

# Exhibit 15

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>APPEARANCES (Cont.d):</p> <p>Attorneys for Defendant K&amp;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>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>APPEARANCES:</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.</p> <p>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.</p> <p>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.</p> <p>Will all counsel please identify themselves.</p> <p>MR. SCIOLLA: Andrew Sciolla from Pogust Braslow Millrood, on behalf the plaintiff, Vito LoGrasso.</p> <p>MR. KYROS: Konstantine Kyros, Kyros Law Offices, for the plaintiff, Vito LoGrasso.</p>

6	<p>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 VITO J. LOGRASSO, called 7 as a witness, having been duly sworn, was 8 examined and testified as follows: 9 EXAMINATION BY 10 MR. McDEVITT: 11 <b>Q. Would you state your name for the</b> 12 <b>record, please?</b> 13 A. Veto J. LoGrasso. 14 <b>Q. Have you ever testified under oath</b> 15 <b>before?</b> 16 A. No, sir. 17 <b>Q. Do you understand the oath you've</b> 18 <b>just taken?</b> 19 A. Yes, sir. 20 <b>Q. And you understand it obligates you</b> 21 <b>to tell the truth, even if telling the truth</b> 22 <b>is against your interest?</b> 23 A. Yes. 24 <b>Q. And even if the truth is contrary</b> 25 <b>to what you said in court pleadings?</b></p>	8
7	<p>1 A. Yes, sir. 2 <b>Q. What's your date of birth, sir?</b> 3 A. 6/18/64. 4 <b>Q. And what is your current address?</b> 5 A. 12 Flemming Drive, Coatesville, 6 Pennsylvania, 19320. 7 <b>Q. Do you own that property?</b> 8 A. No, I do not. My wife does. 9 <b>Q. How long have you lived there?</b> 10 A. Two years, I think. 11 <b>Q. Does anybody else live there</b> 12 <b>besides you and your wife?</b> 13 A. No, just us. 14 <b>Q. What is your wife's name?</b> 15 A. Becca, B-E-C-A -- C-C-A. 16 <b>Q. What was her maiden name?</b> 17 A. Ford. 18 <b>Q. And am I correct, she was also a</b> 19 <b>previous performer in the wrestling business?</b> 20 A. Yes, sir. 21 <b>Q. But not with WWE, correct?</b> 22 A. No. 23 <b>Q. She was with WCW?</b> 24 A. No. 25 <b>Q. Who did she perform for?</b></p>	9
6	<p>1 A. She was more of an indie wrestler. 2 <b>Q. When were you married?</b> 3 A. September 27, 2014. 4 If I got that wrong, I die. 5 <b>Q. We're going ask her whether you</b> 6 <b>were right.</b> 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 <b>Q. But seriously, if you cannot hear</b> 19 <b>me, tell me.</b> 20 A. Okay. 21 <b>Q. Is your wife disabled?</b> 22 A. Yes. 23 <b>Q. And what's the nature of her</b> 24 <b>disability?</b> 25 A. She has three herniated disks and</p>	8
7	<p>1 spinal stenosis. 2 <b>Q. And prior to moving to</b> 3 <b>Pennsylvania, you lived in Florida?</b> 4 A. Yes, sir. 5 <b>Q. When did you move to Pennsylvania?</b> 6 A. Let's see. I'm not sure of the 7 day. I know it was in 2014, I think. 8 <b>Q. The year is fine. The year 2014?</b> 9 A. I think so, yeah. 10 <b>Q. Why did you move back to</b> 11 <b>Pennsylvania?</b> 12 A. Because I closed my wrestling 13 school, and I decided to get married. 14 <b>Q. Why couldn't you stay in Florida?</b> 15 A. My wife lives here, and she has two 16 children here. 17 <b>Q. Is it true you hate living in</b> 18 <b>Pennsylvania?</b> 19 A. Say that one more time? 20 <b>Q. You hate living in Pennsylvania?</b> 21 A. I'm not fond of Pennsylvania. The 22 people are nice, but I'm not too fond of 23 Pennsylvania. 24 <b>Q. Have you told some of your</b> 25 <b>healthcare providers you hate living in</b></p>	9

