Case 3:15-cv-01074-VLB Document 158-3 Filed 05/27/16 Page 1 of 5

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

Case 3:15-cv-01074-VLB Document 158-3 Filed 05/27/16 Page 3 of 5

2 4 1 May 11, 2016 1 A P P E A R A N C E S (cont'd.): 2 Philadelphia, Pennsylvania 2 4 4 ATTORNEYS FOR DEFENDANT: 4 K&L GATES LLP 5 T R A N S C R IP T of the Videotaped 6 6 Deposition of EVAN M. SINGLETON, pursuant to the 6 7 Federal Rules of Civil Procedure, held at the offices 7 9 Street, Philadelphia, Pennsylvania, on Wednesday, May 9 9 Street, Philadelphia, Pennsylvania, on Wednesday, May 9 10 11, 2016, commencing at approximately 9:29 a.m., 10 StrEf ANIE M. LACY, ESQ. 11 Street, Philadelphia, Pennsylvania, on Wednesday, May 9 12 Professional Reporter, Certified Court Reporter and 12 13 Notary Public. 13 14 A L S O P R E S E N T: JOSEPH WILLS, Videographer 16 16 17 18 19 19 20 20 21 21 22 22 23 23 24 24 25 25 3
2 Philadelphia, Pennsylvania 2 ATTORNEYS FOR DEFENDANT: 3 9.29 a.m. 3 ATTORNEYS FOR DEFENDANT: 4 TR A N S C R I P T of the Videotaped 5 210 Sixth Avenue 6 Deposition of EVAN M. SINGLETON, pursuant to the federal Rules of Civil Procedure, held at the offices 6 210 Sixth Avenue 8 of Kleinbard LLC, One Liberty Place, 1650 Market 8 BY: JERRY S. McDEVITT, ESQ. 9 Street, Philadelphia, Pennsylvania, on Wednesday, May 9 jerry.mcdevitt@klgates.com 11 Jolic, commencing at approximately 9:29 a.m., 10 StreFANIE M. LACY, ESQ. stefanie.lacy@klgates.com 11 Professional Reporter, Certified Court Reporter and 12 13 Notary Public. 14 14 A L S O P R E S E N T: JOSEPH WILLS, Videographer 16 16 17 17 18 19 19 20 20 20 20 21 21 22 23 24 22 23 24 24 23 A TORNEYS FOR PLAINTIFFS: 3 EVAN M.SINGLETON 4 P P E A R A N C E S :
2 Philadelphia, Pennsylvania 2 3 9:29 a.m. 3 ATTORNEYS FOR DEFENDANT: 4 K&I. GATES ILP 210 Sixth Avenue 5 TRANSCRIPT of the Videotaped 5 210 Sixth Avenue 6 Deposition of EVAN N SINGLETON, pursuant to the 6 Pittsburgh, Pennsylvania 15222 7 Federal Rules of Civil Procedure, held at the offices 7 412.355.6500 8 of Kleinbard LLC, One Liberty Place, 1650 Market 8 BY: JERRY S. McDEVITT, ESQ. 9 Streter, Philadelphia, Pennsylvania 9 Streter, Philadelphia, Pennsylvania, 10 STEFANIE M. LACY, ESQ. 10 11, 2016, commencing at approximately 9:29 a.m., 10 STEFANIE M. LACY, ESQ. 11 before Josephine H. Fasset, a Registered 11 12 12 Professional Reporter, Certified Court Reporter and 12 12 13 Notary Public. 13 A A L S O P R E S E N T: 14 A L S O P R E S E N T: JOSEPH WILLS, Videographer 16 16 16 16 17 Professional Reporter, Certified Court Report and 20 <
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20 BY: KONSTANTINE W. KYROS, ESQ. 20 2/17/2015
21 kon@kyroslaw.com 21 Exhibit 6 Neurological Examination dated 61
22 22 3/23/2015
23 Exhibit 7 Emergency Room Visit 11/15/2014 75
24 Report

2 (Pages 2 to 5)

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

3 (Pages 6 to 9)

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

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