## Exhibit 14

1 UNITED STATES DISTRICT COURT DISTRICT OF CONNECTICUT RUSS MCCULLOUGH, et al., Plaintiff, No. 3:15-cv-01074 (VLB) vs. WORLD WRESTLING ENTERTAINMENT, INC., Defendant. EVAN SINGLETON and VITO LOGRASSO, Plaintiffs, No. 3:15-cv-00425 (VLB) vs. WORLD WRESTLING ENTERTAINMENT, INC., Defendant. VIDEOTAPED DEPOSITION OF VITO LOGRASSO Philadelphia, Pennsylvania May 18, 2016 9:35 a.m. Reported by: Jennifer Ocampo-Guzman, CRR, CLR JOB NO. 44300

1 APPEARANCES (Con 2 3 4 Attorneys for Defendant	4 nt.d):
2 3 3	nt.d):
2 3 3	
4 Attorneys for Defendant	
5 K&L GATES, LLP	
6 210 Sixth Avenue	
7 Pittsburgh, Pennsylva	nia 15222
8 May 18, 2016 8 BY: JERRY McDEY	
9 9:35 a.m. 9 jerry.mcdevitt@kl	gates.com
10 STEFANIE M. LA	ACY, ESQ.
Videotaped Deposition of VITO 11 stefanie.lacy@klg	ates.com
LOGRASSO, held at the offices of 12	
13 Kleinbard, LLC, 1650 Market Street, 13	
Philadelphia, Pennsylvania, pursuant to 14 ALSO PRESENT:	
notice, before Jennifer Ocampo-Guzman, 15 JOSEPH WILLS, Videog	rapher
16 a Certified Real-Time Shorthand 16	
Reporter and Notary Public of the 17	
18 Commonwealth of Pennsylvania. 18	
19	
20	
21	
22	
23	
24	
25 25	
3	5
1 APPEARANCES: 1 THE VIDEOGRAPHER:	We are now on
2 the record.	
3 My name is Joseph Wills.	
4 Attorneys for Plaintiff Vito LoGrasso 4 videographer obtained by Da	
5 POGUST BRASLOW MILLROOD, LLC 5 Worldwide. This is a video	
6 Eight Tower Bridge 6 for the United States District	
7 161 Washington St., Suite 1520 7 the District of Connecticut.	-
8 Conshohocken, Pennsylvania 19428 8 date is May 18, 2016, and the	e video time
9 BY: ANDREW J. SCIOLLA, ESQ. 9 is 9:35 a.m.	1.1
10 asciolla@pbmattorneys.com 10 This deposition is being h	
11 1650 Market Street, Philadel	-
12 Pennsylvania, in the matters 13 Attorneys for Plaintiff Vito LoGrasso 13 McCullough, et al., versus W	
,	
<ul> <li>KYROS LAW OFFICES</li> <li>14 Wrestling Entertainment Inc</li> <li>15 17 Miles Road</li> <li>15 Singleton and LoGrasso vers</li> </ul>	_
16 Hingham, Massachusetts 02043 16 Wrestling Entertainment Inc.	
BY: KONSTANTINE W. KYROS, ESQ. 17 The deponent is Vito LoGras	
18 kon@kyroslaw.com  18 Will all counsel please ide	
19 ANTHONY NORRIS, ESQ. 19 themselves.	Citary
20 ANTHONY NORRIS, ESQ. 20 MR. SCIOLLA: Andrew	Sciolla from
21 Pogust Braslow Millrood, or	
22 plaintiff, Vito LoGrasso.	. conun the
23 plantiff, vito Ecolasso. 23 MR. KYROS: Konstanti	ne Kyros.
24 Kyros Law Offices, for the p	-
25 Vito LoGrasso.	,

MR. NORRIS: Anthony Norris, Kyros Law Offices, for the plaintiff.  MR. McDEVITT: Jerry McDevitt for WWE.  Norrich W. WE.  Norrich W. W. W.  Norrich W.		6	5		8
Law Offices, for the plaintiff.  MR. McDEVITT: Jerry McDevitt for  WWE.  MS. LACY: Stefanie Lacy for WWE.  VITO J. LOGRASSO, called  as a witness, having been duly sworn, was  examined and testified as follows:  EXAMINATION BY  MR. McDEVITT:  Q. Would you state your name for the  record, please?  A. No, sir.  Q. Have you ever testified under oath  before?  A. No, sir.  Q. And you understand the oath you've  just taken?  A. Yes, sir.  Q. And even if the truth is contrary  to what you said in court pleadings?  A. A September 27, 2014.  If I got that wrong, I die.  Q. We're going ask her whether you were right.  MR. SCIOLLA: Jerry, I don't meant interrupt, but as you can see, he's  leaning toward you. As much as you can,  keep your voice up so that he can hear.  MR. McDEVITT: If you can't hear or  understand any question I ask you, just  tell me and I will be glad to raise my  voice, but I don't want to appear like  I'm yelling at you.  I may yell at you anyway, but—  THE WITNESS: It's okay.  Q. But seriously, if you cannot hear  me, tell me.  A. Okay.  Q. And what is your current address?  A. Yes, sir.  Q. What's your date of birth, sir?  A. Of 18/64.  Q. And what is your current address?  A. 12 Flemming Drive, Coatesville,  Pennsylvania, 19320.  Pennsylvania, 19320.  Q. Do you own that property?  A. No, Joo not. My wife does.  Q. Do you own that property?  A. No, Joo not. My wife does.  Q. Do boy ou own that property?  A. No, Joo not. My wife does.  Q. What dis your wife's name?  A. Becca, B-E-C-A — C-C-A.  Q. What is your wife's name?  A. Pennsylvania?  A. September 27, 2014.  I'I got that wrong, I die.  We're going ask her whether you were right.  MR. SCIOLLA: Jerry, I don't meant interrupt, but as you can, keep your voice up so that he can hear.  MR. McDEVITT: If you can't hear wo'ce, but I don't want to appear like  I'm yell at you anyway, but—  THE WITNESS: It's okay.  Q. Is your wife disabled?  A. Yes, sir.  Q. And what is your current address?  A. Pennsylvania, 19320.  Q. And deven if the truth, wo'ce, bu	1	MR. NORRIS: Anthony Norris, Kyros		1	A. She was more of an indie wrestler.
