

Exhibit 18

UNITED STATES DISTRICT COURT

DISTRICT OF CONNECTICUT

-----x
RUSS McCULLOUGH, et al., No. 3:15-cv-01074 (VLB)
 Lead Case

Plaintiffs,

-v-

WORLD WRESTLING
ENTERTAINMENT, INC.,

Defendant.

-----x
EVAN SINGLETON and VITO No. 3:15-cv-00425 (VLB)
LOGRASSO, Consolidated Case

Plaintiffs,

-v-

WORLD WRESTLING
ENTERTAINMENT, INC.,

Defendants.

-----x

VIDEOTAPED DEPOSITION OF

EVAN M. SINGLETON

Philadelphia, Pennsylvania

May 11, 2016

9:29 a.m.

Reported by:
Josephine H. Fassett, RPR, CCR
Job No. 44298

2	<p>1 May 11, 2016</p> <p>2 Philadelphia, Pennsylvania</p> <p>3 9:29 a.m.</p> <p>4</p> <p>5 T R A N S C R I P T of the Videotaped</p> <p>6 Deposition of EVAN M. SINGLETON, pursuant to the</p> <p>7 Federal Rules of Civil Procedure, held at the offices</p> <p>8 of Kleinbard LLC, One Liberty Place, 1650 Market</p> <p>9 Street, Philadelphia, Pennsylvania, on Wednesday, May</p> <p>10 11, 2016, commencing at approximately 9:29 a.m.,</p> <p>11 before Josephine H. Fassett, a Registered</p> <p>12 Professional Reporter, Certified Court Reporter and</p> <p>13 Notary Public.</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	4	
3	<p>1 A P P E A R A N C E S :</p> <p>2</p> <p>3 ATTORNEYS FOR PLAINTIFFS:</p> <p>4 POGUST BRASLOW & MILLROOD LLC</p> <p>5 Eight Tower Bridge</p> <p>6 161 Washington Street</p> <p>7 Suite 940</p> <p>8 Conshohocken, Pennsylvania 19428</p> <p>9 610.941.4204</p> <p>10 BY: HARRIS L. POGUST, ESQ.</p> <p>11 hpogust@pbmattorneys.com</p> <p>12</p> <p>13 -and-</p> <p>14</p> <p>15 ATTORNEYS FOR PLAINTIFFS:</p> <p>16 KYROS LAW OFFICES</p> <p>17 17 Miles Road</p> <p>18 Hingham, Massachusetts 02043</p> <p>19 800.934.2921</p> <p>20 BY: KONSTANTINE W. KYROS, ESQ.</p> <p>21 kon@kyroslaw.com</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 A P P E A R A N C E S (cont'd.) :</p> <p>2</p> <p>3 ATTORNEYS FOR DEFENDANT:</p> <p>4 K&L GATES LLP</p> <p>5 210 Sixth Avenue</p> <p>6 Pittsburgh, Pennsylvania 15222</p> <p>7 412.355.6500</p> <p>8 BY: JERRY S. McDEVITT, ESQ.</p> <p>9 jerry.mcdevitt@klgates.com</p> <p>10 STEFANIE M. LACY, ESQ.</p> <p>11 stefanie.lacy@klgates.com</p> <p>12</p> <p>13</p> <p>14 A L S O P R E S E N T :</p> <p>15 JOSEPH WILLS, Videographer</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	5

