

# Exhibit 2

UNITED STATES DISTRICT COURT

DISTRICT OF CONNECTICUT

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RUSS MCCULLOUGH, et al.,

Plaintiff,

vs.

No. 3:15-cv-01074 (VLB)

WORLD WRESTLING ENTERTAINMENT, INC.,

Defendant.

-----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

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<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>
<p>May 18, 2016 9:35 a.m.</p> <p>Videotaped Deposition of VITO LOGRASSO, held at the offices of Kleinbard, LLC, 1650 Market Street, Philadelphia, Pennsylvania, pursuant to notice, before Jennifer Ocampo-Guzman, a Certified Real-Time Shorthand Reporter and Notary Public of the Commonwealth of Pennsylvania.</p>	<p>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

1 MR. NORRIS: Anthony Norris, Kyros  
 2 Law Offices, for the plaintiff.  
 3 MR. McDEVITT: Jerry McDevitt for  
 4 WWE.  
 5 MS. LACY: Stefanie Lacy for WWE.  
 6 V I T O J. L O G R A S S O, called  
 7 as a witness, having been duly sworn, was  
 8 examined and testified as follows:  
 9 EXAMINATION BY  
 10 MR. McDEVITT:  
 11 **Q. Would you state your name for the**  
 12 **record, please?**  
 13 A. Veto J. LoGrasso.  
 14 **Q. Have you ever testified under oath**  
 15 **before?**  
 16 A. No, sir.  
 17 **Q. Do you understand the oath you've**  
 18 **just taken?**  
 19 A. Yes, sir.  
 20 **Q. And you understand it obligates you**  
 21 **to tell the truth, even if telling the truth**  
 22 **is against your interest?**  
 23 A. Yes.  
 24 **Q. And even if the truth is contrary**  
 25 **to what you said in court pleadings?**

7

1 A. Yes, sir.  
 2 **Q. What's your date of birth, sir?**  
 3 A. 6/18/64.  
 4 **Q. And what is your current address?**  
 5 A. 12 Flemming Drive, Coatesville,  
 6 Pennsylvania, 19320.  
 7 **Q. Do you own that property?**  
 8 A. No, I do not. My wife does.  
 9 **Q. How long have you lived there?**  
 10 A. Two years, I think.  
 11 **Q. Does anybody else live there**  
 12 **besides you and your wife?**  
 13 A. No, just us.  
 14 **Q. What is your wife's name?**  
 15 A. Becca, B-E-C-A -- C-C-A.  
 16 **Q. What was her maiden name?**  
 17 A. Ford.  
 18 **Q. And am I correct, she was also a**  
 19 **previous performer in the wrestling business?**  
 20 A. Yes, sir.  
 21 **Q. But not with WWE, correct?**  
 22 A. No.  
 23 **Q. She was with WCW?**  
 24 A. No.  
 25 **Q. Who did she perform for?**

8

1 A. She was more of an indie wrestler.  
 2 **Q. When were you married?**  
 3 A. September 27, 2014.  
 4 If I got that wrong, I die.  
 5 **Q. We're going ask her whether you**  
 6 **were right.**  
 7 MR. SCIOLLA: Jerry, I don't meant  
 8 interrupt, but as you can see, he's  
 9 leaning toward you. As much as you can,  
 10 keep your voice up so that he can hear.  
 11 MR. McDEVITT: If you can't hear or  
 12 understand any question I ask you, just  
 13 tell me and I will be glad to raise my  
 14 voice, but I don't want to appear like  
 15 I'm yelling at you.  
 16 I may yell at you anyway, but --  
 17 THE WITNESS: It's okay.  
 18 **Q. But seriously, if you cannot hear**  
 19 **me, tell me.**  
 20 A. Okay.  
 21 **Q. Is your wife disabled?**  
 22 A. Yes.  
 23 **Q. And what's the nature of her**  
 24 **disability?**  
 25 A. She has three herniated disks and

9

1 spinal stenosis.  
 2 **Q. And prior to moving to**  
 3 **Pennsylvania, you lived in Florida?**  
 4 A. Yes, sir.  
 5 **Q. When did you move to Pennsylvania?**  
 6 A. Let's see. I'm not sure of the  
 7 day. I know it was in 2014, I think.  
 8 **Q. The year is fine. The year 2014?**  
 9 A. I think so, yeah.  
 10 **Q. Why did you move back to**  
 11 **Pennsylvania?**  
 12 A. Because I closed my wrestling  
 13 school, and I decided to get married.  
 14 **Q. Why couldn't you stay in Florida?**  
 15 A. My wife lives here, and she has two  
 16 children here.  
 17 **Q. Is it true you hate living in**  
 18 **Pennsylvania?**  
 19 A. Say that one more time?  
 20 **Q. You hate living in Pennsylvania?**  
 21 A. I'm not fond of Pennsylvania. The  
 22 people are nice, but I'm not too fond of  
 23 Pennsylvania.  
 24 **Q. Have you told some of your**  
 25 **healthcare providers you hate living in**