MR. McDEVITT: Jerry McDevitt for WWE. WWE. MS. LACY: Stefanie Lacy for WWE. VITO J. LOGRASSO, called as a winness, having been duly sworn, was examined and testified as follows: BEXAMINATION BY MR. McDEVITT: C. Would you state your name for the record, please? A. Veto J. LoGrasso. C. Have you ever testified under oath before? A. No, sir. C. Do you understand the oath you've just taken? A. Yes, sir. C. Q. And you understand it obligates you to tell the truth, even if telling the truth is against your interest? A. Yes. C. Q. And even if the truth is contrary to what you said in court pleadings?  A. Yes, sir. C. Q. What's your date of birth, sir? A. Yes, sir. C. Q. What's your date of birth, sir? A. No, ido not. My wife does. C. Q. How long have you lived there? A. No, ido not. My wife does. C. Q. How long have you lived there? A. No, just us. C. Q. What was her whether you were right. MR. SCIOLLA: Jerry, I don't meant interrupt, but as you can see, he's leaning toward you. As much as you can, keep your voice up so that he can hear. MR. McDEVITT: If you can't hear or understand any question I ask you, just tell me and I will be glad to raise my voice, but I don't want to appear like I'm yelling at you. I may yell at you anyway, but— THE WITNESS: It's okay. Q. But seriously, if you cannot hear met, tell me. A. Yes, de. A. Yes, sir. Q. Mad what is your carneaddress? A. Yes. Q. And what's the nature of her disability? A. She has three hermiated disks and  Pennsylvania, you'ded in Florida? A. Yes, sir. Q. Whor did you move to Pennsylvania? A. Becca, B-EC-A - C-C-A. Q. What was her whether you were right. MR. SCIOLLA: MR. McDEVITT: If you can't hear or understand any question I ask you, just tell me and I will be glad to raise my voice, but I don't want to appear like I'm yelling at you. I may yell at you anyway, but— THE WITNESS: It's okay. Q. Is your wife disabled? A. Yes, Q. And what's the nature of her disability? A. She has three hermiated disks and  Pennsylvania, you lived in Florida? A. Yes, sir. Q. Why did you		· · · · · · · · · · · · · · · · · · ·			
WWE.   MS. LACY: Stefanic Lacy for WWE.   Summer of the vitto J. LOGRASSO, called as a witness, having been duly sworn, was examined and testified as follows:   Were right.   MR. SCIOLLA: Jerry, I don't meant interrupt, but as you can see, he's leaning toward you. As much as you can, keep your voice up so that he can hear.   MR. McDEVITT:   You can't hear or understand any question I ask you, just the record, please?   Law You have you ever testified under oath before?   Law You have you understand the oath you've   Law You've, but I don't want to appear like   Image and I will be glad to raise my voice, but I don't want to appear like   Image and I will be glad to raise my voice, but I don't want to appear like   Image and I will be glad to raise my voice, but I don't want to appear like   Image and I will be glad to raise my voice, but I don't want to appear like   Image and I will be glad to raise my voice, but I don't want to appear like   Image and I will be glad to raise my voice, but I don't want to appear like   Image and I will be glad to raise my voice, but I don't want to appear like   Image and I will be glad to raise my voice, but I don't want to appear like   Image and I will be glad to raise my voice, but I don't want to appear like   Image and I will be glad to raise my voice, but I don't want to appear like   Image and I will be glad to raise my voice, but I don't want to appear like   Image and I will be glad to raise my voice, but I don't want to appear like   Image and I will be glad to raise my voice, but I don't want to appear like   Image and I will be glad to raise my voice, but I don't want to appear like   Image and I will be glad to raise my voice, but I don't want to appear like   Image and I will be glad to raise my voice, but I don't want to appear like   Image and I will be glad to raise my voice, but I don't want to appear like   Image and I will be glad to raise my voice, but I don't want to appear like   Image and I will be glad to raise my voice, but I don't want to appear l					
S. LACY: Stefanic Lacy for WWE.   VITO J. LOGRASSO, called   as a witness, having been duly sworn, was   examined and testified as follows:   S. EXAMINATION BY   S. EXAMINATION BY OUT OF THE WITHOUT STATEM BY S. EXAMINATION BY OUT OF THE WITHOUT STATEM BY S. EXAMINATION BY OUT OF THE WITHOUT STATEM BY S. EXAMINATION BY OUT OF THE WITHOUT STATEM BY S. EXAMINATION BY OUT OF THE WITHOUT STATEM BY S. EXAMINATION BY OUT OF THE WITHOUT STATEM BY S. EXAMINATION BY OUT OF THE WITHOUT STATEM BY S. EXAMINATION BY OUT OF THE WITHOUT STATEM BY S. EXAMINATION BY OUT OF THE WITHOUT STATEM BY S. EXAMINATION BY OUT OF THE WITHOUT STATEM BY S. EXAMINATION BY OUT OF THE WITHOUT STATEM BY S. EXAMINATION BY OUT OF THE WITHOUT STATEM BY S. EXAMINATION BY OUT OF THE WITHOUT STATEM BY S. EXAMINATION BY OUT OF THE WITHOUT STATEM BY S. EXAMINATION BY OUT OF THE WITHOUT STATEM BY S. EXAMINATION BY OUT OF THE WITHOUT STATEM BY S. EXAMINATION BY OUT OF THE WITHOUT STATEM BY S. EXAMINATION BY OUT OF THE WITHOUT STATEM		· · · · · · · · · · · · · · · · · · ·			•
6 VITO J. LOGRASSO, called 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 O. 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. 10 Q. And you understand it obligates you to to tell the truth, even if telling the truth 10 is against your interest? 11 A. Yes, sir. 12 Q. What's your date of birth, sir? 13 A. Yes, sir. 14 Q. And what is your current address? 15 A. 12 Flemming Drive, Coatesville, 16 Pennsylvania, 19320. 17 Q. Do you own that property? 18 A. No, Ido not. My wife does. 19 Q. How long have you lived there? 10 A. Two years, I think. 11 Q. Does anybody else live there besides you anylous wife's name? 14 A. Beccas, B.EC.A. — CC.A. 15 Q. What is your wife's name? 16 Q. What was her maiden name? 17 A. Ford. 18 examined and testified as follows: 19 and was you can see, he's leaning toward you. As much as you can, keep your voice up so that he can hear. 11 MR. McDEVITT: If you can't hear or understand any question I ask you, just the and I will be glad to raise my voice, but I don't want to appear like I'm yelling at you. 11 Imay yell at you anyway, but 12 THE WITNESS: It's okay. 12 Q. But seriously, if you cannot hear me, tell me. 14 A. Yes, sir. 15 Q. And what is truth is contrary to what you said in court pleadings? 16 A. Yes, sir. 27 Q. What's your date of birth, sir? 28 A. 12 Flemming Drive, Coatesville, 19 Pennsylvania, 19320. 29 A. No, just us. 20 Q. What is your wife's name? 21 A. Beccas B.EC.A.—C.C.A. 21 A. Beccas B.EC.A.—C.C.A. 22 C. What was her maiden name? 23 A. No, just us. 24 Q. And am I correct, she was also a previous performer in the wrestling business? 25 A. Pes, sir. 26 Q. What was her maiden name? 27 A. A. Gay, I know it was in 2014, I think. 28 Q. What is your wife's name? 29 A. Secas B.EC.A.—C.C.A. 20 Q. What was her maiden name? 21 A. No, just us. 22 Q. But not with WWE, correct? 23 A.					=
as a witness, having been duly sworn, was examined and testified as follows: EXAMINATION BY MR. McDEVITT: Q. Would you state your name for the record, please? A. Veto J. LoGrasso. A. Veto J. LoGrasso. A. No, sir. Q. Do you understand the oath you've just taken? A. Yes, sir. Q. And you understand it obligates you to tell the truth, even if telling the truth is against your interest? A. Yes. Q. And even if the truth is contrary to what you said in court pleadings? A. Yes, sir. Q. What's your date of birth, sir? A. A. Yes, sir. Q. Do you wonthat is your current address? A. 12 Flemming Drive, Coatesville, Pennsylvania, 19320. A. No, just us. Q. Mow hat is your current address? A. No, just us. Q. Do you own that property? A. No, log not. My wife does. Q. How long have you lived there? A. No, just us. Q. What is your wife? A. No, just us. Q. What is your wife? A. No, just us. Q. What is your wife? A. No, just us. Q. What was her maiden name? A. Ford. Q. Mo and an I correct, she was also a previous performer in the wrestling business? A. No. Q. But not with WWE, correct? A. No. Q. But not with WWE, correct? A. No. Q. Have you told some of your		<del>-</del>			
