

Exhibit 13

UNITED STATES DISTRICT COURT

DISTRICT OF CONNECTICUT

-----X

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

| | |
|--|---|
| 2 | 4 |
| <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> |
| 3 | 5 |
| <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> |

6

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?**

7

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?**

8

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

9

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**

234

1 se.
 2 **Q. And what was your understanding of**
 3 **what happened to Chris Nowinski?**
 4 A. I'm not sure.
 5 **Q. Did you ever hear he got**
 6 **concussions?**
 7 A. Not that I was aware of.
 8 **Q. You never heard Chris Nowinski got**
 9 **concussions?**
 10 A. I know he runs this foundation.
 11 **Q. And when did you learn that, when**
 12 **did you learn that?**
 13 A. A concussion foundation.
 14 **Q. When did you learn that?**
 15 A. I'm not sure.
 16 **Q. But your testimony is that you**
 17 **never heard in the locker rooms or anywhere**
 18 **that Chris Nowinski had to retire from the**
 19 **WWE wrestling because of concussions that he**
 20 **received?**
 21 A. I didn't know he had to retire
 22 because of a concussion.
 23 **Q. Did you know that he got**
 24 **concussions?**
 25 A. I don't recall if he got a

235

1 concussion.
 2 **Q. Did you know that he went into the**
 3 **area of concussion research?**
 4 A. I know he was into the research.
 5 **Q. Did you know that in 2005, 2006?**
 6 A. No.
 7 **Q. Did you know he wrote a book?**
 8 A. No.
 9 **Q. So your testimony is you had no**
 10 **knowledge whatsoever of this wrestler who**
 11 **went into concussion research that led to all**
 12 **these scientific discoveries of what we're**
 13 **here to talk about?**
 14 A. I'm sorry, I don't read books.
 15 **Q. Did you know Chris Benoit?**
 16 A. Yes.
 17 **Q. Was he a friend of yours?**
 18 A. I guess you could say he was a
 19 friend. We worked together.
 20 **Q. And you're aware what happened**
 21 **shortly after you left -- by the way, did you**
 22 **know his wife?**
 23 A. Nancy, right?
 24 **Q. Yes.**
 25 A. Uh-huh.

236

1 **Q. Did you know her, too?**
 2 A. Yeah, I knew her. Yeah.
 3 **Q. And did you know Dr. Aston?**
 4 A. Dr. Aston I don't think I met.
 5 **Q. Did you know that's the person who**
 6 **was supplying him drugs down in Georgia?**
 7 A. No. Person life like that, I don't
 8 know.
 9 **Q. So you were aware of Chris Benoit**
 10 **murdering his wife and his son and then**
 11 **committing suicide in 2007, weren't you?**
 12 A. Yes, sir.
 13 **Q. And would you agree with me that**
 14 **was a huge story --**
 15 A. Yes, sir.
 16 **Q. -- just about everywhere when it**
 17 **happened, wasn't it? National news, USA**
 18 **Today, People magazine, well-known in**
 19 **wrestling business, wasn't it?**
 20 A. Yeah, it was well known. I mean --
 21 **Q. And you followed that story, didn't**
 22 **you?**
 23 A. All I know is that she, they said
 24 he had CTE, he had brain damage. They said
 25 it could have been a steroid range -- rage,

237

1 excuse me.
 2 WWE had said that it had nothing to
 3 do with wrestling.
 4 **Q. Where did WWE say that?**
 5 A. I don't recall.
 6 **Q. Then why did you say that, if you**
 7 **don't recall?**
 8 A. Because that's what I remember. If
 9 you're asking me. I remember that you guys
 10 took him off, you guys took him off all of
 11 your programming, and he was abolished, and
 12 he's a memory in the WWE.
 13 **Q. What does that have to do with the**
 14 **WWE supposedly saying that it nothing to do**
 15 **with wrestling?**
 16 A. Because I believe that's what you
 17 guys had said.
 18 **Q. Where?**
 19 A. I don't remember where, but it had
 20 nothing to do with wrestling. You know, he
 21 was just -- he went out of his mind. He
 22 could have had CTE, it could have been a
 23 steroid rage.
 24 **Q. So when did you hear that he could**
 25 **have had CTE?**