226	<p>1 MR. McDEVITT: Strike that.</p> <p>2 <b>Q. Did you read the judge's decision</b></p> <p>3 <b>on our motion to dismiss?</b></p> <p>4 A. Did I read the judge's decision on?</p> <p>5 <b>Q. Yes, we moved to dismiss your case,</b></p> <p>6 <b>and she issued a written opinion.</b></p> <p>7 <b>Did you read it?</b></p> <p>8 A. I believe I did.</p> <p>9 <b>Q. And what is your understanding of</b></p> <p>10 <b>the claim that you have in this case that</b></p> <p>11 <b>remains?</b></p> <p>12 MR. SCIOLLA: I'll object to the</p> <p>13 form, but you can answer.</p> <p>14 A. I'm really not understanding what</p> <p>15 you're saying, so I really can't answer it.</p> <p>16 <b>Q. Well, what is the claim you are</b></p> <p>17 <b>making against WWE?</b></p> <p>18 A. About not providing information</p> <p>19 about head injuries and CTE during my time</p> <p>20 there. And not getting proper care, not</p> <p>21 getting proper medical treatment, not getting</p> <p>22 evaluated for head trauma.</p> <p>23 <b>Q. What specific information do you</b></p> <p>24 <b>think they should have told you?</b></p> <p>25 MR. SCIOLLA: Object to the form,</p>	228	<p>1 his, you know, you know, on his</p> <p>2 recommendation to help me along.</p> <p>3 <b>Q. I'm going to ask you for the third</b></p> <p>4 <b>and last time, what information about head</b></p> <p>5 <b>injuries are you contending that WWE should</b></p> <p>6 <b>have given you that you didn't know?</b></p> <p>7 A. They should have given me the</p> <p>8 information that there was something that</p> <p>9 could be happening to your head, some</p> <p>10 awareness or some knowledge of head trauma.</p> <p>11 <b>Q. And what is the something that</b></p> <p>12 <b>could be happening to your head that they</b></p> <p>13 <b>should have told you about?</b></p> <p>14 A. That you can suffer from a</p> <p>15 concussion and that you can, you don't have</p> <p>16 to be knocked out to get a concussion.</p> <p>17 Because that was my understanding of what a</p> <p>18 concussion was.</p> <p>19 <b>Q. Anything else they should have told</b></p> <p>20 <b>you that you didn't know?</b></p> <p>21 MR. SCIOLLA: Object to the form.</p> <p>22 A. I mean they didn't give us -- I</p> <p>23 mean you have a drug policy that goes for</p> <p>24 addicts, for drug addiction, for alcohol</p> <p>25 addiction, but you have nothing in place for</p>
227	<p>1 calls for speculation.</p> <p>2 A. Well, being that you're in -- there</p> <p>3 is no time or rest between wrestling and you</p> <p>4 go in every day, you know, and you're on the</p> <p>5 road and you're banging your body around, you</p> <p>6 know, there was no evaluation on how my head</p> <p>7 was or any evaluation on how my physical</p> <p>8 well-being was. And WWE never sought to</p> <p>9 evaluate me at any time and never, you know,</p> <p>10 sought to check and see if I was okay, if I</p> <p>11 had any, any problems.</p> <p>12 <b>Q. My question was, what specific</b></p> <p>13 <b>information do you contend they should have</b></p> <p>14 <b>told you that they didn't tell you?</b></p> <p>15 MR. SCIOLLA: Same objection.</p> <p>16 A. When they -- well, the information</p> <p>17 they should have done and should have</p> <p>18 provided was an evaluation or a physical of</p> <p>19 some sort to see if I was suffering from any</p> <p>20 head trauma, if I had any head injuries, if I</p> <p>21 needed any assistance.</p> <p>22 I was getting the B-12 shots</p> <p>23 because I was fatigued, and I did have the</p> <p>24 headaches, you know. And I was feeling</p> <p>25 lethargic and Dr. Rios was giving me those on</p>	229	<p>1 people who suffer head injuries or people who</p> <p>2 suffer from headaches or depression or people</p> <p>3 who have, you know, irregularities with their</p> <p>4 brain.</p> <p>5 <b>Q. You mean former talent? You mean</b></p> <p>6 <b>former talent?</b></p> <p>7 A. Former talent, former employees.</p> <p>8 You make it aware that there is a drug</p> <p>9 policy, but that's only if you have a drug</p> <p>10 addiction. And you have drug addiction,</p> <p>11 alcohol addiction, but there is nothing in</p> <p>12 place for the talent to where they can get</p> <p>13 help if they need it for head injuries.</p> <p>14 And you offer this through your</p> <p>15 program, but there is nothing for guys like</p> <p>16 myself who have these problems, and all I'm</p> <p>17 looking for is help.</p> <p>18 <b>Q. And who do you contend at WWE was</b></p> <p>19 <b>engaged in fraud, who specifically?</b></p> <p>20 A. Huh?</p> <p>21 <b>Q. Do you contend that people at WWE</b></p> <p>22 <b>were engaged in trying to defraud you?</b></p> <p>23 MR. SCIOLLA: Object to the form,</p> <p>24 to the extent it calls for a legal</p> <p>25 conclusion or evaluation.</p>