8 examined and testified as follows: 9 EXAMINATION BY 10 MR. McDEVITT: 11 Q. Would you state your name for the record, please? 12 A. Veto J. LoGrasso. 13 tell me and I will be glad to raise my voice, but I don't want to appear like Pm yelling at you. 14 J. Porton. 15 J. Porton. 16 A. No, sir. 17 Q. Do you understand the oath you've particular to the forc? 18 Jist taken? 19 A. Yes, sir. 19 Q. And you understand it obligates you to tell the truth, even if telling the truth is against your interest? 21 A. Yes. 22 A. Yes. 23 A. Yes. 24 Q. And even if the truth is contrary to what you said in court pleadings? 25 A. 12 Flemming Drive, Coatesville, 26 Pennsylvania, 19320. 27 Q. Do you own that property? 28 A. No, I do not. My wife does. 29 Q. How long have you lived there? 20 A. No, just us. 21 A. No, just us. 22 D. Sour wife disabled? 23 A. No, just us. 24 Q. What is your wife? 25 A. Two years, I think. 26 Q. What was her maiden name? 27 A. Ford. 28 Q. What was her maiden name? 29 A. No, Just us. 20 Q. What was her maiden name? 21 A. Ford. 22 D. But not with WWE, correct? 23 A. Yes, sir. 24 Q. And am I correct, she was also a previous performer in the wrestling business? 26 A. Yes, sir. 27 Q. But not with WWE, correct? 28 A. No. 29 Q. She was with WCW? 20 D. Sour wife with well in the world					e
SEXAMINATION BY   10   10   10   10   10   10   10   1		•		8	•
MR. McDEVITT:   Q. Would you state your name for the record, please?   12				9	-
1			1	L 0	·
record, please? A. Veto J. LoGrasso.  Q. Have you ever testified under oath before? A. No, sir. Q. Do you understand the oath you've just taken? A. Yes, sir. Q. And you understand it obligates you to tell the truth, even if telling the truth is against your interest? Q. And even if the truth is contrary to what you said in court pleadings? A. Yes, sir. Q. What's your date of birth, sir? A. A. Cis, sir. Q. What's your date of birth, sir? A. A. Cis, sir. Q. What's your date of birth, sir? A. A. Cis, sir. Q. What's your date of birth, sir? A. A. Cis, sir. Q. What's your date of birth, sir? A. A. Cis, sir. Q. What's your date of birth, sir? A. A. Cis, sir. Q. What's your date of birth, sir? A. A. Cis, sir. Q. What's your ournert address? A. Let's see. I'm not sure of the day. I know it was in 2014, I think. Q. What is your wife's name? A. Becca, B-E-C-A. C-C-A. Q. What is your wife's name? A. Pord. Q. And was with wown. A. Pord. Q. And am I correct, she was also a previous performer in the wrestling business? Q. But not with WWE, correct? A. No. Q. Wha was with WCW? A. No. A. No. A. Okay. Q. Is your wife disabled? A. Yes. Q. And what's the nature of her disability? A. Say hat one more time? Q. What disy our ournert address? A. Let's see. I'm not sure of the day. I know it was in 2014, I think. Q. Why did you move back to Pennsylvania? A. Because I closed my wrestling school, and I decided to get married. Q. Why didy ou move back to Pennsylvania? A. Say that one more time? Q. Si true you hate living in Pennsylvania? A. Fin not fond of Pennsylvania. The people are nice, but I'm not too fond of Pennsylvania. A. No. Q. Have you told some of your	11		1	L1	
A. Veto J. LoGrasso.  Q. Have you ever testified under oath before?  A. No, sir.  Q. Do you understand the oath you've 17 18 just taken?  Q. And you understand it obligates you to tell the truth, even if telling the truth 21 is against your interest? 22 A. Yes. 23 A. Yes. 24 Q. And even if the truth is contrary 25 to what you said in court pleadings?  25 to what you said in court pleadings?  1 A. Yes, sir. 2 Q. What's your date of birth, 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. 6 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 previous performer in the wrestling business? 19 Q. But not with WWE, correct? 20 A. Yes, sir. 21 Q. But not with WWE, correct? 22 A. No. 23 Q. She was with WCW? 24 A. No. 25 to What is your wife's name? 26 A. Yes, sir. 27 Q. What is your wife's name? 28 A. Yes, sir. 29 Q. And am I correct, she was also a 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 to what you said in court pleadings? 26 A. Yes, sir. 27 Q. What is your date of birth, sir? 28 A. Yes, sir. 29 Q. When did you move to Pennsylvania? 29 A. Yes, sir. 20 Q. Why did you move back to Pennsylvania? 20 A. No. 21 Q. What is your wife's name? 22 A. Yes, sir. 23 Q. But not with WWE, correct? 24 A. No. 25 You hat living in Pennsylvania? 26 A. I'm not fond of Pennsylvania. 27 A. I'm not fond of Pennsylvania. 28 Q. You hat living in Pennsylvania. 29 Q. You hat living in Pennsylvania. 20 Q. Have you told some of your			1	L2	
Q. Have you ever testified under oath before? A. No, sir. Q. Do you understand the oath you've just taken? A. Yes, sir. Q. And you understand it obligates you to tell the truth, even if telling the truth is against your interest? Q. And even if the truth is contrary to what you said in court pleadings?  A. Yes, sir. Q. What's your date of birth, sir? A. A. 6/18/64. Q. And what is your current address? A. 12 Flemming Drive, Coatesville, Pennsylvania, 19320. Q. Do you own that property? A. No, Ido not. My wife does. Q. How long have you lived there? Q. How long have you lived there? Q. How long have you lived there? Q. What is your wife? A. No, just us. Q. What is your wife? A. No, is taken? A. Pord. Q. What was her maiden name? A. Pord. Q. What was her maiden name? A. Yes, sir. Q. Why couldn't you stay in Florida? A. My wife lives here, and she has two children here. Q. Why couldn't you stay in Florida? A. Yes, sir. Q. Why couldn't you stay in Florida? A. My wife lives here, and she has two children here. Q. Why couldn't you stay in Florida? A. Yes, sir. Q. Why couldn't you stay in Florida? A. My wife lives here, and she has two children here. Q. Why couldn't you stay in Florida? A. Yes, sir. Q. Why couldn't you stay in Florida? A. Say that one more time? Q. You hate living in Pennsylvania? A. I'm not fond of Pennsylvania. Q. What was her maiden name? A. Yes, sir. Q. You hate living in Pennsylvania? A. I'm not fond of Pennsylvania. Q. Whave you told some of your	13	· •	1	L3	
15   before?	14		1	L 4	
A. No, sir.  Q. Do you understand the oath you've la tyou anyway, but	15	•	1	L 5	1.1
7    3    3    4    4    5    5    6    6    6    6			1	L6	
18    just taken?	17	Q. Do you understand the oath you've	1	L7	
A. Yes, sir.  Q. And you understand it obligates you to tell the truth, even if telling the truth   1	18		1	L8	·
to tell the truth, even if telling the truth is against your interest?  A. Yes.  Q. And even if the truth is contrary 24 disability?  To what you said in court pleadings?  A. Yes, sir.  Q. What's your date of birth, sir? A. 6/18/64.  Q. And what is your current address? A. 12 Flemming Drive, Coatesville, Pennsylvania, 19320.  Q. How long have you lived there?  Q. How long have you lived there?  Desides you and your wife? A. No, just us.  Q. What is your wife's name? A. Rord. Q. What was her maiden name? A. Ford. Q. But not with WWE, correct? A. No. Q. She was with WCW? A. Yes.  Q. And what's the nature of her disability? A. Yes. Q. And what's the nature of her disability? A. Yes. A. She has three herniated disks and  Pennsylvania, you lived in Florida? A. Yes, sir. Q. When did you move to Pennsylvania? A. Let's see. I'm not sure of the day. I kinow it was in 2014, I think. Q. The year is fine. The year 2014? A. Ithink so, yeah. Q. Why did you move back to Pennsylvania? A. Because I closed my wrestling school, and I decided to get married. Q. Why couldn't you stay in Florida? A. My wife lives here, and she has two children here. Q. Is it true you hate living in Pennsylvania? A. Say that one more time? Q. You hate living in Pennsylvania? A. I'm not fond of Pennsylvania. The people are nice, but I'm not too fond of Pennsylvania. A. No. Q. Have you told some of your	19	A. Yes, sir.	1	L9	=