6	<p>1 -----EXHIBITS-----</p> <p>2 SINGLETON DESCRIPTION PAGE</p> <p>3 Exhibit 8 Adam Mercer @MercerWWE Twitter 135</p> <p>4 Tweets</p> <p>5 Exhibit 9 Adam Mercer @WWE Mercer Twitter 140</p> <p>6 Tweets</p> <p>7 Exhibit 10 Evan Singleton Talent 143</p> <p>8 Questionnaire</p> <p>9 Exhibit 11 World Wrestling Entertainment, 145</p> <p>10 Inc. Booking Contract</p> <p>11 Exhibit 12 Letter dated May 21, 2012 148</p> <p>12</p> <p>13 Exhibit 13 Candace Renshaw Facebook Page 150</p> <p>14 Exhibit 14 Class Action Complaint 159</p> <p>15 Exhibit 15 Plaintiffs' First Amended 183</p> <p>16 Complaint</p> <p>17 Exhibit 16 Plaintiffs' Second Amended 209</p> <p>18 Complaint</p> <p>19 Exhibit 17 Concussion Evaluation dated 219</p> <p>20 2/21/2013</p> <p>21 Exhibit 18 Followup Note on Evan Singleton 228</p> <p>22 dated January 18, 2013</p> <p>23 Exhibit 19 E-mail dated October 1, 2012 229</p> <p>24 Exhibit 20 Singleton vs. Erick Rowan 237</p> <p>25 6/17/2012 and 9/27/2012 CD</p>	8	<p>1 (Whereupon, on the video record.)</p> <p>2 THE VIDEOGRAPHER: We're now on the</p> <p>3 record.</p> <p>4 My name is Joseph Wills, the videographer</p> <p>5 from David Feldman Worldwide.</p> <p>6 This is a video deposition in the United</p> <p>7 States District Court for the District of</p> <p>8 Connecticut.</p> <p>9 Today's date is May 11, 2016. The video</p> <p>10 time is 9:29 a.m.</p> <p>11 This deposition is being held at 1650</p> <p>12 Market Street, Philadelphia, Pennsylvania, in</p> <p>13 the matters of McCullough, et al. versus World</p> <p>14 Wrestling Entertainment, Incorporated, and</p> <p>15 Singleton and LoGrasso versus World Wrestling</p> <p>16 Entertainment, Incorporated.</p> <p>17 The deponent is Evan Singleton.</p> <p>18 Would all counsel please identify</p> <p>19 themselves.</p> <p>20 MR. McDEVITT: I'm Jerry McDevitt. I</p> <p>21 represent WWE.</p> <p>22 MR. POGUST: Harris Pogust, Pogust</p> <p>23 Braslow & Millroad, on behalf of the</p> <p>24 plaintiffs.</p> <p>25 MR. KYROS: Konstantine Kyros, Kyros Law,</p>
7	<p>1 -----EXHIBITS-----</p> <p>2 SINGLETON DESCRIPTION PAGE</p> <p>3 Exhibit 21 Singleton Leg Twitching CD 249</p> <p>4 Exhibit 22 Evan Singleton Instagram Account 249</p> <p>5 Page</p> <p>6 Exhibit 23 Evan Singleton Instagram Account 252</p> <p>7 Page</p> <p>8 Exhibit 24 Evan Singleton Instagram Account 256</p> <p>9 Page</p> <p>10 Exhibit 25 Evan Singleton Instagram Account 258</p> <p>11 Page</p> <p>12 Exhibit 26 Evan Singleton Instagram Account 259</p> <p>13 Page</p> <p>14 Exhibit 27 Evan Singleton Facebook Account 263</p> <p>15 Page</p> <p>16 Exhibit 28 Evan Singleton Instagram Account 265</p> <p>17 Page Photograph</p> <p>18 Exhibit 29 Evan Singleton Instagram Account 268</p> <p>19 Page</p> <p>20 Exhibit 30 Evan Singleton Instagram Account 268</p> <p>21 Page</p> <p>22 Exhibit 31 Evan Singleton Instagram Account 270</p> <p>23 Page</p> <p>24 Exhibit 32 Multiple Photographs 271</p> <p>25 Exhibit 33 CD 274</p>	9	<p>1 on behalf of the plaintiffs.</p> <p>2 THE VIDEOGRAPHER: Will the court</p> <p>3 reporter please swear in the witness.</p> <p>4 E V A N M. S I N G L E T O N, the witness, having</p> <p>5 been duly sworn, was examined and testified</p> <p>6 under oath as follows:</p> <p>7 EXAMINATION BY</p> <p>8 MR. McDEVITT:</p> <p>9 Q. Mr. Singleton, my name is Jerry McDevitt.</p> <p>10 I represent the WWE, so I'll be asking you questions</p> <p>11 today.</p> <p>12 A. Okay.</p> <p>13 Q. And I'd like to begin by asking you to</p> <p>14 state formally your name and address.</p> <p>15 A. My name is Evan Mitchell Singleton. My</p> <p>16 address is 5201 Summerfield Drive, Mount Joy,</p> <p>17 Pennsylvania 17552.</p> <p>18 Q. How far is Mount Joy from here?</p> <p>19 A. About an hour and a half.</p> <p>20 Q. Is that a small town?</p> <p>21 A. Uhm... little bit, yes.</p> <p>22 Q. How many people live there?</p> <p>23 A. I don't know offhand.</p> <p>24 Q. You the biggest guy in town?</p> <p>25 A. If not, I'm pretty close.</p>