230	<p>1 You can answer.</p> <p>2 A. I didn't come out and say that they</p> <p>3 tried to defraud me. I said they didn't give</p> <p>4 me any awareness or knowledge.</p> <p>5 <b>Q. Do you contend that somebody at WWE</b></p> <p>6 <b>was trying to defraud you?</b></p> <p>7 MR. SCIOLLA: Object to the form.</p> <p>8 A. And my answer is, nobody gave me</p> <p>9 the awareness or the knowledge for head</p> <p>10 injury and for the trouble I was having.</p> <p>11 <b>Q. Well, that's not the question I'm</b></p> <p>12 <b>asking you, sir.</b></p> <p>13 <b>Who at WWE, if anybody, are you</b></p> <p>14 <b>accusing of engaging in fraud towards you?</b></p> <p>15 A. I didn't accuse anybody of saying</p> <p>16 fraud. All I said is they did not provide</p> <p>17 any information about CTE awareness or</p> <p>18 concussions.</p> <p>19 <b>Q. And do you think, sir, that maybe a</b></p> <p>20 <b>reason that they wouldn't tell you anything</b></p> <p>21 <b>about CTE is either because they didn't know</b></p> <p>22 <b>it either, or they probably figured you might</b></p> <p>23 <b>be reading it in the newspaper like everybody</b></p> <p>24 <b>else did?</b></p> <p>25 MR. SCIOLLA: Object to the form</p>	232	<p>1 A. Might have heard the name. I'm not</p> <p>2 a Pittsburgh Steeler fan, so, I'm sorry.</p> <p>3 <b>Q. In 2005 you don't recall hearing</b></p> <p>4 <b>any talk about CTE inside of WWE's locker</b></p> <p>5 <b>rooms from anybody, right?</b></p> <p>6 MR. SCIOLLA: Objection, asked and</p> <p>7 answered.</p> <p>8 A. No.</p> <p>9 <b>Q. How about in 2006, did you hear any</b></p> <p>10 <b>talk in the locker rooms in 2006 about CTE?</b></p> <p>11 A. No.</p> <p>12 <b>Q. Did you hear any wrestlers talking</b></p> <p>13 <b>about it?</b></p> <p>14 A. Not that I recall.</p> <p>15 <b>Q. Did you hear any management talking</b></p> <p>16 <b>about it?</b></p> <p>17 A. Not that I recall.</p> <p>18 <b>Q. Did you hear Vince McMahon ever</b></p> <p>19 <b>talk about it?</b></p> <p>20 A. Not that I recall.</p> <p>21 <b>Q. And you left in 2007, right?</b></p> <p>22 A. Uh-huh.</p> <p>23 <b>Q. And Chris Benoit was a friend of</b></p> <p>24 <b>yours, wasn't he?</b></p> <p>25 A. I wrestled with him up until May of</p>
231	<p>1 and calls for speculation.</p> <p>2 A. Well, maybe.</p> <p>3 <b>Q. Are you trying to tell me that in</b></p> <p>4 <b>all the years since 2007, that you never read</b></p> <p>5 <b>anything about CTE?</b></p> <p>6 A. I was not -- it didn't -- I didn't</p> <p>7 know up until 2014 that I had any of these</p> <p>8 problems that could contribute to me having</p> <p>9 CTE.</p> <p>10 <b>Q. That's not my question.</b></p> <p>11 <b>Did you read in the newspapers</b></p> <p>12 <b>anything about CTE?</b></p> <p>13 A. No.</p> <p>14 <b>Q. Well, let's take, for example, in</b></p> <p>15 <b>2005. Were you in the WWE locker rooms in</b></p> <p>16 <b>2005?</b></p> <p>17 A. Yes.</p> <p>18 <b>Q. Was there any talk about CTE in the</b></p> <p>19 <b>locker rooms in 2005?</b></p> <p>20 A. No.</p> <p>21 <b>Q. Was there any talk that you heard</b></p> <p>22 <b>of in 2005 about Mike Webster?</b></p> <p>23 A. I don't know who Mike Webster is.</p> <p>24 <b>Q. Do you know the former Pittsburgh</b></p> <p>25 <b>Steeler Mike Webster?</b></p>	233	<p>1 2007.</p> <p>2 <b>Q. And Chris Benoit was a friend of</b></p> <p>3 <b>yours, wasn't he?</b></p> <p>4 A. We worked together in the WWE.</p> <p>5 <b>Q. Was Chris Nowinski a friend of</b></p> <p>6 <b>yours?</b></p> <p>7 A. He was before me.</p> <p>8 <b>Q. Did you know him?</b></p> <p>9 A. I might have met him once or twice.</p> <p>10 I think he was there in 2003.</p> <p>11 <b>Q. Did you watch Tough Enough?</b></p> <p>12 A. I don't watch Tough Enough.</p> <p>13 <b>Q. Did you know his persona, Chris</b></p> <p>14 <b>Harvard?</b></p> <p>15 A. I really didn't.</p> <p>16 <b>Q. You never saw him perform?</b></p> <p>17 A. I can't say that I have. I wasn't</p> <p>18 a Tough Enough watch, I wasn't a fan of the</p> <p>19 show.</p> <p>20 <b>Q. Well, he made it to the main</b></p> <p>21 <b>roster. Did you watch him when he made it to</b></p> <p>22 <b>the main roster?</b></p> <p>23 A. I might have remembered him being</p> <p>24 on the main roster with Chris Nowinski. But</p> <p>25 that's about it. I never watched him, per</p>