to tell the truth, even if telling the truth is against your interest?  A. Yes.  Q. And even if the truth is contrary 24 disability?  To what you said in court pleadings?  A. Yes, sir.  Q. What's your date of birth, sir? A. 6/18/64.  Q. And what is your current address? A. 12 Flemming Drive, Coatesville, Pennsylvania, 19320.  Q. How long have you lived there?  Q. How long have you lived there?  Desides you and your wife? A. No, just us.  Q. What is your wife's name? A. Rord. Q. What was her maiden name? A. Ford. Q. But not with WWE, correct? A. No. Q. She was with WCW? A. Yes.  Q. And what's the nature of her disability? A. Yes. Q. And what's the nature of her disability? A. Yes. A. She has three herniated disks and  Pennsylvania, you lived in Florida? A. Yes, sir. Q. When did you move to Pennsylvania? A. Let's see. I'm not sure of the day. I kinow it was in 2014, I think. Q. The year is fine. The year 2014? A. Ithink so, yeah. Q. Why did you move back to Pennsylvania? A. Because I closed my wrestling school, and I decided to get married. Q. Why couldn't you stay in Florida? A. My wife lives here, and she has two children here. Q. Is it true you hate living in Pennsylvania? A. Say that one more time? Q. You hate living in Pennsylvania? A. I'm not fond of Pennsylvania. The people are nice, but I'm not too fond of Pennsylvania. A. No. Q. Have you told some of your	20		þ	20	
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? 26 A. Yes. 27 A. She has three herniated disks and 28 A. Yes, sir. 29 Q. What's your date of birth, sir? 30 A. 6/18/64. 40 Q. And what is your current address? 40 A. 12 Flemming Drive, Coatesville, 41 Q. Do you own that property? 41 A. No, I do not. My wife does. 41 Q. Does anybody else live there 42 Q. What is your wife's name? 43 A. No, ist us. 44 Q. What is your wife's name? 45 A. Becca, BECACCA. 46 Q. What was her maiden name? 47 Q. What was her maiden name? 48 A. No, ist us. 49 Q. What was her maiden name? 40 Q. What was her maiden name? 41 A. Ford. 41 Q. But not with WWE, correct? 42 A. No. 43 Spinal stenosis. 44 Q. And prior to moving to 45 Pennsylvania, you lived in Florida? 46 A. Yes, sir. 47 Q. When did you move to Pennsylvania? 48 A. Ithink so, yeah. 49 Q. Why did you move back to 40 Pennsylvania? 40 Pennsylvania? 41 A. Becca, BECACCA. 41 A. Becca, BECACCA. 42 Q. What was her maiden name? 43 A. Ford. 44 Q. What was her maiden name? 44 Q. What was her maiden name? 45 A. Becca, BECACCA. 46 Q. What was her maiden name? 47 A. Ford. 48 A. Yes, sir. 49 Q. Why couldn't you stay in Florida? 40 A. My wife lives here, and she has two children here. 41 A. Say that one more time? 42 A. Say that one more time? 43 A. Say that one more time? 44 A. Im not fond of Pennsylvania. The people are nice, but I'm not too fond of Pennsylvania. 45 A. No. 46 Q. She was with WCW? 47 A. I'm not tool fond of Pennsylvania. 48 A. I'm not fond of Pennsylvania. 49 Pennsylvania. 40 A. I'm not fond of Pennsylvania. 40 A. I'm not too fond of Pennsylvania. 41 A. No. 42 Q. She was with WCW? 41 A. I'm not tool fond of Pennsylvania. 42 A. No. 43 Pennsylvania. 44 A. No. 45 A. Secause I closed my wrestling school, and I decided to get married. 49 A. My wife lives here, and she has	21		þ	21	· · · · · · · · · · · · · · · · · · ·
A. Yes. Q. And even if the truth is contrary 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? 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 previous performer in the wrestling business? 19 Q. She was with WCW? 20 A. And prior to moving to 21 A. Yes, sir. 22 Q. And prior to moving to 23 Q. And prior to moving to 24 A. Yes, sir. 25 Q. Mhen did you move to Pennsylvania? 26 A. Let's see. I'm not sure of the day. I know it was in 2014, I think. 29 Q. Why did you move back to 20 Pennsylvania? 21 A. Because I closed my wrestling school, and I decided to get married. 20 Q. Why couldn't you stay in Florida? 21 A. Say that one more time? 22 A. No. 23 Q. She was with WCW? 24 A. She has three herniated disks and 25 A. She has three herniated disks and 26 A. She has three herniated disks and 27 A. She has three herniated disks and 28 A. Sepinal stenosis. 29 Q. And prior to moving to 20 A. Yes, sir. 20 Q. When did you move to Pennsylvania? 21 A. Let's see. I'm not sure of the day. I know it was in 2014, I think. 20 The year is fine. The year 2014? 21 A. Because I closed my wrestling school, and I decided to get married. 20 Why couldn't you stay in Florida? 21 A. My wife lives here, and she has two children here. 22 A. Yes, sir. 23 Q. You hate living in Pennsylvania? 24 A. I'm not fond of Pennsylvania? 25 A. I'm not fond of Pennsylvania. 26 Pennsylvania. 27 A. My wife lives here, and she has two children here. 28 Q. You hate living in Pennsylvania. 29 A. I'm not fond of Pennsylvania. 30 A. I'm not fond of Pennsylvania. 41 A. No. 42 P	22		þ	22	= •
Q. And even if the truth is contrary 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. 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. 10 Q. Does anybody else live there 11 besides you and your wife? 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 previous performer in the wrestling business? 19 A. Yes, sir. 20 When did you move to Pennsylvania? 4 A. Ithink so, yeah. 4 Q. Why did you move back to 4 Pennsylvania? 4 A. Because I closed my wrestling school, and I decided to get married. 4 Q. What was her maiden name? 5 A. Ford. 6 Q. And am I correct, she was also a previous performer in the wrestling business? 10 A. Yes, sir. 11 you hat eliving in Pennsylvania? 12 Q. But not with WWE, correct? 13 A. She has three herniated disks and 14 Q. Men did you move to Pennsylvania? 15 A. Let's see. I'm not sure of the day. I know it was in 2014, I think. 16 Q. Why did you move back to 17 Pennsylvania? 18 A. Because I closed my wrestling school, and I decided to get married. 19 Q. Why couldn't you stay in Florida? 10 A. My wife lives here, and she has two chiddren here. 11 Q. Is it true you hate living in Pennsylvania? 12 A. Say that one more time? 13 A. Say that one more time? 14 A. No. 18 C. The pear is fine. The year 2014? 19 A. Because I closed my wrestling school, and I decided to get married. 19 Q. Why couldn't you stay in Florida? 20 A. My wife lives here, and she has two chiddren here. 21 A. Say that one more time? 22 A. Yes, sir. 23 Q. She was with WCW? 24 Pennsylvania. 25 A. Who did you move to Pennsylvania. 26 A. My in the pear 2014? 27 A. Ithink so, yeah. 29 Q. Why did you move to Pennsylvania? 29 A. Because I closed	23		þ	23	Q. And what's the nature of her
to what you said in court pleadings?  7  A. Yes, sir.  Q. What's your date of birth, sir? A. 6/18/64.  Q. And what is your current address? A. 12 Flemming Drive, Coatesville, Pennsylvania, 19320.  Q. When did you move to Pennsylvania? A. Let's see. I'm not sure of the day. I know it was in 2014, I think.  Q. The year is fine. The year 2014? A. I think so, yeah.  Q. Does anybody else live there besides you and your wife? A. No, just us.  Q. What is your current address? A. No, just us.  Q. Why did you move to Pennsylvania? A. Because I closed my wrestling school, and I decided to get married. Q. What was her maiden name? A. Ford. Q. What was her maiden name? A. Ford. Q. And prior to moving to Pennsylvania, you lived in Florida? A. Let's see. I'm not sure of the day. I know it was in 2014, I think. Q. The year is fine. The year 2014? A. I think so, yeah. Q. Why did you move back to Pennsylvania? A. Because I closed my wrestling school, and I decided to get married. Q. Why couldn't you stay in Florida? A. My wife lives here, and she has two children here. Q. Why couldn't you stay in Florida? A. My wife lives here, and she has two children here. Q. Is it true you hate living in Pennsylvania? A. Say that one more time? Q. You hate living in Pennsylvania? A. I'm not fond of Pennsylvania. The people are nice, but I'm not too fond of Pennsylvania. Q. Have you told some of your	24	Q. And even if the truth is contrary	þ	24	disability?
