

Exhibit 8

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>

142	<p>1 FCW/NXT in Florida, did they have athletic trainers</p> <p>2 there?</p> <p>3 A. Athletic trainers being like what?</p> <p>4 Q. Athletic trainers.</p> <p>5 A. What's an athletic trainer?</p> <p>6 MR. POGUST: If you don't understand --</p> <p>7 A. I don't understand the question.</p> <p>8 Q. People that attend to medical ailments</p> <p>9 and --</p> <p>10 A. Oh, okay, okay. Yes.</p> <p>11 Q. And who were they?</p> <p>12 A. I remember they had one trainer, his name</p> <p>13 was Brian, I don't remember his last name.</p> <p>14 Q. And did you deal with him much?</p> <p>15 A. Not really.</p> <p>16 Q. All right. Aside from the September 27th</p> <p>17 head injury that you reported to WWE, did you report</p> <p>18 any other head injury to WWE doctors or trainers</p> <p>19 while you were performing?</p> <p>20 A. I don't know.</p> <p>21 Q. Well, as you sit here today, can you</p> <p>22 identify any other time that you told them that you</p> <p>23 had a head injury?</p> <p>24 A. No.</p> <p>25 Q. As you sit there today, aside from the</p>	144	<p>1 BY MR. McDEVITT:</p> <p>2 Q. Mr. Singleton, I've handed you what's</p> <p>3 been marked as Exhibit 10.</p> <p>4 Do you recognize the second, third and</p> <p>5 fourth pages here as something you submitted to the</p> <p>6 WWE in connection with trying to get a position with</p> <p>7 WWE?</p> <p>8 A. Yes.</p> <p>9 Q. And did you fill this out?</p> <p>10 A. I remember mine written down, but.</p> <p>11 Q. All right. And if you go to page 2997 at</p> <p>12 the bottom there, am I correct it indicates your</p> <p>13 interest in hobbies was watching wrestling matches?</p> <p>14 A. Where's that at? Okay. Yes.</p> <p>15 Q. At the very bottom of this when it says</p> <p>16 do you have any hidden talents or passions, what did</p> <p>17 you write?</p> <p>18 A. I am a talented artist and have a great</p> <p>19 memory .</p> <p>20 Q. Does that refresh your recollection that</p> <p>21 you claim to have a great memory?</p> <p>22 A. No.</p> <p>23 Q. And then at the top of the page, it says:</p> <p>24 Why did you get into wrestling? And what did you</p> <p>25 answer?</p>
143	<p>1 September 27th episode that we're here about, do you</p> <p>2 recall any instance where you had a head injury?</p> <p>3 A. No.</p> <p>4 Q. And is the, to your knowledge, the injury</p> <p>5 you sustained on the 27th to your head, is that the</p> <p>6 only time in your life you have ever had a</p> <p>7 concussion?</p> <p>8 A. Yes.</p> <p>9 Q. Have you ever been in a street fight?</p> <p>10 A. No.</p> <p>11 Q. So you've never gotten punched in the</p> <p>12 head in a real fight?</p> <p>13 A. No.</p> <p>14 Q. And you, I think indicated, you never had</p> <p>15 a concussion playing football?</p> <p>16 A. No.</p> <p>17 Q. Did you ever land on your head doing</p> <p>18 amateur wrestling?</p> <p>19 A. No.</p> <p>20 Q. Never had a concussion there either?</p> <p>21 A. No.</p> <p>22 (Evan Singleton Talent Questionnaire</p> <p>23 marked as Singleton Exhibit 10, as of this</p> <p>24 date.)</p> <p>25</p>	145	<p>1 MR. POGUST: The next page?</p> <p>2 MR. McDEVITT: Yes.</p> <p>3 A. You want me to read it?</p> <p>4 Q. Yes.</p> <p>5 A. I always wanted to be a wrestler since my</p> <p>6 dad and I watched WCW when I was growing up. The</p> <p>7 rest is history. I just love everything about the</p> <p>8 business.</p> <p>9 Q. What was it about the business that you</p> <p>10 love?</p> <p>11 A. The entertainment factor.</p> <p>12 Q. What did you find about it to be so</p> <p>13 entertaining?</p> <p>14 A. The storylines. The storylines really</p> <p>15 had a way of just entrancing me when I was at that</p> <p>16 age.</p> <p>17 Q. Any particular storylines that you</p> <p>18 remember?</p> <p>19 A. No, nothing specific, just big picture.</p> <p>20 (World Wrestling Entertainment, Inc.</p> <p>21 Booking Contract marked as Singleton Exhibit</p> <p>22 11, as of this date.)</p> <p>23 BY MR. McDEVITT:</p> <p>24 Q. I've just handed you what's been marked</p> <p>25 as Exhibit 11. Do you recognize that document,</p>