246

1 (LoGrasso Exhibit 22, Twitter  
 2 update, marked for identification, this  
 3 date.)  
 4 **Q. I've handed you what's been marked  
 5 as exhibit -- what number is that?**  
 6 A. 22.  
 7 **Q. -- 22.**  
 8 **Can you confirm that is a document  
 9 that you authored?**  
 10 THE WITNESS: You want me to give  
 11 them --  
 12 MR. SCIOLLA: No, I have it.  
 13 MR. McDEVITT: He has a copy.  
 14 **Q. Did you write that on April 22nd of  
 15 this year?**  
 16 A. Yes, I did.  
 17 **Q. You say, "Dr. Omalu, working on my  
 18 behalf and on the behalf of others. More is  
 19 coming. What a ride this has been." What  
 20 does that mean?**  
 21 A. I believe that Dr. Omalu is working  
 22 as a consultant with -- with the lawyers on  
 23 the CTE study.  
 24 **Q. And has he examined you?**  
 25 A. Never once. I never met the man.

247

1 **Q. What did you mean "More is coming"?**  
 2 A. Meaning that there is more to this  
 3 that is coming, basically. It was just an  
 4 out-there statement.  
 5 **Q. Well, what is "More"?**  
 6 A. Just an out-there statement.  
 7 **Q. Let me go back to a question I  
 8 asked you before.**  
 9 **Can you identify anything that  
 10 anybody at WWE, beyond what you testified to,  
 11 did that you regard as deceiving you or  
 12 fraudulent towards you?**  
 13 A. Deceiving or fraudulent towards me,  
 14 if you could explain in what manner you mean.  
 15 **Q. Well, in any manner, did they say  
 16 or do anything to you that deceived you, had  
 17 misled you in any way?**  
 18 A. I guess as far as being misled, it  
 19 goes about time when I was going back and  
 20 forth to, when I was going back and forth to  
 21 Louisville and Deep South Wrestling, and I  
 22 was doing a new gimmick down there and Mike  
 23 and Steve Curran were working for that  
 24 company, and I believe Mike was in charge of  
 25 talent relations, along with the Steve

248

1 Curran, and they came down to look at my new  
 2 gimmick. And they had told me that I was  
 3 going up to TV the week -- the next week, and  
 4 then the following week I was released from  
 5 WWE.  
 6 **Q. Anything else?**  
 7 A. That's about it.  
 8 **Q. You've made allegations about Bill  
 9 DeMott in this case. You never trained under  
 10 Bill DeMott, did you?**  
 11 A. At Deep South.  
 12 **Q. You had been a professional  
 13 wrestler for how many decades by the time you  
 14 went to Deep South?**  
 15 A. I still abided by his rules,  
 16 because it was his training facility.  
 17 **Q. How many decades had you been a  
 18 wrestler?**  
 19 A. I think it was up to 15 years at  
 20 the time.  
 21 **Q. And when you went down there, you  
 22 went down there as a WWE Superstar to help  
 23 those people, did you?**  
 24 A. I went down there to help and keep  
 25 training.