238

1 A. Well, at the same time he was
 2 having all of these problems when the story
 3 came out.
 4 **Q. And that was 2007, right?**
 5 A. I think it was after 2007. I'm not
 6 sure.
 7 **Q. Well, do you recall there being a**
 8 **big press conference that announced he had**
 9 **CLE (sic)? It was all over the news.**
 10 MR. SCIOLLA: CLE?
 11 MS. LACY: CTE.
 12 MR. SCIOLLA: It's not legal
 13 classes.
 14 **Q. CTE. Do you remember there being a**
 15 **news conference announcing this and making a**
 16 **whole lot of publicity about the fact that**
 17 **this wrestler who had murdered his wife and**
 18 **his child had this supposed CTE?**
 19 A. I mean I feel story that he did
 20 that, and I knew Nancy and I knew him and I
 21 knew the son, and I feel bad.
 22 **Q. I'm sure we all do, Mr. LoGrasso,**
 23 **but my question is: Did you hear about the**
 24 **press conference where there was this**
 25 **announcement that he had CTE?**

239

1 A. No, I did not.
 2 **Q. But you knew it was said publicly**
 3 **in or around the time of that murder that he**
 4 **had CTE?**
 5 A. Right.
 6 **Q. And that was, frankly, a big story**
 7 **in the wrestling business, wasn't it?**
 8 MR. SCIOLLA: Objection, asked and
 9 answered.
 10 A. It was.
 11 **Q. And there probably wasn't anybody**
 12 **that ever wrestled in that time frame that**
 13 **did not know Chris Benoit had been supposedly**
 14 **diagnosed with CTE?**
 15 MR. SCIOLLA: Objection, calls for
 16 speculation.
 17 **Q. Would you agree with that?**
 18 A. It was a big story, like you said.
 19 **Q. And people were talking about it in**
 20 **locker rooms, because they were concerned**
 21 **about what does that mean about me; is that**
 22 **fair to say?**
 23 MR. SCIOLLA: Object to form.
 24 A. There was a lot of talk at that
 25 time. Like, you know, nobody knew for sure.

240

1 He could have went into a steroid rage,
 2 because he was on the gas. He could have, it
 3 could have been, who knows? You know, I was
 4 there, nobody knows for sure what the hell
 5 happened. All I know is that it happened,
 6 and it was a shock to the wrestling world.
 7 **Q. And a lot of people were wondering**
 8 **about the CTE aspect, weren't they?**
 9 MR. SCIOLLA: Objection, calls for
 10 speculation.
 11 A. I guess so. I'm not sure.
 12 **Q. Well, what was his finishing move?**
 13 A. Flying head butt off the top of, if
 14 I remember. Cripple cross fist.
 15 **Q. But in terms of flying head butt,**
 16 **wasn't that a lot of discussion about whether**
 17 **that particular move is what contributed to**
 18 **his alleged head trauma and CTE?**
 19 MR. SCIOLLA: Objection, calls for
 20 speculation.
 21 **Q. Do you recall --**
 22 A. It could have been something that
 23 he did every night.
 24 **Q. And you recall that being part of**
 25 **the discussion as to whether that was part of**

241

1 **what caused it?**
 2 A. No, I don't recall.
 3 **Q. Do you know how many newspaper**
 4 **articles and media stories were out there**
 5 **about Chris Benoit and CTE?**
 6 A. No, I don't, sir.
 7 **Q. But you would agree a lot, right?**
 8 MR. SCIOLLA: Objection.
 9 A. I would assume so. It was a pretty
 10 big story.
 11 **Q. Well, when you heard that story,**
 12 **did you go to your doctor, your personal**
 13 **doctor and say, do I have anything to worry**
 14 **about?**
 15 A. No, because it wasn't until 2014
 16 that I started to get myself checked out and
 17 realized that something could possibly be
 18 wrong.
 19 So whatever Chris Benoit did or how
 20 or that stuff didn't pertain to me at the
 21 time, because I didn't think it was me. But
 22 it wasn't until I started going to these
 23 doctors, and they started telling me that I
 24 had these symptoms, that I thought that it
 25 could be me. And that's when I started to do