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1 time in WWE, and in this article, I said the  
 2 truth, which is the truth.  
 3 **Q. You had no negatives at all, that**  
 4 **was the truth?**  
 5 A. At that time, yes.  
 6 **Q. And that time, 2013 --**  
 7 A. In 2013.  
 8 **Q. What you now say is you were**  
 9 **suffering from various symptoms of head**  
 10 **trauma that you today dated as beginning when**  
 11 **Steven Regal supposedly threw you into the**  
 12 **steps in the match in 2006?**  
 13 MR. SCIOLLA: Object to the form --  
 14 excuse me. Object to the form.  
 15 **Q. Correct?**  
 16 A. Like I said in a lot of my  
 17 interviews, I always said positive things.  
 18 **Q. Well, was it a lie, then?**  
 19 MR. SCIOLLA: Object to the form,  
 20 asked and answered.  
 21 A. In my interviews I always say  
 22 positive things.  
 23 **Q. That's not my question.**  
 24 **Were you lying in this interview?**  
 25 A. I wasn't lying in the interview.

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1 That's what I said.  
 2 (LoGrasso Exhibit 6, Article  
 3 entitled, "Big Vito speaks out on Dixie  
 4 Carter/TNA, Russo & More," marked for  
 5 identification, this date.)  
 6 **Q. Mr. LoGrasso, I've handed you**  
 7 **what's been marked as Exhibit 6, which**  
 8 **appears to be, at least on the date of it, up**  
 9 **at the top right-hand corner it's dated**  
 10 **4/21/2016; but I don't want to mislead you,**  
 11 **because I don't think that's date of the**  
 12 **interview. I could be wrong.**  
 13 MR. SCIOLLA: If you look at the  
 14 last page, there's a different date.  
 15 MR. McDEVITT: Yes, 2013.  
 16 **Q. I just want to ask you, on the**  
 17 **second page here, there are some quotes that**  
 18 **are attributed to you, where you are asked**  
 19 **about "On the current WWE product."**  
 20 **Do you see that paragraph that**  
 21 **begins with that?**  
 22 A. On the current WWE product. Yes, I  
 23 have it.  
 24 **Q. And then if you skip down where it**  
 25 **says "On Ryback."**

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1 **Do you see that?**  
 2 **Have you found that paragraph, sir?**  
 3 A. I'm reading.  
 4 MR. SCIOLLA: One more down.  
 5 A. "On Ryback."  
 6 **Q. It quotes you as saying, "They**  
 7 **brought Ryback in, you know. Ryback was up**  
 8 **and then he was down. If I could work a**  
 9 **program with him, you would never hear Big**  
 10 **Vito complain about how he ever got hit too**  
 11 **hard. I would love to work with that guy,**  
 12 **because it would be a hard hitting thing."**  
 13 **Did you say that?**  
 14 A. Yes, I did say that.  
 15 **Q. And what did you mean by "it would**  
 16 **be a hard hitting thing"?**  
 17 A. Because my persona is always a  
 18 rugged wrestler, and here you have this guy  
 19 who everybody is complaining with wrestling  
 20 against and, you know, being that I thought  
 21 it would be a good match between him and I.  
 22 **Q. And so were you sort of promoting**  
 23 **the idea that the WWE should bring you back**  
 24 **to wrestle Ryback?**  
 25 A. No, I just said that it would be a

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1 good match.  
 2 **Q. Were you hoping that would happen?**  
 3 A. No, I just said it would be a good  
 4 match.  
 5 **Q. And in 2013 is when you claim you**  
 6 **were suffering from the symptoms of head**  
 7 **injury, right?**  
 8 A. I didn't hear the last part of what  
 9 you said, I'm sorry.  
 10 **Q. You claim you were suffering from**  
 11 **the symptoms of the head injury in 2013, too,**  
 12 **right?**  
 13 A. Yes, sir.  
 14 **Q. How many times prior to this**  
 15 **lawsuit, sir, did you publicly state that you**  
 16 **have been three-quarters deaf your whole**  
 17 **life?**  
 18 A. I did that in an article that I  
 19 wrote for people, for people who were doing  
 20 a, it was a deaf, a guy who was wrestling, a  
 21 Coach McKay who was teaching wrestlers who  
 22 were deaf how to, they were trying to get  
 23 into the Olympics. Wanted me to be a guest  
 24 speaker and to come down to his college, and  
 25 he really had no money. So I took it upon