249

1 **Q. And you were by that time a fully  
 2 accomplished professional wrestler, fair to  
 3 say?**  
 4 A. You always could learn some things.  
 5 **Q. And that was after these matches  
 6 with Steve Regal that you lied about this  
 7 morning, correct?**  
 8 MR. SCIOLLA: Objection.  
 9 A. So your point being?  
 10 **Q. So whatever you ran into with Bill  
 11 DeMott, that is after these matches that you  
 12 lied about this morning, isn't it?**  
 13 MR. SCIOLLA: Objection to the  
 14 characterization.  
 15 A. You didn't tell me what Bill DeMott  
 16 did that I could say yes or no to.  
 17 **Q. Well, you didn't even encounter  
 18 Bill DeMott until what, 2007? When did you  
 19 go down there, in 2007?**  
 20 A. I'm sorry?  
 21 **Q. When did you go down to Deep South?**  
 22 A. When did go down to Deep South?  
 23 **Q. Yes.**  
 24 A. I was going down to Deep South, I  
 25 believe from 2005 to 2007, because I would go

250	<p>1 on the weeks that I was off.</p> <p>2 <b>Q. Was DeMott a Facebook friend of</b></p> <p>3 <b>yours?</b></p> <p>4 A. No.</p> <p>5 <b>Q. Never?</b></p> <p>6 A. He was at one time, I believe.</p> <p>7 <b>Q. And when was that?</b></p> <p>8 A. I'm not even sure.</p> <p>9 <b>Q. Did you ever read any congressional</b></p> <p>10 <b>testimony in the Benoit matter?</b></p> <p>11 A. Read congressional testimony?</p> <p>12 <b>Q. Yeah.</b></p> <p>13 A. No.</p> <p>14 <b>Q. Are you a boxing fan?</b></p> <p>15 A. A boxing fan?</p> <p>16 <b>Q. Yes.</b></p> <p>17 A. Yes, sir.</p> <p>18 <b>Q. And do you follow Muhammad Ali?</b></p> <p>19 A. Pretty much.</p> <p>20 <b>Q. And have you followed his</b></p> <p>21 <b>deterioration in health?</b></p> <p>22 A. I know of it. I don't follow it,</p> <p>23 as per se.</p> <p>24 <b>Q. And what is your understanding of</b></p> <p>25 <b>what caused his deterioration?</b></p>	252	<p>1 <b>Q. And he didn't seen talk any more,</b></p> <p>2 <b>does he?</b></p> <p>3 A. Not that I know of, sir.</p> <p>4 MR. SCIOLLA: Objection, calls for</p> <p>5 speculation.</p> <p>6 <b>Q. And he's been that way for quite a</b></p> <p>7 <b>while, hasn't he?</b></p> <p>8 MR. SCIOLLA: Objection.</p> <p>9 A. I think so.</p> <p>10 <b>Q. And that's another instance where</b></p> <p>11 <b>you could have deduced that that man suffered</b></p> <p>12 <b>brain damage from blows to the head, right?</b></p> <p>13 MR. SCIOLLA: Objection.</p> <p>14 A. I would assume so.</p> <p>15 <b>Q. You indicated I think --</b></p> <p>16 MR. McDEVITT: Strike that.</p> <p>17 <b>Q. When did you say your last match in</b></p> <p>18 <b>2007 with WWE in the main roster was?</b></p> <p>19 A. I didn't.</p> <p>20 <b>Q. When was that?</b></p> <p>21 A. I'm not sure.</p> <p>22 <b>Q. It was prior to June though, wasn't</b></p> <p>23 <b>it.</b></p> <p>24 <b>I mean, you were gone by the time</b></p> <p>25 <b>Benoit had murdered his wife, right?</b></p>
251	<p>1 MR. SCIOLLA: Objection, calls for</p> <p>2 speculation.</p> <p>3 A. It's a lot of blows to the head.</p> <p>4 <b>Q. Did you see him light the Olympic</b></p> <p>5 <b>torch in Atlanta several years ago?</b></p> <p>6 A. I might have.</p> <p>7 <b>Q. Did you generally watch the</b></p> <p>8 <b>Olympics?</b></p> <p>9 A. I watched the Olympics. I might</p> <p>10 have watched him do it. I'm not sure.</p> <p>11 <b>Q. Are you familiar with what I'm</b></p> <p>12 <b>talking about? How he came out and lit the</b></p> <p>13 <b>Olympic torch in Atlanta in 1996?</b></p> <p>14 A. Vaguely.</p> <p>15 <b>Q. And if you watched that in 1996 and</b></p> <p>16 <b>you watched Muhammad Ali, did you conclude</b></p> <p>17 <b>that he was suffering from brain damage?</b></p> <p>18 MR. SCIOLLA: Objection, calls for</p> <p>19 speculation.</p> <p>20 A. I don't know because I didn't watch</p> <p>21 the tape, so I don't know. Again, I can't</p> <p>22 answer that.</p> <p>23 <b>Q. Have you seen him in public where</b></p> <p>24 <b>he shakes?</b></p> <p>25 A. I've seen him with the shakes.</p>	253	<p>1 A. Yes.</p> <p>2 <b>Q. Did you talk to him in that part of</b></p> <p>3 <b>2007, prior to the murders?</b></p> <p>4 A. Locker room talk?</p> <p>5 <b>Q. Yeah.</b></p> <p>6 A. "How are you doing, what's going</p> <p>7 on."</p> <p>8 <b>Q. Right.</b></p> <p>9 A. I mean before Eddie Guerrero died,</p> <p>10 we were talking this, me, Nunzio, Chavo,</p> <p>11 Benoit and Eddie, we used to go to the gym</p> <p>12 all the time at the same time, and we all</p> <p>13 used to meet.</p> <p>14 So you're asking me if I was</p> <p>15 friendly with him, during train or after</p> <p>16 shows, yes.</p> <p>17 Have an extensive conversations</p> <p>18 with him, no.</p> <p>19 <b>Q. Do you remember the last time you</b></p> <p>20 <b>talked to him?</b></p> <p>21 A. Not at all.</p> <p>22 <b>Q. Have you ever known any 85-year-old</b></p> <p>23 <b>people with dementia?</b></p> <p>24 A. 85-year-old people with the</p> <p>25 dementia?</p>