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 previous performer in the wrestling business? 19 Q. But not with WWE, correct? 20 A. No. 21 Q. She was with WCW? 22 A. No. 23 Q. She was with WCW? 24 A. Hon prior to moving to Pennsylvania, you lived in Florida? A. Yes, sir. Q. When did you move to Pennsylvania? A. Let's see. I'm not sure of the day. I know it was in 2014, I think. Q. When did you move to Pennsylvania? A. Let's see. I'm not sure of the day. I know it was in 2014, I think. Q. When did you move to Pennsylvania? A. Let's see. I'm not sure of the day. I know it was in 2014, I think. Q. Why did you move back to Pennsylvania? A. Because I closed my wrestling school, and I decided to get married. Q. Why couldn't you stay in Florida? A. My wife lives here, and she has two children here. Q. Is it true you hate living in Pennsylvania? A. I'm not fond of Pennsylvania. The people are nice, but I'm not too fond of Pennsylvania. Q. Have you told some of your	25		þ	25	A. She has three herniated disks and
Q. What's your date of birth, sir? A. 6/18/64. Q. And what is your current address? A. 12 Flemming Drive, Coatesville, Pennsylvania, 19320. Q. Do you own that property? A. No, I do not. My wife does. Q. How long have you lived there? A. Two years, I think. Q. Does anybody else live there Besides you and your wife? A. No, just us. Q. What is your wife's name? A. Becca, B-E-C-A C-C-A. C. What was her maiden name? A. Ford. Q. And m I correct, she was also a previous performer in the wrestling business? A. No. Q. She was with WCW? A. No. Q. She was with WCW? A. And and I date of birth, sir? A. And prior to moving to Pennsylvania? A. Yes, sir. Q. When did you move to Pennsylvania? A. Let's see. I'm not sure of the day. I know it was in 2014, I think. Q. The year is fine. The year 2014? A. I think so, yeah. Q. Why did you move back to Pennsylvania? A. Because I closed my wrestling school, and I decided to get married. Q. Why couldn't you stay in Florida? A. My wife lives here, and she has two children here. Q. Is it true you hate living in Pennsylvania? A. Say that one more time? Q. You hate living in Pennsylvania? A. I'm not fond of Pennsylvania? A. I'm not fond of Pennsylvania? A. Because I closed my wrestling school, and I decided to get married. Q. Why couldn't you stay in Florida? A. My wife lives here, and she has two children here. Q. Is it true you hate living in Pennsylvania? A. Say that one more time? A. Yes, sir. Q. You hate living in Pennsylvania? A. I'm not fond of Pennsylvania. The people are nice, but I'm not too fond of Pennsylvania. Q. Have you told some of your		7	7		9
Q. What's your date of birth, sir? A. 6/18/64. Q. And what is your current address? A. 12 Flemming Drive, Coatesville, Pennsylvania, 19320. Q. Do you own that property? A. No, I do not. My wife does. Q. How long have you lived there? A. Two years, I think. Q. Does anybody else live there Besides you and your wife? A. No, just us. Q. What is your wife's name? A. Becca, B-E-C-A C-C-A. C. What was her maiden name? A. Ford. Q. And m I correct, she was also a previous performer in the wrestling business? A. No. Q. She was with WCW? A. No. Q. She was with WCW? A. And and I date of birth, sir? A. And prior to moving to Pennsylvania? A. Yes, sir. Q. When did you move to Pennsylvania? A. Let's see. I'm not sure of the day. I know it was in 2014, I think. Q. The year is fine. The year 2014? A. I think so, yeah. Q. Why did you move back to Pennsylvania? A. Because I closed my wrestling school, and I decided to get married. Q. Why couldn't you stay in Florida? A. My wife lives here, and she has two children here. Q. Is it true you hate living in Pennsylvania? A. Say that one more time? Q. You hate living in Pennsylvania? A. I'm not fond of Pennsylvania? A. I'm not fond of Pennsylvania? A. Because I closed my wrestling school, and I decided to get married. Q. Why couldn't you stay in Florida? A. My wife lives here, and she has two children here. Q. Is it true you hate living in Pennsylvania? A. Say that one more time? A. Yes, sir. Q. You hate living in Pennsylvania? A. I'm not fond of Pennsylvania. The people are nice, but I'm not too fond of Pennsylvania. Q. Have you told some of your	1	A. Yes. sir.		1	spinal stenosis.
A. 6/18/64.  Q. And what is your current address? A. 12 Flemming Drive, Coatesville, Pennsylvania, 19320.  Q. Do you own that property? A. No, I do not. My wife does. Q. How long have you lived there? A. Two years, I think. Q. Does anybody else live there besides you and your wife? A. No, just us. Q. What is your wife's name? A. Becca, B-E-C-A C-C-A. C. What was her maiden name? A. Ford. Q. And am I correct, she was also a previous performer in the wrestling business? A. No. Q. But not with WWE, correct? A. No. Q. She was with WCW? A. No. A. Yes, sir. Q. When did you move to Pennsylvania? A. Let's see. I'm not sure of the day. I know it was in 2014, I think. Q. When did you move to Pennsylvania? A. Let's see. I'm not sure of the day. I know it was in 2014, I think. Q. Why did you move back to Q. Why did you move back to Pennsylvania? A. Because I closed my wrestling school, and I decided to get married. Q. Why couldn't you stay in Florida? A. My wife lives here, and she has two children here. Q. Is it true you hate living in Pennsylvania? A. Say that one more time? A. Fun not fond of Pennsylvania. The people are nice, but I'm not too fond of Pennsylvania. A. No. Q. Have you told some of your					=
4 Q. And what is your current address? 5 A. 12 Flemming Drive, Coatesville, 6 Pennsylvania, 19320. 6 Q. Do you own that property? 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 previous performer in the wrestling business? 19 Q. But not with WWE, correct? 20 Q. She was with WCW? 21 Q. She was with WCW? 22 A. No. 24 A. Yes, sir. 25 Q. When did you move to Pennsylvania? 26 A. Let's see. I'm not sure of the day. I know it was in 2014, I think. 26 Q. Whey garl is fine. The year 2014? 27 A. I think so, yeah. 28 Q. Why did you move back to Pennsylvania? 29 A. I think so, yeah. 20 Q. Why did you move back to Pennsylvania? 20 A. I think so, yeah. 20 Q. Why did you move back to Pennsylvania? 21 Q. Why did you move to Pennsylvania? 22 A. I think so, yeah. 29 Q. Why did you move back to Pennsylvania? 20 A. I think so, yeah. 20 Q. Why did you move back to Pennsylvania? 21 Q. Why did you move back to Pennsylvania? 22 A. Because I closed my wrestling school, and I decided to get married. 29 Q. Why couldn't you stay in Florida? 20 A. My wife lives here, and she has two children here. 20 Q. Is it true you hate living in Pennsylvania? 21 Q. You hate living in Pennsylvania? 22 A. I'm not fond of Pennsylvania. 23 A. I'm not fond of Pennsylvania. 24 A. No. 25 Q. Have you told some of your					