118	<p>1 myself to write something inspiring for them 2 and write this article that was published. 3 <b>Q. Where was it published?</b> 4 A. I'm not sure where it was 5 published. I think it was on my Facebook. 6 It could have been, it could have been 7 something that was put out there. But I know 8 I wrote it, and I wrote it just for inspiring 9 kids that you can do things even if you're 10 handicapped. 11 <b>Q. And what year did you write that?</b> 12 A. I'm not sure. 13 <b>Q. Before you came to the WWE?</b> 14 <b>Let me rephrase it. Was it before</b> 15 <b>or after your last run at the WWE?</b> 16 A. It was afterwards. 17 <b>Q. And what did you say in that piece?</b> 18 A. I don't recall. I would have to 19 read it. I have it in front of me. 20 <b>Q. Well, what did it say about your</b> 21 <b>deafness?</b> 22 A. Just as you repeated it, that I was 23 deaf, three-quarters deaf or deaf, you know, 24 half my whole life, and then I was able to 25 overcome it.</p>	120	<p>1 A. If I wrote it, and do I write 2 things to inspire people, with lies. 3 <b>Q. No. Did you lie to inspire people.</b> 4 <b>Then you went off on this rant about other</b> 5 <b>subjects.</b> 6 A. I was answering the question. 7 <b>Q. My question was, did you lie in</b> 8 <b>that article in an attempt to inspire them?</b> 9 A. I guess you could say I lied, yes. 10 <b>Q. And did you ever make any other</b> 11 <b>public statements anywhere else that you were</b> 12 <b>three-quarters deaf since birth?</b> 13 A. I don't recall. 14 <b>Q. Did you ever tell your doctors you</b> 15 <b>were deaf since birth?</b> 16 A. I don't recall. 17 <b>Q. Have you been deaf since birth?</b> 18 A. No, sir, I haven't. 19 <b>Q. So any time you've said that, you</b> 20 <b>were lying?</b> 21 A. Yes, sir. 22 <b>Q. Why would you lie about that?</b> 23 MR. SCIOLLA: Object to the form. 24 And asked and answered. 25 A. Why would I lie about it? Well, in</p>
119	<p>1 <b>Q. And that's what you wrote?</b> 2 A. That's what I wrote. 3 <b>Q. Was it true?</b> 4 A. No. 5 <b>Q. So you wrote a lie to inspire</b> 6 <b>people?</b> 7 A. You write things to help people and 8 inspire them, just like the WWE writes things 9 to inspire people, like the anti-bullying 10 campaign, even though they might do it in 11 their own backyard, you know, they do it to 12 inspire, you know, bullying and do all that 13 kind of stuff. 14 It's kind of like when the turkey 15 thing came out, and they insulted me and they 16 had this big anti-bullying thing going on, 17 and they took liberties of making fun of me, 18 calling me a turkey, and my career 19 was nothing to be made fun of. 20 <b>Q. Do you remember the question I</b> 21 <b>asked you?</b> 22 <b>Do you remember the question I just</b> 23 <b>asked you?</b> 24 A. Uh-huh. 25 <b>Q. What was it?</b></p>	121	<p>1 that instance, it was to inspire people. 2 <b>Q. Well, in other instances where</b> 3 <b>you've said it.</b> 4 <b>Have you said it in other</b> 5 <b>instances, or are you claiming that's the</b> 6 <b>only time in your life that you ever told</b> 7 <b>people you were deaf since birth?</b> 8 MR. SCIOLLA: Object to the form, 9 asked and answered. 10 A. I don't recall if I did. 11 <b>Q. Well, has it been a habitual lie</b> 12 <b>that you've told all your life, that you've</b> 13 <b>been deaf since birth?</b> 14 A. No, you asked me that one article, 15 and I said I lied about that. You asked me 16 if I told people I was deaf my whole life, 17 and obviously I'm not, I wasn't. 18 <b>Q. No, I didn't ask you about the one</b> 19 <b>article. You identified the one article. I</b> 20 <b>asked you if you ever made those statements</b> 21 <b>publicly, and you identified that one article</b> 22 <b>with what you did.</b> 23 A. Because that's the one that I knew 24 about. 25 <b>Q. And my question is, what other</b></p>