254

1 **Q. Around 85 years old. Have you ever**  
 2 **known anybody with dementia?**  
 3 A. I know one or two people.  
 4 **Q. And how old are they?**  
 5 A. I could say the one person I know  
 6 is 50 or 60.  
 7 **Q. And how far along is their**  
 8 **dementia?**  
 9 A. I really don't keep up with him. I  
 10 know him, when I see him I'm nice to him. I  
 11 say, hello, how are you doing today. It  
 12 doesn't look very well but, you know.  
 13 **Q. Is he capable of managing his**  
 14 **affairs?**  
 15 A. Is he capable of what?  
 16 **Q. Capable of managing his own**  
 17 **affairs?**  
 18 A. No.  
 19 **Q. Would he be capable, for example,**  
 20 **of getting on a plane and flying to a strange**  
 21 **city?**  
 22 MR. SCIOLLA: Objection, calls for  
 23 speculation.  
 24 A. No.  
 25 **Q. Did the Chris Benoit that you knew**

255

1 **before you left WWE strike you as an 85 year**  
 2 **old with dementia?**  
 3 A. No.  
 4 **Q. No.**  
 5 **And nobody who knew him would have**  
 6 **thought he had dementia on a scale of an**  
 7 **85 year old dementia, would they?**  
 8 MR. SCIOLLA: Objection, calls for  
 9 speculation.  
 10 A. It wasn't even a thought.  
 11 **Q. And so if somebody had said to you**  
 12 **back in 2007 when Chris Benoit did what he**  
 13 **did, "Vito, he's like an 85-year-old with**  
 14 **dementia," what would you have said to that?**  
 15 MR. SCIOLLA: Objection, calls for  
 16 a hypothetical.  
 17 A. I would say that it's a standard no  
 18 way, I can't believe it. But that's I think  
 19 everybody's reaction.  
 20 **Q. And if you had said that, would you**  
 21 **think you would be committing some kind of**  
 22 **fraud by expressing your opinion that you**  
 23 **didn't believe that?**  
 24 MR. SCIOLLA: Objection, calls for  
 25 speculation.

256

1 A. You're talking like in general  
 2 circles about your own opinion about  
 3 different people. So I mean you know it's  
 4 not about being any kind of thing like fraud,  
 5 but it's what you think about that person.  
 6 **Q. So that, in your mind, if you**  
 7 **express your truthful opinion, based on your**  
 8 **knowledge of Chris Benoit, no way; you don't**  
 9 **think you're trying to deceive anybody.**  
 10 **You're just expressing your opinion about**  
 11 **what you knew about the man?**  
 12 MR. SCIOLLA: Object to the form.  
 13 **Q. Is that fair to say?**  
 14 A. Fair, fair statement.  
 15 **Q. Back in 2007, after Benoit, after**  
 16 **the initial discovery of the murders, do you**  
 17 **recall, there was a lot of discussion about**  
 18 **whether that was associated with steroid**  
 19 **rage?**  
 20 A. That's what they said it was part  
 21 of.  
 22 **Q. Right after the murder.**  
 23 **And did that concern you as a**  
 24 **steroid user?**  
 25 A. Well, when you are on steroids like