174	<p>1 THE WITNESS: Oh, that's on 28. Oh. I</p> <p>2 was on page 27.</p> <p>3 MR. POGUST: Yeah, yeah, start here.</p> <p>4 BY MR. McDEVITT:</p> <p>5 Q. Do you see Paragraph 123 there?</p> <p>6 A. Yep.</p> <p>7 Q. Am I correct that I have read that last</p> <p>8 sentence of Paragraph 123 correctly?</p> <p>9 A. Yes.</p> <p>10 Q. And you make the allegation there that</p> <p>11 WWE discouraged you from seeking additional</p> <p>12 appropriate medical help, for example, from a</p> <p>13 neurologist. The reality is, they sent you to a</p> <p>14 neurologist, didn't they?</p> <p>15 A. Yes.</p> <p>16 Q. Many of them?</p> <p>17 A. Yes.</p> <p>18 Q. So why did you allege that they</p> <p>19 discouraged you from seeing neurologists when, in</p> <p>20 fact, you knew they had sent you to see neurologists?</p> <p>21 A. They were all neurologists that were</p> <p>22 given to me. I didn't have the option of picking my</p> <p>23 own neurologist.</p> <p>24 Q. That's not what you allege, though. You</p> <p>25 allege that they discouraged you from seeking</p>	176	<p>1 opinion of my choice.</p> <p>2 Q. And what did you want to ask them?</p> <p>3 A. I wanted to ask them their opinion.</p> <p>4 Q. But did -- did you ask Dr. Greenberg his</p> <p>5 opinion?</p> <p>6 A. I don't remember.</p> <p>7 Q. Well, and you say you couldn't get your</p> <p>8 own neurologist, why couldn't you get your own</p> <p>9 neurologist?</p> <p>10 A. It was required of me to go to the ones</p> <p>11 they were appointing to me.</p> <p>12 Q. But you were perfectly capable of calling</p> <p>13 any neurologist and saying "I want a second opinion,"</p> <p>14 weren't you?</p> <p>15 A. I don't know.</p> <p>16 Q. Did you do that?</p> <p>17 A. No.</p> <p>18 Q. But the WWE didn't discourage you from</p> <p>19 seeing a neurologist, did they, they sent you to</p> <p>20 neurologists?</p> <p>21 A. Yes.</p> <p>22 Q. Paragraph 124 of this document says:</p> <p>23 After approximately 15 matches during which he</p> <p>24 sustained multiple traumas he suffered a serious head</p> <p>25 injury during a match with Erick Rowan. The WWE</p>
175	<p>1 appropriate medical help.</p> <p>2 A. Yeah.</p> <p>3 Q. Did you ever tell them you wanted to see</p> <p>4 an independent neurologist?</p> <p>5 A. Yeah.</p> <p>6 Q. Did you have some reason to think</p> <p>7 Dr. Greenberg wasn't?</p> <p>8 A. No.</p> <p>9 Q. Who did you tell you wanted to see an</p> <p>10 independent neurologist?</p> <p>11 A. Stacy DePolo.</p> <p>12 Q. And when did you tell her that?</p> <p>13 A. I don't know.</p> <p>14 Q. Did you communicate that to her in</p> <p>15 writing?</p> <p>16 A. No.</p> <p>17 Q. Did you do that before or after you saw</p> <p>18 Dr. Greenberg?</p> <p>19 A. I don't remember.</p> <p>20 Q. Do you have some reason to think</p> <p>21 Dr. Greenberg was a hack and incompetent?</p> <p>22 A. I don't, I don't know.</p> <p>23 Q. Well, why did you want to see an</p> <p>24 independent neurologist?</p> <p>25 A. I wanted to ask someone their personal</p>	177	<p>1 cleared him to continue wrestling after inadequate</p> <p>2 rest time and downplayed his injury. Do you see</p> <p>3 that?</p> <p>4 A. Yes.</p> <p>5 Q. The WWE never cleared you to wrestle</p> <p>6 again, did they?</p> <p>7 A. I don't remember.</p> <p>8 Q. Well, you just testified you never</p> <p>9 wrestled again.</p> <p>10 A. I didn't.</p> <p>11 Q. And so how did they clear you to continue</p> <p>12 wrestling when you never wrestled again?</p> <p>13 A. I don't remember.</p> <p>14 Q. Well, who do you contend cleared you to</p> <p>15 wrestle?</p> <p>16 A. I don't know.</p> <p>17 Q. Well, you made this allegation that WWE</p> <p>18 cleared him to continue wrestling. Who -- who</p> <p>19 cleared you to continue wrestling?</p> <p>20 A. I don't know.</p> <p>21 Q. What was the basis of that statement</p> <p>22 then?</p> <p>23 A. I don't know.</p> <p>24 Q. Did you provide that to your lawyers?</p> <p>25 A. I don't remember.</p>