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1 ones, what other times have you made that  
 2 statement publicly that you've been deaf  
 3 since birth?  
 4 A. I don't know.  
 5 **Q. As you sit there today, can you**  
 6 **think of any other times where you have lied**  
 7 **and told people in the public that you've**  
 8 **been deaf since birth?**  
 9 A. No, I can't.  
 10 **Q. Did you tell any other performers**  
 11 **that you were deaf since birth?**  
 12 A. I don't recall if I did.  
 13 **Q. Did you tell Tommy Dreamer you were**  
 14 **deaf since birth?**  
 15 A. I don't recall.  
 16 **Q. So for other wrestlers who have**  
 17 **known you through your career and say you've**  
 18 **told them you were deaf since birth, would**  
 19 **they be lying?**  
 20 MR. SCIOLLA: Object to the form.  
 21 A. I couldn't be deaf since birth,  
 22 obviously.  
 23 **Q. If they said you told them that,**  
 24 **would they be lying?**  
 25 A. Not lying.

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1 (LoGrasso Exhibit 7, Article  
 2 entitled, "Big Vito talks about wanting  
 3 to work with Jeff Jarrett, and much  
 4 more," marked for identification, this  
 5 date.)  
 6 **Q. I've shown you what's been marked**  
 7 **as Exhibit 7, Mr. LoGrasso.**  
 8 **Again, do you recognize this as**  
 9 **your picture there?**  
 10 A. It's me in the picture.  
 11 **Q. And this is posted on Online World**  
 12 **of Wrestling. And it's a column, and it**  
 13 **quotes you as saying, "Big Vito On Wrestling**  
 14 **Deaf." "I don't advertise that I'm**  
 15 **handicapped. I am three-quarters deaf, and I**  
 16 **have been that way my whole life. I made it,**  
 17 **I did my thing."**  
 18 **Did you say that?**  
 19 A. What year was this?  
 20 **Q. It apparently was published in**  
 21 **2014, prior to this lawsuit.**  
 22 A. I couldn't have been deaf my whole  
 23 life.  
 24 **Q. Did you say that or didn't you?**  
 25 A. I did say it.

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1 **Q. Was that a lie when you told this**  
 2 **person that?**  
 3 A. Yes, it is a lie.  
 4 **Q. Who was that supposed to inspire?**  
 5 MR. SCIOLLA: Object to the form.  
 6 A. I was just going along with what I  
 7 had said previously.  
 8 **Q. Well, where had you said it**  
 9 **previously?**  
 10 A. When you asked me if I ever said it  
 11 before in that other article.  
 12 **Q. You state here "I don't advertise**  
 13 **that I'm handicapped."**  
 14 A. That's a time I know I said it.  
 15 You just mentioned Tommy Dreamer.  
 16 **Q. Well, why wouldn't you tell him,**  
 17 **then, that, look, I'm not really deaf. I**  
 18 **just said that to inspire people. I just**  
 19 **told a story"?**  
 20 A. Well, it was done to inspire people  
 21 that you could do things. Maybe I used poor  
 22 judgment.  
 23 **Q. Well, fine. But why didn't you**  
 24 **tell the truth in this interview and say, I'm**  
 25 **not deaf?**

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1 **So you were lying in 2014, too --**  
 2 MR. SCIOLLA: Object to the form.  
 3 **Q. -- is that right?**  
 4 A. No, sir.  
 5 **Q. Well, you're saying now this isn't**  
 6 **true. The statements you make here, "I'm**  
 7 **three-quarters deaf, and I have been that way**  
 8 **my whole life," is that true or is it false?**  
 9 A. I have not been three-quarters deaf  
 10 my whole life.  
 11 **Q. So then you told a lie, then,**  
 12 **right?**  
 13 A. In that, yes.  
 14 **Q. Do you remember appearing on an**  
 15 **interview called the Angry Marks Podcast in**  
 16 **February of 2014?**  
 17 A. No.  
 18 **Q. Did you tell that same tale on that**  
 19 **podcast --**  
 20 A. Don't recall.  
 21 **Q. -- of being deaf?**  
 22 MR. McDEVITT: We are going to mark  
 23 this.  
 24 (LoGrasso Exhibit 8, CD labeled,  
 25 "The Undisputed Wrestling Show with Big