257

1 that, you know, you do have these bits of  
 2 rage. So I mean, it is possible.  
 3 **Q. So did that make you more**  
 4 **interested in the story as to whether or not**  
 5 **that could have been the cause?**  
 6 A. There's a difference between taking  
 7 steroids and taking testosterone replacement.  
 8 **Q. Understood.**  
 9 A. So I mean when you are taking  
 10 testosterone replacement, you are replacing  
 11 testosterone because you have a deficiency.  
 12 When you are taking steroids, you're taking  
 13 them for other gains and goals.  
 14 So when you are on a mild dose, you  
 15 know, the effect of having those rages are  
 16 very limited. You do get irritable. I'm not  
 17 saying that. But they're much greater when  
 18 you're actually taking steroids.  
 19 **Q. But is the fact that steroids were**  
 20 **put in play in this case something that made**  
 21 **you more interested in the story?**  
 22 A. No. Like I said -- like I said,  
 23 you know, like him doing that and everything  
 24 that happened, my interest of it was, okay,  
 25 it's a shock value, but after that, it really

374

1 **Q. Well, do you think it's fair to try**  
 2 **to blame somebody else for his murderous**  
 3 **acts?**  
 4 A. I didn't say that, Mr. McDevitt.  
 5 **Q. So you wouldn't have any problem if**  
 6 **WWE, in responding to media articles, were**  
 7 **suggesting that WWE in some way was**  
 8 **responsible for what Chris Benoit chose to**  
 9 **do, that they would say, this has nothing to**  
 10 **do with us or wrestling?**  
 11 MR. SCIOLLA: Object to the form.  
 12 A. I don't know. It's just something  
 13 I read. It's a statement.  
 14 **Q. In all the years that you were**  
 15 **ignorant, according to you, about what**  
 16 **concussions mean, is there any reason**  
 17 **whatsoever that you could not have read**  
 18 **articles in a public realm or watched media**  
 19 **articles that discussed at length the**  
 20 **emerging science about CTE and concussions**  
 21 **that has been going on for years?**  
 22 MR. SCIOLLA: Object, calls for  
 23 speculation.  
 24 A. No, I didn't think it pertained to  
 25 me until 2014.

375

1 **Q. Well, whether you thought it or**  
 2 **not. You could have read it in the**  
 3 **newspapers the same as anybody else, right?**  
 4 MR. SCIOLLA: Same objection.  
 5 A. I could have, but I didn't.  
 6 **Q. And whatever was in the newspapers**  
 7 **about Chris Benoit and his CTE that WWE may**  
 8 **or may not have read, you could have read the**  
 9 **same, couldn't you?**  
 10 MR. SCIOLLA: Calls for  
 11 speculation.  
 12 A. I don't know, Mr. McDevitt.  
 13 **Q. I mean they didn't have any**  
 14 **exclusive access to the public reporting on**  
 15 **anything, did they?**  
 16 MR. SCIOLLA: Objection, calls for  
 17 speculation.  
 18 A. I'm not sure. I wasn't there.  
 19 **Q. Now, you mentioned Stephanie**  
 20 **McMahon. Did you ever once tell Stephanie**  
 21 **McMahon that you think you had a head injury**  
 22 **in a match?**  
 23 A. No, I did not.  
 24 **Q. Did you ever once tell Vince**  
 25 **McMahon that you thought you had a head**

376

1 **injury in a match?**  
 2 A. No, I did not.  
 3 **Q. Did you ever once tell John**  
 4 **Laurinaitis that you thought you had a head**  
 5 **injury in a match?**  
 6 A. No, I did not.  
 7 **Q. I think you've already indicated**  
 8 **you never once told Dr. Rios that either?**  
 9 A. Yes, that is true.  
 10 **Q. And I think you also indicated,**  
 11 **your testimony, that generally speaking, Dr.**  
 12 **Rios was in the back when matches were going**  
 13 **on?**  
 14 A. Unless he was asked to be ringside  
 15 for something specific.  
 16 **Q. Understood. But I think you**  
 17 **indicated the most usual course is he is in**  
 18 **the back?**  
 19 A. In the back.  
 20 **Q. So would it be fair to say the only**  
 21 **way Dr. Rios is going to know if something**  
 22 **happened out there is if somebody tells him?**  
 23 MR. SCIOLLA: Objection, calls for  
 24 speculation.  
 25 A. The only way during a TV taping Dr.