A. 12 Flemming Drive, Coatesville, Pennsylvania, 19320.  Q. Do you own that property? A. No, I do not. My wife does. Q. How long have you lived there? A. Two years, I think. Q. Does anybody else live there besides you and your wife? A. No, just us.  Q. What is your wife's name? A. Becca, B-E-C-A C-C-A. C. What was her maiden name? A. Ford. Q. What am I correct, she was also a previous performer in the wrestling business? A. Yes, sir. Q. When did you move to Pennsylvania? A. Let's see. I'm not sure of the day. I know it was in 2014, I think. A. Let's see. I'm not sure of the day. I know it was in 2014, I think. A. Let's see. I'm not sure of the day. I know it was in 2014, I think. A. Let's see. I'm not sure of the day. I know it was in 2014, I think. A. I think so, yeah. Q. Why did you move back to Pennsylvania? A. Because I closed my wrestling school, and I decided to get married. A. My wife lives here, and she has two children here. Q. Is it true you hate living in Pennsylvania? A. Say that one more time? Q. You hate living in Pennsylvania? A. I'm not fond of Pennsylvania. The people are nice, but I'm not too fond of Pennsylvania. A. No. Q. Have you told some of your					• • • •
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 previous performer in the wrestling business? 19 Pennsylvania? 10 A. Let's see. I'm not sure of the day. I know it was in 2014, I think. 10 Q. The year is fine. The year 2014? 10 A. I think so, yeah. 11 Q. Why did you move back to Pennsylvania? 12 A. Because I closed my wrestling school, and I decided to get married. 13 Q. Why couldn't you stay in Florida? 14 A. My wife lives here, and she has two children here. 17 A. Ford. 18 Q. Is it true you hate living in Pennsylvania? 19 Pennsylvania? 10 A. Say that one more time? 11 Q. You hate living in Pennsylvania? 12 A. No. 13 Say that one more time? 14 A. I'm not fond of Pennsylvania. The people are nice, but I'm not too fond of Pennsylvania. 18 Q. She was with WCW? 19 A. Let's see. I'm not sure of the day. I know it was in 2014, I think.  Q. The year is fine. The year 2014? A. I think so, yeah.  Q. Why did you move back to Pennsylvania? A. Because I closed my wrestling school, and I decided to get married.  Q. Why couldn't you stay in Florida? A. My wife lives here, and she has two children here.  Q. Is it true you hate living in Pennsylvania? A. Say that one more time? A. I'm not fond of Pennsylvania. The people are nice, but I'm not too fond of Pennsylvania.  Q. Have you told some of your					·
7Q. Do you own that property?7day. I know it was in 2014, I think.8A. No, I do not. My wife does.8Q. The year is fine. The year 2014?9Q. How long have you lived there?9A. I think so, yeah.10A. Two years, I think.10Q. Why did you move back to11Q. Does anybody else live there11Pennsylvania?12besides you and your wife?12A. Because I closed my wrestling13A. No, just us.13school, and I decided to get married.14Q. What is your wife's name?14Q. Why couldn't you stay in Florida?15A. Becca, B-E-C-A C-C-A.15A. My wife lives here, and she has two16Q. What was her maiden name?16children here.17A. Ford.17Q. Is it true you hate living in18Q. And am I correct, she was also a18Pennsylvania?19A. Yes, sir.20A. Say that one more time?20A. Yes, sir.21A. I'm not fond of Pennsylvania. The21A. No.22people are nice, but I'm not too fond of22A. No.23Pennsylvania.24A. No.24Q. Have you told some of your					= -
A. No, I do not. My wife does.  Q. How long have you lived there?  A. Two years, I think.  Q. Does anybody else live there  besides you and your wife?  A. No, just us.  Q. Why did you move back to  Pennsylvania?  A. Because I closed my wrestling  school, and I decided to get married.  Q. What is your wife's name?  A. Becca, B-E-C-A C-C-A.  A. Becca, B-E-C-A C-C-A.  C. What was her maiden name?  A. Ford.  Q. And am I correct, she was also a  previous performer in the wrestling business?  A. Yes, sir.  Q. Wound the with WWE, correct?  A. No.  A. Wwife lives here, and she has two children here.  A. Say that one more time?  A. Say that one more time?  A. I'm not fond of Pennsylvania?  A. I'm not fond of Pennsylvania. The people are nice, but I'm not too fond of Pennsylvania.  A. No.  A. No.  A. Have you told some of your	7	·		7	
9 Q. How long have you lived there? 10 A. Two years, I think. 11 Q. Does anybody else live there 11 Pennsylvania? 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 previous performer in the wrestling business? 19 A. Yes, sir. 20 A. Yes, sir. 21 Q. But not with WWE, correct? 22 A. No. 23 Q. She was with WCW? 24 A. No. 29 A. I think so, yeah. Q. Why did you move back to Pennsylvania? A. Beccas, yeah. Q. Why did you move back to Pennsylvania? A. Because I closed my wrestling school, and I decided to get married. Q. Why couldn't you stay in Florida? A. My wife lives here, and she has two children here. Q. Is it true you hate living in Pennsylvania? A. Say that one more time? Q. You hate living in Pennsylvania? A. I'm not fond of Pennsylvania. The people are nice, but I'm not too fond of Pennsylvania. A. No. Q. Have you told some of your	8			8	•
A. Two years, I think.  Q. Does anybody else live there besides you and your wife?  A. No, just us.  Q. What is your wife's name?  A. Becca, B-E-C-A C-C-A.  Q. What was her maiden name?  A. Ford.  Q. And am I correct, she was also a previous performer in the wrestling business?  A. Yes, sir.  Q. But not with WWE, correct?  A. No.  Q. Why did you move back to Pennsylvania?  A. Because I closed my wrestling school, and I decided to get married.  Q. Why couldn't you stay in Florida?  A. My wife lives here, and she has two children here.  Q. Is it true you hate living in Pennsylvania?  A. Say that one more time?  A. Say that one more time?  A. I'm not fond of Pennsylvania. The people are nice, but I'm not too fond of Pennsylvania.  Q. She was with WCW?  A. No.  Q. Have you told some of your	9	•		9	= *
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? 19 A. Yes, sir. 20 A. Yes, sir. 21 Q. But not with WWE, correct? 22 A. No. 23 Q. She was with WCW? 24 A. No. 26 Pennsylvania? 27 Pennsylvania? 28 A. Beccause I closed my wrestling school, and I decided to get married. 29 A. My wife lives here, and she has two children here. 20 C. Is it true you hate living in Pennsylvania? 21 Pennsylvania? 22 A. Say that one more time? 23 Q. You hate living in Pennsylvania? 24 A. No. 25 Pennsylvania. 26 Q. Have you told some of your	10	·	1	L 0	· · · · · · · · · · · · · · · · · · ·
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? 16 Q. What was her maiden name? 17 A. Ford. 18 Q. And am I correct, she was also a previous performer in the wrestling business? 19 A. Yes, sir. 20 A. Yes, sir. 21 Q. But not with WWE, correct? 22 A. No. 23 Q. She was with WCW? 24 A. No. 25 A. Beccause I closed my wrestling school, and I decided to get married.  Q. Why couldn't you stay in Florida? A. My wife lives here, and she has two children here. Q. Is it true you hate living in Pennsylvania? A. Say that one more time? A. Say that one more time? A. I'm not fond of Pennsylvania. The people are nice, but I'm not too fond of Pennsylvania. A. No. 40 Pennsylvania. 41 Q. Have you told some of your	11	· · · · · · · · · · · · · · · · · · ·	þ	L1	
