

Exhibit 3

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

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| 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> | 5 |

1 A P P E A R A N C E S (cont'd.) :

2

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15 JOSEPH WILLS, Videographer

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| 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> |

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| 18 | <p>1 Q. Did you attend any presentations given by</p> <p>2 Dr. Maroon when you were in Florida?</p> <p>3 A. Not that I remember, no.</p> <p>4 Q. Not that you remember. Did you happen to</p> <p>5 watch a tape that's been produced in this litigation</p> <p>6 of a presentation he gave?</p> <p>7 MR. POGUST: Objection.</p> <p>8 A. Not that I remember, no.</p> <p>9 Q. You didn't watch the tape?</p> <p>10 A. Not that I remember, no.</p> <p>11 Q. In the course of preparing for this</p> <p>12 deposition, nobody showed you a tape of a</p> <p>13 presentation?</p> <p>14 A. No.</p> <p>15 Q. In the last couple of weeks, nobody's</p> <p>16 shown you a tape of a presentation that Dr. Maroon</p> <p>17 gave to all talent down in Florida?</p> <p>18 MR. POGUST: Objection.</p> <p>19 A. No.</p> <p>20 Q. Were you in Florida in August of 2012?</p> <p>21 A. Yes.</p> <p>22 Q. So you don't deny or admit that you were</p> <p>23 at that presentation, you claim you don't remember</p> <p>24 either way?</p> <p>25 A. I don't remember.</p> | 20 |
| 19 | <p>1 Q. Do you remember him speaking to you about</p> <p>2 concussions?</p> <p>3 A. No.</p> <p>4 Q. Have you ever read any congressional</p> <p>5 testimony by anybody?</p> <p>6 A. I'm sorry, I don't -- congressional</p> <p>7 testimony.</p> <p>8 Q. Of any kind.</p> <p>9 A. What is that?</p> <p>10 Q. Did you ever read any testimony that</p> <p>11 anybody gave before a committee of Congress?</p> <p>12 A. I don't know.</p> <p>13 Q. Well, you'd know, did you do it or didn't</p> <p>14 you?</p> <p>15 MR. POGUST: Objection.</p> <p>16 A. No.</p> <p>17 Q. Did you ever read any testimony of</p> <p>18 Stephanie McMahon?</p> <p>19 A. No.</p> <p>20 Q. Did you ever watch any television</p> <p>21 programs where Vince and Linda McMahon -- well, first</p> <p>22 of all, let me ask you: Do you know who Vince and</p> <p>23 Linda McMahon are?</p> <p>24 A. Yes.</p> <p>25 Q. Who are they?</p> | 21 |
| 18 | <p>1 A. They're the owners of WWE.</p> <p>2 Q. Did you ever watch any television</p> <p>3 programs where Mr. and Mrs. McMahon were being</p> <p>4 interviewed regarding the Chris Benoit situation?</p> <p>5 A. No.</p> <p>6 Q. Never?</p> <p>7 MR. POGUST: You have to answer --</p> <p>8 Q. You have to respond verbally.</p> <p>9 A. No.</p> <p>10 Q. Did you ever watch any television</p> <p>11 programs about the Chris Benoit murder?</p> <p>12 A. Yes.</p> <p>13 Q. What programs did you watch?</p> <p>14 A. Local news.</p> <p>15 Q. Local news?</p> <p>16 A. Yeah.</p> <p>17 Q. And what did you learn by watching those?</p> <p>18 A. I got from the news article that I saw</p> <p>19 that it was about steroid and anti-depressant abuse.</p> <p>20 Q. And when did you read that?</p> <p>21 MR. POGUST: Objection.</p> <p>22 A. I don't remember.</p> <p>23 Q. Did you follow the story as it developed?</p> <p>24 A. No.</p> <p>25 Q. So did you follow the story as it was</p> | 21 |
| 19 | <p>1 reported that he had brain damage?</p> <p>2 A. No.</p> <p>3 Q. You missed that somehow?</p> <p>4 A. (Nods.)</p> <p>5 Q. Is that a yes?</p> <p>6 A. Yes.</p> <p>7 Q. So you missed all the news coverage of</p> <p>8 that, of that story?</p> <p>9 A. Yes.</p> <p>10 Q. Even though you'd been a wrestling fan</p> <p>11 all your life?</p> <p>12 A. Yes.</p> <p>13 Q. When did you first learn that Chris</p> <p>14 Benoit supposedly had brain damage?</p> <p>15 A. I didn't. I didn't, I don't know. I</p> <p>16 didn't know that.</p> <p>17 Q. So this is the first time you've heard of</p> <p>18 that?</p> <p>19 A. Yeah.</p> <p>20 Q. Today?</p> <p>21 A. Yeah.</p> <p>22 Q. Up until the moment you walked in this</p> <p>23 room, you never heard that Chris Benoit had brain</p> <p>24 damage?</p> <p>25 A. Yes.</p> | 21 |