26	<p>1 Q. Were you the biggest person that you 2 competed against -- or, strike that. 3 Was anybody bigger than you that you 4 competed against? 5 A. Yes. 6 Q. And how did you do in the state? 7 A. I ended up taking eighth in states. 8 Q. Eighth. Okay. 9 And after you did high school wrestling, 10 you then went and trained somewhere else before you 11 went to WWE, correct? 12 A. Yes. 13 Q. What was the name of that outfit? 14 A. CZW, Combat Zone Wrestling. 15 Q. And how long did you train with them? 16 A. Couple of months. 17 Q. And what was the nature of your training? 18 A. Very basic in-ring activity. Running the 19 ropes. Learn -- learning how to do simple moves, 20 stuff like that, working on my skills. 21 Q. What kind of moves did you learn? 22 A. Clothesline. How to throw a punch. How 23 to kick. How to roll. Just the basic stuff like 24 that. 25 Q. Did you learn flat back?</p>	28	<p>1 hurt? 2 MR. POGUST: Objection. 3 A. I don't remember, no. 4 Q. Did you tuck your chin? 5 A. Not that I remember. 6 Q. So if you didn't tuck your chin, you're 7 going to get hurt, right? 8 A. Yeah. 9 Q. And you were told that, right? 10 A. No. 11 Q. You weren't told to tuck your chin when 12 you executed the move, that's what -- 13 A. No, I was. 14 Q. You were? 15 A. Yeah. 16 Q. So you knew before that you were doing 17 that move that the key in not getting hurt was to 18 tuck your chin. 19 MR. POGUST: Objection. 20 Q. Right? 21 A. Yes. 22 Q. And you didn't tuck your chin and you got 23 hurt, right? 24 A. I don't -- I don't remember. I -- I 25 don't remember.</p>
27	<p>1 A. Yes. 2 Q. What is a flat back? 3 A. It's a bump. 4 Q. What's that mean? 5 A. Falling flat on your back or crawling and 6 spreading your arms out. 7 Q. So as not to hurt yourself? 8 A. Right. 9 Q. And when you do that move, what are you 10 supposed to do with your head? 11 A. Tuck it. 12 Q. Tuck your chin? 13 A. Yes. 14 Q. Correct? The same thing you're supposed 15 to do when you get choke slammed, right? 16 A. Yes. 17 Q. And you didn't do that when you got hurt, 18 right? 19 A. I don't -- 20 MR. POGUST: Objection. 21 A. I don't remember. 22 Q. Did you make the move wrong when you got 23 hurt? 24 A. I'm sorry? 25 Q. Did you make the move wrong when you got</p>	29	<p>1 Q. Well, did you understand, Mr. Singleton, 2 when you walked into a wrestling ring that there was 3 a risk of injury? 4 A. Yes. 5 Q. And you knew that the minute you walk in 6 a ring, right? 7 A. Yes. 8 Q. You know that if you don't perform moves 9 correctly, you could hurt your opponent, right? 10 A. Yes. 11 Q. And you know if they don't perform them 12 correctly, they can hurt you? 13 A. Yes. 14 Q. And that's not the object, is it, it's 15 not to hurt each another? 16 A. No. 17 Q. It's supposed to be entertainment, right? 18 A. Yes. 19 Q. You're not really punching the person, 20 you're simulating that you're punching the person, 21 correct? 22 A. Yes. 23 Q. And what does the term selling mean to 24 you? 25 A. Selling is if somebody throws one of</p>