377

1 Rios would know is if he was matching his  
 2 monitor. It's in the back. It's in the  
 3 trainers room. And if something bad  
 4 happened, he would be summoned to the ring by  
 5 the TV crew or somebody, the runner would  
 6 could come back and get him and bring him to  
 7 the ring.  
 8 **Q. And that never happened at any of**  
 9 **your matches, did it?**  
 10 A. No.  
 11 **Q. Did you like Dr. Rios?**  
 12 A. Yes.  
 13 **Q. Did you think he was a good doctor?**  
 14 A. Yes.  
 15 **Q. Do you have any indication or any**  
 16 **knowledge that any person involved in WWE**  
 17 **management ever told Dr. Rios not to tell you**  
 18 **something about head injuries or concussions?**  
 19 A. I don't know. I wasn't there. I  
 20 don't know what they told him to say or not  
 21 say. But I do know one thing --  
 22 **Q. I'm not asking what you know about**  
 23 **one thing. I'm asking you specifically.**  
 24 **Do you have any knowledge, did you**  
 25 **ever hear anybody in management at WWE tell**

378	380
<p>1 <b>Dr. Rios, look, I don't want you telling Vito</b>                  2 <b>anything about concussions?</b>                  3 A. No, I didn't.                  4 <b>Q. Do you have any evidence that</b>                  5 <b>anybody at WWE ever directed anybody in the</b>                  6 <b>medical staff to withhold any information</b>                  7 <b>from you?</b>                  8 A. From me personally, no.                  9 <b>Q. Do you have any knowledge that</b>                  10 <b>anybody at WWE management or employees ever</b>                  11 <b>told Dr. Rios or the medical staff to lie to</b>                  12 <b>you about anything?</b>                  13 A. Not that I'm aware of.                  14 MR. McDEVITT: Again, I don't think                  15 I have anything more, Mr. LoGrasso, and                  16 I thank you for your time.                  17 MR. SCIOLLA: All done.                  18 THE VIDEOGRAPHER: This concludes                  19 the video deposition. The time 6:14                  20 p.m., off the record.                  21 MR. McDEVITT: On the record.                  22 What do you plan on doing about                  23 what I asked you about, what you said in                  24 the reconsideration motion to the court                  25 that we now know is false.</p>	<p>1 STATE OF _____ )                  2 ) :ss                  3 COUNTY OF _____ )                  4                  5                  6 I, VITO LOGRASSO, the witness                  7 herein, having read the foregoing                  8 testimony of the pages of this                  9 deposition, do hereby certify it to be a                  10 true and correct transcript, subject to                  11 the corrections, if any, shown on the                  12 attached page.                  13                  14 _____                  15 VITO LOGRASSO                  16                  17 Sworn and subscribed to before                  18 me, this _____ day of                  19 _____, 2015.                  20 _____                  21 Notary Public                  22                  23                  24                  25</p>
379	381
<p>1 MR. SCIOLLA: I'm not prepared to                  2 give you an answer right now.                  3 MR. McDEVITT: Well, as you all                  4 know, we are supposed to talk to the                  5 court at 4 o'clock tomorrow. I would                  6 appreciate some answer before the                  7 conference call, because I will bring it                  8 up if you don't tell me.                  9 MR. SCIOLLA: For sure.                  10 MR. McDEVITT: I would appreciate                  11 it if you would consult with whoever you                  12 are going to consult with, and let me                  13 know the answer.                  14 MR. SCIOLLA: Agreed.                  15 MR. McDEVITT: Off the record.                  16 (Time noted: 6:14 p.m.)                  17                  18                  19                  20                  21                  22                  23                  24                  25</p>	<p>1 C E R T I F I C A T E                  2 COMMONWEALTH OF PENNSYLVANIA )                  3 : ss.                  4 COUNTY OF PHILADELPHIA )                  5                  6 I, Jennifer Ocampo-Guzman, a                  7 Notary Public within and for the Commonwealth                  8 of Pennsylvania, do hereby certify:                  9 That VITO LOGRASSO, the witness                  10 whose deposition is hereinbefore set forth,                  11 was duly sworn and that such deposition is a                  12 true record of the testimony given by the                  13 witness.                  14 I further certify that I am not                  15 related to any of the parties to this action                  16 by blood or marriage, and that I am in no                  17 way interested in the outcome of this                  18 matter.                  19 IN WITNESS WHEREOF, I have                  20 hereunto set my hand this 19th day of May                  21 2016.                  22 _____                  23 JENNIFER OCAMPO-GUZMAN, CRR, CLR                  24                  25</p>