126	<p>1 Vito &amp; Lucky Thirteen (February 2014),"</p> <p>2 marked for identification, this date.)</p> <p>3 <b>Q. Mr. LoGrasso, you are going to hear</b></p> <p>4 <b>a voice talking here, and I'm going to ask,</b></p> <p>5 <b>after you are done hearing it, whether you</b></p> <p>6 <b>recognize it as your voice saying what you</b></p> <p>7 <b>hear.</b></p> <p>8 MS. LACY: Can you please skip to</p> <p>9 4724. At least before it. If you can't</p> <p>10 get close, that's fine.</p> <p>11 (Video played and transcribed</p> <p>12 following:)</p> <p>13 "Voice: I was and this week I'm</p> <p>14 supposed to be getting a big boy. And I</p> <p>15 don't know, I've said this before, you</p> <p>16 know, I've mentioned it a few times in</p> <p>17 interviews. A lot of people don't know</p> <p>18 that I'm deaf. And, you know, and</p> <p>19 people ask me all the time, how the hell</p> <p>20 do you wrestle, if you're deaf, and how</p> <p>21 did you play ball? I was born deaf. I</p> <p>22 was born deaf, you know. And sometimes</p> <p>23 when I'm in the house, you know, I hear,</p> <p>24 my hearing is so accurate that I hear</p> <p>25 things all the time and every little</p>	128	<p>1 A. Yes.</p> <p>2 <b>Q. And that's you in a radio interview</b></p> <p>3 <b>in February of 2014 saying you were born</b></p> <p>4 <b>deaf, right?</b></p> <p>5 A. I said that. I was just saying it.</p> <p>6 <b>Q. And that was, again, before the</b></p> <p>7 <b>lawsuit you were telling people that you were</b></p> <p>8 <b>born deaf, right?</b></p> <p>9 A. That's what I was saying.</p> <p>10 <b>Q. And you said you had been like that</b></p> <p>11 <b>your whole life?</b></p> <p>12 A. That's what I said.</p> <p>13 <b>Q. So were you lying then, or are you</b></p> <p>14 <b>lying now?</b></p> <p>15 MR. SCIOLLA: Object to the form.</p> <p>16 A. No.</p> <p>17 <b>Q. Which is it?</b></p> <p>18 A. I can't hear you.</p> <p>19 <b>Q. Were you lying then or are you</b></p> <p>20 <b>lying now?</b></p> <p>21 A. I'm not lying.</p> <p>22 <b>Q. Were you born deaf?</b></p> <p>23 A. No, I couldn't be born deaf.</p> <p>24 <b>Q. You could be born deaf.</b></p> <p>25 <b>Why couldn't you be born deaf?</b></p>
127	<p>1 thing. And I'm so used to having a dog</p> <p>2 with me and, you know, just like I need</p> <p>3 that extra just in case I can't hear</p> <p>4 something or something is going on that</p> <p>5 I don't know. So unless you're a</p> <p>6 120-pound Rottie, his name is King, I'm</p> <p>7 going to change his name to Brother,</p> <p>8 come on, Brother. His name is going to</p> <p>9 be Brother. And he's two years old and</p> <p>10 he's 100, started out at 140. He's been</p> <p>11 training, so he's about 125 pounds right</p> <p>12 now. They hey, goodbye, somebody I</p> <p>13 could pal around with, somebody I could</p> <p>14 train with, somebody to have a companion</p> <p>15 with, somebody to be in the house with</p> <p>16 me and, you know, I don't advertise it.</p> <p>17 Like I said, I don't advertise it that</p> <p>18 I'm handicapped. I'm deaf. I'm</p> <p>19 three-quarters deaf, you know, and I've</p> <p>20 been like that my whole life.</p> <p>21 And you know, I made it. I did my</p> <p>22 thing and I just need, you know, I've</p> <p>23 been" --</p> <p>24 (End of transcription.)</p> <p>25 <b>Q. Is that your voice?</b></p>	129	<p>1 A. How I did get in the military?</p> <p>2 <b>Q. I don't know. Maybe you lied</b></p> <p>3 <b>there, too.</b></p> <p>4 A. How could you lie in an exam or a</p> <p>5 state physical?</p> <p>6 <b>Q. I've been in the military Mr.</b></p> <p>7 <b>LoGrasso. I know you how get into the</b></p> <p>8 <b>military?</b></p> <p>9 A. I know you've been in the military.</p> <p>10 <b>Q. Don't kid me about that. They'll</b></p> <p>11 <b>take anybody, especially in the time when you</b></p> <p>12 <b>were going in.</b></p> <p>13 A. It's 1983, it was peacetime. They</p> <p>14 take anybody?</p> <p>15 <b>Q. They took you.</b></p> <p>16 A. Thank you for the compliment, I</p> <p>17 appreciate it.</p> <p>18 <b>Q. What was your discharge?</b></p> <p>19 MR. SCIOLLA: Object to the form.</p> <p>20 Asked and answered.</p> <p>21 <b>Q. So you basically have been shown</b></p> <p>22 <b>now to have said repeatedly that you were</b></p> <p>23 <b>deaf since birth, right?</b></p> <p>24 A. I said this in interviews.</p> <p>25 <b>Q. Now, apart from interviews, you</b></p>