A. No, just us.  Q. What is your wife's name?  A. Becca, B-E-C-A C-C-A.  Q. What was her maiden name?  A. Ford.  Q. And am I correct, she was also a previous performer in the wrestling business?  A. Yes, sir.  Q. But not with WWE, correct?  A. No.  13 school, and I decided to get married.  Q. Why couldn't you stay in Florida?  A. My wife lives here, and she has two children here.  Q. Is it true you hate living in Pennsylvania?  A. Say that one more time?  Q. You hate living in Pennsylvania?  A. I'm not fond of Pennsylvania. The people are nice, but I'm not too fond of Pennsylvania.  Q. She was with WCW?  Q. Have you told some of your	12		þ	L2	
Q. What is your wife's name? A. Becca, B-E-C-A C-C-A. C. What was her maiden name? A. Ford. C. And am I correct, she was also a previous performer in the wrestling business? A. Yes, sir. C. But not with WWE, correct? A. No. C. What is your wife's name? A. My wife lives here, and she has two children here. C. Q. Is it true you hate living in Pennsylvania? A. Say that one more time? C. You hate living in Pennsylvania? A. I'm not fond of Pennsylvania. The people are nice, but I'm not too fond of Pennsylvania. A. No. C. She was with WCW? A. No. C. Have you told some of your		•			
A. Becca, B-E-C-A C-C-A.  Q. What was her maiden name? A. Ford.  Q. And am I correct, she was also a previous performer in the wrestling business? A. Yes, sir.  Q. But not with WWE, correct? A. No.  Q. She was with WCW?  A. No.  A. My wife lives here, and she has two children here.  Q. Is it true you hate living in Pennsylvania?  A. Say that one more time?  Q. You hate living in Pennsylvania?  A. I'm not fond of Pennsylvania. The people are nice, but I'm not too fond of Pennsylvania.  Q. Have you told some of your					<u>~</u>
16 Q. What was her maiden name? 18 A. Ford. 19 Pennsylvania? 19 A. Yes, sir. 20 A. Yes, sir. 21 Q. But not with WWE, correct? 22 A. No. 23 Q. She was with WCW? 24 A. No. 26 Children here. 27 Q. Is it true you hate living in Pennsylvania? 28 Pennsylvania? 29 A. Say that one more time? 20 Q. You hate living in Pennsylvania? 21 A. I'm not fond of Pennsylvania. The people are nice, but I'm not too fond of Pennsylvania. 24 Q. Have you told some of your			þ	L 5	= 7
A. Ford.  Q. And am I correct, she was also a previous performer in the wrestling business?  A. Yes, sir.  Q. Is it true you hate living in Pennsylvania?  A. Say that one more time?  Q. You hate living in Pennsylvania?  A. I'm not fond of Pennsylvania. The people are nice, but I'm not too fond of Pennsylvania.  Q. She was with WCW?  A. No.  Q. Have you told some of your					-
18 Q. And am I correct, she was also a previous performer in the wrestling business? 19 A. Yes, sir. 20 But not with WWE, correct? 21 A. No. 22 Pennsylvania? 23 Q. She was with WCW? 24 A. No. 25 Pennsylvania. 26 Pennsylvania? 27 A. Say that one more time? 28 Q. You hate living in Pennsylvania? 29 A. I'm not fond of Pennsylvania. The people are nice, but I'm not too fond of Pennsylvania. 20 Q. Have you told some of your		-			
previous performer in the wrestling business?  A. Yes, sir.  Q. But not with WWE, correct?  A. No.  Q. She was with WCW?  A. No.  Q. Have you told some of your	18	Q. And am I correct, she was also a	þ	L8	
A. Yes, sir.  Q. But not with WWE, correct?  A. No.  She was with WCW?  A. No.  Q. She was with WCW?  A. No.  Q. She was with WCW?  A. No.  Q. Have you told some of your			þ	L 9	•
Q. But not with WWE, correct?  A. No.  Pennsylvania. The people are nice, but I'm not too fond of Pennsylvania.  Pennsylvania.  A. No.  Pennsylvania.  Q. Have you told some of your	20			20	=
22 A. No. 23 Q. She was with WCW? 24 A. No. 25 people are nice, but I'm not too fond of Pennsylvania. 26 Pennsylvania. 27 Pennsylvania. 28 Q. Have you told some of your	21			21	
<ul> <li>Q. She was with WCW?</li> <li>A. No.</li> <li>Pennsylvania.</li> <li>Q. Have you told some of your</li> </ul>	22	-		22	
24 A. No. 24 Q. Have you told some of your	23			23	= =
	24	=		24	
	25	Q. Who did she perform for?		25	

	22		24
1	matches.	1	said.
2	Do you recall that?	2	Q. Did you review any of your medical
3	A. Yes.	3	records?
4	Q. Is it the same matches that you	4	A. No.
5	watched?	5	Q. Are you currently taking any drugs
6	A. Yes, sir.	6	which would impair your memory
7	Q. What were you watching them for?	7	A. No.
8	MR. SCIOLLA: Object to the form.	8	Q or your ability to recall
9	You can answer, to the extent you	9	things?
10	know.	10	A. No.
11	A. Those matches were the matches	11	Q. How much time did you spend
12	where I sustained head injuries.	12	watching the videotapes of the matches in
13	Q. Did you watch the match where	13	preparation for your deposition?
14	Steven Regal appears to throw you into the	14	A. I never watched them. I never
15	metal steps going up to the cage, or up to	15	watched them in preparation. I just, you
16	the ring?	16	know, produced the videotapes. That was it.
17	A. I'm sorry?	17	I didn't do it in preparation for this.
18	Q. Did you watch the match where	18	Q. I'm sorry, I thought you said in
19	Steven Regal appeared to throw you into the	19	your preparation for today you watched those
20	metal steps leading up to the ring?	20	matches. That's what we were just talking
21	A. Yes.	21	about a couple of questions ago.
22	Q. And that's when you claim you hit	22	A. Yes, I watched the matches.
23	your head on the steps and got a concussion?	23	Q. And you watched those with your
24	A. That's when I hit my head. I	24	attorneys, right?
25	didn't know if I had a concussion.	25	A. I did not watch them with the
	23		25
1	Q. But that's one of the matches you	1	attorneys, no.
2	claim now that you hit your head on those	2	Q. So you watched them outside of your
3	steps and you got a concussion, right?	3	preparation session with the attorneys?
4	A. That's when I hit my head. I did	4	A. I watched the matches. I submitted
5	not know I had a concussion.	5	them to the attorneys. I did not watch them
6	Q. I understand that. But now you	6	with the attorneys.
7	claim you did get a concussion, right? You	7	Q. Where did you get those matches?
8	didn't know it then, but now you're claiming	8	A. From tapes I had.
9	you had a concussion, right?	9	Q. Were they tapes? Do you keep tapes
10	MR. McDEVITT: He's talking about	10	of all your matches?
11	your current knowledge, not what you	11	A. There are some that I there are
12	know then.	12	a lot of them that I kept. I just didn't
13	Q. As I understand what you're saying,	13	recall I had them recorded. And usually
14	Mr. LoGrasso, you watched the match with	14	there's a lot of stuff on the WWE network.
15	Steven Regal, you say you hit your head on	15	Q. Did you pull any of those matches
16	those metal steps. You didn't know then that	16	off the network?
17	you got a concussion, but you believe now	17	A. No.
18	that you did.	18	Q. In terms of social media, do you
19	Is that an accurate statement?	19	have a Facebook account?
20	A. That's that's my explanation.	20	A. Yes.
21	Q. What other documents did you	21	Q. Under what name?
22	review? Any other ones?	22	A. Vito LoGrasso.
23	What other documents did you review	23	Q. Do you have a Snapshot account?
24	in preparation for your deposition?	24	A. I don't think so, no.
