of a turning point for you,**
25 **wasn't it, in the sense that these headaches**

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1 **that you now claim, that's when the genesis**
2 **of this is?**
3 MR. SCIOLLA: Object to the form.
4 Mischaracterizes his testimony.
5 You can answer.
6 A. Can you repeat the question?
7 **Q. Well, prior to that episode that**
8 **you've just described where you claim Steven**
9 **Regal threw you into the steps, in the match**
10 **you've identified in this case, is it your**
11 **testimony you didn't have headaches before**
12 **that event?**
13 MR. SCIOLLA: Object to the form.
14 Mischaracterizes his testimony.
15 A. Not that I recall.
16 **Q. So that in all the matches with**
17 **ECW -- and by the way, you were with the ECW**
18 **before WWE, right?**
19 A. No. Actually I was in WWF before I
20 was in ECW.
21 **Q. Didn't you go from ECW to WCW?**
22 A. No, sir, I started my career in
23 WWF.
24 **Q. Well, when you were a job -- I**
25 **understand you were a jobber for couple years**