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1 also told a doctor that, too, didn't you?

2 A. Not that I recall.

3 Q. Is it fair to assume, Mr. LoGrasso,

4 that you would not lie to your doctors about

5 your condition?

6 A. I have hearing loss.

7 Q. But you would not lie to them,

8 would you?

9 A. No.

10 Q. I mean you want to get treated

11 accurately, don't you?

12 A. Yes, sir.

13 Q. And you know you can't get treated

14 accurately unless you tell them the truth

15 about your condition?

16 MR. SCIOLLA: Object to the form.

17 A. About my condition, yes.

18 (LoGrasso Exhibit 9, Medical

19 records, Bates Nos. Smith020516\_00031

20 through Smith020516\_00040, marked for

21 identification, this date.)

22 Q. Showing you what's been marked as

23 Exhibit 9, Mr. LoGrasso, which comes out of

24 your medical records from Dr. Smith. And if

25 I could, sir, I would direct your attention

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1 to page 3 of this document, under the last

2 paragraph on page 3.

3 Am I correct that what the doctor's

4 note states is "Congenitally deaf on left,

5 severe loss on right"?

6 Is that what your doctor's own note

7 states?

8 A. I'm reading it.

9 Q. Is that what they say, do you know

10 what that means?

11 A. That I'm deaf on the left and

12 severely lost on the right.

13 Q. Do you know what "congenitally

14 deaf" means?

15 A. I can't hear nothing out of the

16 left.

17 Q. No. Did you tell the doctor you

18 had been death since birth?

19 A. No. I just don't hear good out of

20 the ear.

21 Q. And there is a note that is made in

22 May of 2012. This is way before your

23 lawsuit, right? At the top right it says

24 "May 2012."

25 A. Right.

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1 Q. And then when you went back after

2 this lawsuit --

3 (LoGrasso Exhibit 10, Medical

4 records, Bates Nos. Smith020516\_00002

5 through Smith020516\_00006, marked for

6 identification, this date.)

7 Q. Showing you what's been marked as

8 Exhibit 10. This is the same Dr. Smith,

9 isn't it, that this is addressed to, from

10 Jennersville Neurology Center, do you see

11 that?

12 A. Jennersville.

13 Q. Jennersville at the top there?

14 A. Yes.

15 Q. Did you go to Jennersville

16 Neurology?

17 A. Yes.

18 Q. And you went there after this

19 lawsuit was brought, right?

20 That's March of 2015 --

21 A. Yes.

22 Q. -- two months after you brought

23 this lawsuit, right?

24 A. Yes.

25 Q. Knowing that you have to

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1 demonstrate some kind of symptoms to support

2 your brain injury claim, right?

3 MR. SCIOLLA: Object to the form,

4 argumentative.

5 Q. You know that by then, don't you?

6 You know it by then. You are trying to show

7 that you have symptoms associated with the

8 injuries that you're claiming in the lawsuit,

9 right?

10 MR. SCIOLLA: Object to form.

11 A. This was when I could get an

12 appointment to see a neurologist.

13 Q. Two months after your suit?

14 A. I was getting everything done,

15 because I was going by what Dr. Smith had

16 said, so this is where he referred me.