25	A. It would just be the ones that I	25	Q. Snapchat?

204 202 1 A. I know for a fact he does. 1 was selling, correct? 2 2 MR. SCIOLLA: Object to the form. Q. But again, every wrestler who walks 3 in that ring understands there is a risk of 3 O. As far as you could tell? 4 serious injury associated with what we do; is 4 A. From what I could tell. 5 that a fair statement? 5 Q. Let's go now to the October 10th 6 6 A. Fair statement. match that we've been describing and talking 7 7 Q. Okay. And would you agree, in this about today with Mr. Regal, in which you 8 document, if you would look back to page 9 --8 claim that you had a traumatic brain injury 9 sorry, page 16. 9 and began to suffer headaches thereafter. 10 10 A. You said page 15? MS. LACY: Can you please play 11 Q. I'm sorry, page 16. In bold print 11 LoGrasso, September 10, 2006 full match. 12 there, under 9.12(b), would you just take a 12 THE WITNESS: Is there something 13 13 minute and read that? I'm looking for, or do I have to explain 14 A. Okay. Okay. I've read it. 14 something to you after this match? 15 Q. And does that embrace the concept 15 MR. SCIOLLA: I'm going ask you 16 that we were just talking about, that you 16 some questions afterwards, but just 17 understand there is risk involved, and you're 17 watch it, to refresh your memory. This 18 indicating that you're accepting those risks 18 is the one you identified we've been 19 that come with being a professional wrestler? 19 talking about all day. 20 20 MR. SCIOLLA: Object to form. I think just before we start, I 21 A. Yes, sir. 21 don't think there is multiple occasions 22 22 Q. And that you assumed full where the chair or the steps come into 23 responsibility for all inherent risks as well 23 play. I think it's one scene. 24 as those due to the negligence of a promoter 24 A. One time. 25 or other wrestlers? 25 (Video played.) 205 203 1 A. Yes, sir. 1 Q. Is that the match we've been 2 2 Q. And then down below that in (c), talking about all day, in which you now claim 3 3 you got a serious traumatic brain injury from did you agree that you waived and discharged 4 the WWE from all liability to you on account 4 hitting the steps? 5 of injury to you which results in serious or 5 A. That's the match we talked about. 6 6 permanent injury? O. And at the end of that match were 7 MR. SCIOLLA: Object to form. 7 you dancing? 8 A. I see that, sir, yes. 8 A. Yes, making my way back to the 9 9 Q. And that's what you agreed to, dressing room. 10 right? 10 Q. And what part of your head hit the 11 11 A. Yes, sir. steps? 12 12 Q. In fact, did you hear during I A. The top part. 13 think the pendency of this lawsuit about the 13 O. Point with your finger to what part 14 Mexican wrestler who died in the ring? 14 of your head hit the steps. 15 A. I heard about it. 15 A. It was in here. 16 Q. Did you actually ever see the match 16 Q. And you are pointing to the crown 17 in which he died? 17 of your head? 18 18 A. No, I didn't see it. A. Crown of my head. 19 Q. You didn't see it was sort of just 19 Q. You're saying you went head first 20 a routine maneuver, he hit the ropes and... 20 into those steps? 21 21 A. I didn't see -- I might have saw A. When I got kicked, I was going to 22 22 the end -- I think I saw the clip where he fall, then when I turned, I didn't have 23 23 was laying like this. That's about the enough room. I didn't have enough room for 24 24 extent I saw. me to go anywhere except that when I took --25 25 Q. And the other wrestlers thought he when I saw the steps, I just, you know, they

208 206 1 were there. You know, there is nothing, 1 head. 2 2 nothing for me to do. It was just one of Q. When you are seen after that 3 3 those things that happened. holding your head, are you holding your head 4 4 Q. When you say there was nothing for because you actually hit your head or are you 5 you to do, what do you mean by that? 5 holding your head --6 6 A. Well, there was no place for me to A. I hit my head. 7 7 Q. -- because you're selling the move? land, really, because the angle, like I A. I hit my head. 8 explained before, that I got hit, you know, 8 9 when I went into the steps I was going to 9 Q. You hit your head. LΟ take the bump, that means a fall, I mean I 10 Is there a stunt component or what 11 11 you might call tricks of the trade aspect of looked and I looked where I was and where I 12 was headed and, you know, I did the best I 12 that move that you were supposed to have 13 13 could not to make a full impact with those done? 14 stairs, but I got a good stop. Top of my 14 A. If it was part of the match. There 15 15 is a way that you go into the stairs. head was hit. 16 16 Q. And how is that? Q. Are you saying you didn't know that 17 17 move was going to be part of that match? A. On that particular match, no. 18 18 Q. And if you want to execute that You have to say yes or no. 19 19 move in a way that makes it appear to the 20 20 crowd that you hit your head, make a big Q. So you didn't know that? 21 21 noise by hitting your head, but you don't 22 22 really hit your head, how do you do that Q. So you're saying he actually kicked 23 23 move? What do you do? you? 24 24 A. Try to put your hand in front of A. The kick was part of it. 25 25 Q. And that was a real kick, not a your head and, you know, put your hand, try 207 209 1 fake kick; is that what your testimony is? 1 to make your hand go to the point of contact 2 2 and then you peel off. Peel off means to A. It's a kick. 3 3 Q. What's a flatfoot called? Do you skim. 4 know what a flatfoot is in wrestling 4 Q. So the hand, properly done --5 5 A. Properly done. parlance? 6 6 Q. -- the hand hits the metal steps A. Flatfoot, a flatfoot is when you 7 hit somebody with the flat of your boot, if 7 first, makes a loud noise, makes people think 8 I'm not mistaken. 8 your head is the one that hit the steps; and 9 9 O. And your testimony is that's not then you roll away and hold your head to make .0 what he did there, he actually kicked you? 10 look like that's what happened, right? 11 11 A. The impact of what I was hit with, A. Sometimes when you do that 2 12 it did hit me. He didn't kick me with the particular move, as you know, when you are . 3 13 tip, he didn't kick me with the heel; but doing it or when it's being applied to you, 14 14 sometimes you can't defend the force that's when he did flatfoot, like you are .5 behind the person doing it to you or the suggesting, the impact behind it; you know, 15 L 6 like we said, nobody goes to hurt anybody, 16 force that you're going actually into it. So 17 17 and you do try and protect each other. And there are times when you can hurt yourself 18 18 even doing a safe move like you're saying. when you're outside and your adrenaline is 19 going and you see the ferocity of the match 19 Q. Mr. LoGrasso, before I play the 20 20 and you see the speed you're going at and the next tape, I'm going to give you an 21 21 opportunity to recant the testimony which was hits I'm taking, it does get physical at 22 22 just given and admit it's false. 23 23 Would you care to do that? Q. So you claim you hit the top of 24 24 your head flush on the steps, right? A. Say again? 25 25 Q. I'm going to give you an A. If I remember. I know I hit my

210 212 1 opportunity, before I play the next piece of 1 Q. Your hand comes out, your hand hits 2 2 evidence, that the testimony you've given the steps. Your head never hits the steps, 3 3 today about that step and hitting that step does it. Mr. LoGrasso? 4 4 with your head is categorically false. If A. It's not how I remember it 5 you wish to take the opportunity before I 5 happening. 6 6 show you the next tape, this is your chance Q. Do you agree with me that what you 7 7 saw just now is your hand hits the steps, and to do it. You might want to talk to your 8 8 your head never does? counsel beforehand. 9 9 You understand perjury is a A. Yes, sir. 10 significant Federal crime; you understand 10 Q. So you lied this morning? 11 11 MR. SCIOLLA: Object to the form. that, right? All right. 12 Do you want to talk to your counsel 12 Q. You lied repeatedly this morning, 13 13 before I show the next piece of tape about didn't you? 14 whether you wish to recant what you've 14 A. No, I did not. That's how I 15 15 testified to before I confront you with a remember what happened. 16 piece of evidence? I'm giving you an 16 Q. Your lawyers have told the judge in 17 17 opportunity. I don't have to, but I'm giving a pending motion that is now before the court 18 you the opportunity. 18 in one match positioned -- in one match the 19 19 MR. SCIOLLA: Do you want to talk? position of LoGrasso against Regal in 20 20 MR. KYROS: Yeah, let's talk. September 2006, which we already covered, is 21 Might as well. 21 the one we just watched, "The video of the 22 22 THE VIDEOGRAPHER: The time is match, which has been in defendant's 23 2:32 p.m. Off the record. 23 possession since it aired, shows LoGrasso, 24 24 one, falling head first in the steel steps (A brief recess was taken.) 25 THE VIDEOGRAPHER: Back on. The 25 that were ringside; two, looking dazed and 213 211 1 time is 2:41 p.m. Back on the record. 1 disoriented afterwards; three, repeatedly 2 2 holding his head with his hand; and four, Q. Mr. LoGrasso, you understand you are still under oath? 3 3 continuing to wrestler regardless. 4 A. Yes, sir. 4 "Accordingly, it rings quite hollow 5 5 Q. You've had a chance now to consult when WWE claims that there was no treatment, 6 6 with your counsel? no suspicion, no knowledge of LoGrasso's head 7 7 A. Yes, sir. injury at that time. In fact, the argument 8 Q. And before we go any further, do 8 only further highlights attempts by WWE to 9 9 you wish to recant the testimony you gave deny reality and continue the same course of 10 this morning about hitting your head on the 10 conduct to this day." 11 11 That description of events is steps as false? 12 12 false, isn't it? A. No, sir. 13 13 O. What? MR. SCIOLLA: I'm sorry, what are 14 14 you reading from, counsel? A. No, sir. 15 Q. All right. Let's play the tape. 15 MR. McDEVITT: From your opposition 16 16 MS. LACY: Can you please play to our petition for reconsideration 17 17 which is currently pending before the the --18 18 MR. SCIOLLA: Is this a different court --19 this is a slow motion depiction of what 19 MR. SCIOLLA: Okay. 20 20 MR. McDEVITT: -- that you filed on that step episode is. 21 21 -- I'll answer your question -- that you (LoGrasso Exhibit 20, CD labeled, 22 22 filed on, through Mr. Flaharty, on "LoGrasso October 10, 2006 Stairs Clip," 23 23 5/9/16. There is a currently pending marked for identification, this date.) 24 24 motion before the Federal judge. Q. Would you like to see it again? 25 25 MR. SCIOLLA: It's a brief, written A. Uh-huh.