17 Q. And when you go to this

18 Jennersville, you tell them --

19 MR. McDEVITT: Strike that.

20 Q. If you look at the History of

21 Present Illness on the second page, it says,

22 "Mr. LoGrasso is a 50-year-old man referred

23 by Dr. Smith for evaluation of headaches and

24 head trauma. He has some difficulty giving a

25 concise history." And then it goes on to

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<p>1 state that you were "A former WWE wrestler, 2 completely stopped wrestling only five months 3 ago. He attributes most of his problems to 4 consequences of his wrestling career spanning 5 almost 30 years. This includes deafness in 6 the left ear, moderate hearing loss in the 7 right ear." Right?</p> <p>8 Isn't that what it says?</p> <p>9 A. I'm reading it.</p> <p>10 MR. SCIOLLA: Can you repeat the 11 question.</p> <p>12 Q. And my question, Mr. LoGrasso, is 13 whether you told the Jennersville folks that 14 your deafness issue you associated with your 15 wrestling career.</p> <p>16 A. Yes, I did tell them that.</p> <p>17 Q. So after the lawsuit, you weren't 18 telling them that you were deaf since birth, 19 you were selling them that it was associated 20 with your wrestling career?</p> <p>21 MR. SCIOLLA: Object to the form.</p> <p>22 A. I told -- he asked me how this 23 happened, and I said repeated blows to the 24 head and that I had, this had gotten worse 25 and worse during my wrestling career.</p>	<p>1 happening. So it was the doctors telling me 2 what is going on, and then I told him what 3 was happening. And now I know what 4 everything is, I put everything together. 5 But during this time I'm finding out like 6 everybody else, I'm finding out what is wrong 7 with me.</p> <p>8 Q. This was all done after you filed 9 the lawsuit where you had listed all the 10 symptoms, supposedly, of head injuries.</p> <p>11 A. This is all of what --</p> <p>12 Q. You knew the symptoms of the head 13 injuries by the time you went to the doctor, 14 didn't you, and filed a lawsuit about it; 15 isn't that true?</p> <p>16 A. Say that one more time.</p> <p>17 Q. You already filed a lawsuit where 18 you claimed a symptomatology of head injuries 19 in the lawsuit that you claimed and filed in 20 a Federal court, so you knew the symptoms by 21 the time you went to this doctor.</p> <p>22 A. I was getting checked out.</p> <p>23 Q. And you report to him you didn't 24 have any prolonged headaches, according to 25 what he says, and that you didn't have any</p>
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<p>1 Q. Did you tell him that you had 2 previously made statements to the effect that 3 you had been deaf since birth?</p> <p>4 A. No.</p> <p>5 Q. This also goes on to state, you 6 told him, this doctor, whoever he is -- 7 Handler, Dr. Handler, that you did not recall 8 having any significant post-concussive 9 symptoms during your career, do you see that?</p> <p>10 A. I was not educated on what they 11 were, so I didn't know what I was -- I was 12 finding out as I was going along what was 13 going on with me.</p> <p>14 Q. Well, he says, "He did not recall 15 having any significant post-concussive 16 systems during his career, such as loss of 17 consciousness, prolonged headaches, nausea, 18 balance problems or memory loss." 19 That's what he says, right?</p> <p>20 A. That's what it says there.</p> <p>21 Q. And that's what -- you claim those 22 things now, the prolonged headaches --</p> <p>23 A. That's what I'm suffering from, and 24 that's what I didn't know what was going on, 25 because I wasn't educated on what was</p>	<p>1 significant post-concussion symptoms during 2 your career, which he says only ended a short 3 time ago.</p> <p>4 MR. SCIOLLA: Object to the form 5 and characterization.</p> <p>6 Q. Right?</p> <p>7 A. I can't speak for the doctor's 8 notes.</p> <p>9 Q. Do you have some reason to think 10 they don't reflect what you told him?</p> <p>11 A. This is what is his observation, 12 and I'm telling you what I was going through.</p> <p>13 Q. And he's basing his --</p> <p>14 MR. McDEVITT: Strike that.</p> <p>15 Q. Do you agree that every symptom you 16 claim is a subjective symptom?</p> <p>17 MR. SCIOLLA: Object to the form.</p> <p>18 A. If you could say that one more 19 time.</p> <p>20 Q. Every symptom you now claim is 21 subjective, right?</p> <p>22 MR. SCIOLLA: Object to the form.</p> <p>23 A. "Subjective" meaning?</p> <p>24 Q. You claim you have headaches, but 25 it can't be verified.</p>