

# Exhibit 13

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<br/>2<br/>3<br/>4<br/>5<br/>6<br/>7<br/>8<br/>9<br/>10<br/>11<br/>12<br/>13<br/>14<br/>15<br/>16<br/>17<br/>18<br/>19<br/>20<br/>21<br/>22<br/>23<br/>24<br/>25</p> <p style="text-align: center;">May 18, 2016<br/>9:35 a.m.</p> <p style="text-align: center;">Videotaped Deposition of VITO<br/>LOGRASSO, held at the offices of<br/>Kleinbard, LLC, 1650 Market Street,<br/>Philadelphia, Pennsylvania, pursuant to<br/>notice, before Jennifer Ocampo-Guzman,<br/>a Certified Real-Time Shorthand<br/>Reporter and Notary Public of the<br/>Commonwealth of Pennsylvania.</p>  | <p>1<br/>2<br/>3<br/>4<br/>5<br/>6<br/>7<br/>8<br/>9<br/>10<br/>11<br/>12<br/>13<br/>14<br/>15<br/>16<br/>17<br/>18<br/>19<br/>20<br/>21<br/>22<br/>23<br/>24<br/>25</p> <p>APPEARANCES (Cont.d):</p> <p style="text-align: center;">Attorneys for Defendant<br/>K&amp;L GATES, LLP<br/>210 Sixth Avenue<br/>Pittsburgh, Pennsylvania 15222<br/>BY: JERRY McDEVITT, ESQ.<br/>jerry.mcdevitt@klgates.com<br/>STEFANIE M. LACY, ESQ.<br/>stefanie.lacy@klgates.com</p> <p>ALSO PRESENT:<br/>JOSEPH WILLS, Videographer</p>   |
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| <p>1<br/>2<br/>3<br/>4<br/>5<br/>6<br/>7<br/>8<br/>9<br/>10<br/>11<br/>12<br/>13<br/>14<br/>15<br/>16<br/>17<br/>18<br/>19<br/>20<br/>21<br/>22<br/>23<br/>24<br/>25</p> <p>APPEARANCES:</p> <p style="text-align: center;">Attorneys for Plaintiff Vito LoGrasso<br/>POGUST BRASLOW MILLROOD, LLC<br/>Eight Tower Bridge<br/>161 Washington St., Suite 1520<br/>Conshohocken, Pennsylvania 19428<br/>BY: ANDREW J. SCIOLLA, ESQ.<br/>asciolla@pbmattorneys.com</p> <p style="text-align: center;">Attorneys for Plaintiff Vito LoGrasso<br/>KYROS LAW OFFICES<br/>17 Miles Road<br/>Hingham, Massachusetts 02043<br/>BY: KONSTANTINE W. KYROS, ESQ.<br/>kon@kyroslaw.com<br/>ANTHONY NORRIS, ESQ.</p> | <p>1<br/>2<br/>3<br/>4<br/>5<br/>6<br/>7<br/>8<br/>9<br/>10<br/>11<br/>12<br/>13<br/>14<br/>15<br/>16<br/>17<br/>18<br/>19<br/>20<br/>21<br/>22<br/>23<br/>24<br/>25</p> <p>THE VIDEOGRAPHER: We are now on<br/>the record.</p> <p>My name is Joseph Wills, the<br/>videographer obtained by David Feldman<br/>Worldwide. This is a video deposition<br/>for the United States District Court for<br/>the District of Connecticut. Today's<br/>date is May 18, 2016, and the video time<br/>is 9:35 a.m.</p> <p>This deposition is being held at<br/>1650 Market Street, Philadelphia,<br/>Pennsylvania, in the matters of<br/>McCullough, et al., versus World<br/>Wrestling Entertainment Incorporated and<br/>Singleton and LoGrasso versus World<br/>Wrestling Entertainment Incorporated.<br/>The deponent is Vito LoGrasso.</p> <p>Will all counsel please identify<br/>themselves.</p> <p>MR. SCIOLLA: Andrew Sciolla from<br/>Pogust Braslow Millrood, on behalf the<br/>plaintiff, Vito LoGrasso.</p> <p>MR. KYROS: Konstantine Kyros,<br/>Kyros Law Offices, for the plaintiff,<br/>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 VITO J. LOGRASSO, 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

A. Yes, sir.  
 REDACTED

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.  
 REDACTED

9

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**

234

1 se.

2 **Q. And what was your understanding of**

3 **what happened to Chris Nowinski?**

4 A. I'm not sure.

5 **Q. Did you ever hear he got**

6 **concussions?**

7 A. Not that I was aware of.

8 **Q. You never heard Chris Nowinski got**

9 **concussions?**

10 A. I know he runs this foundation.

11 **Q. And when did you learn that, when**

12 **did you learn that?**

13 A. A concussion foundation.

14 **Q. When did you learn that?**

15 A. I'm not sure.

16 **Q. But your testimony is that you**

17 **never heard in the locker rooms or anywhere**

18 **that Chris Nowinski had to retire from the**

19 **WWE wrestling because of concussions that he**

20 **received?**

21 A. I didn't know he had to retire

22 because of a concussion.

23 **Q. Did you know that he got**

24 **concussions?**

25 A. I don't recall if he got a

235

1 concussion.

2 **Q. Did you know that he went into the**

3 **area of concussion research?**

4 A. I know he was into the research.

5 **Q. Did you know that in 2005, 2006?**

6 A. No.

7 **Q. Did you know he wrote a book?**

8 A. No.

9 **Q. So your testimony is you had no**

10 **knowledge whatsoever of this wrestler who**

11 **went into concussion research that led to all**

12 **these scientific discoveries of what we're**

13 **here to talk about?**

14 A. I'm sorry, I don't read books.

15 **Q. Did you know Chris Benoit?**

16 A. Yes.

17 **Q. Was he a friend of yours?**

18 A. I guess you could say he was a

19 friend. We worked together.

20 **Q. And you're aware what happened**

21 **shortly after you left -- by the way, did you**

22 **know his wife?**

23 A. Nancy, right?

24 **Q. Yes.**

25 A. Uh-huh.

236

1 **Q. Did you know her, too?**

2 A. Yeah, I knew her. Yeah.

3 **Q. And did you know Dr. Aston?**

4 A. Dr. Aston I don't think I met.

5 **Q. Did you know that's the person who**

6 **was supplying him drugs down in Georgia?**

7 A. No. Person life like that, I don't

8 know.

9 **Q. So you were aware of Chris Benoit**

10 **murdering his wife and his son and then**

11 **committing suicide in 2007, weren't you?**

12 A. Yes, sir.

13 **Q. And would you agree with me that**

14 **was a huge story --**

15 A. Yes, sir.

16 **Q. -- just about everywhere when it**

17 **happened, wasn't it? National news, USA**

18 **Today, People magazine, well-known in**

19 **wrestling business, wasn't it?**

20 A. Yeah, it was well known. I mean --

21 **Q. And you followed that story, didn't**

22 **you?**

23 A. All I know is that she, they said

24 he had CTE, he had brain damage. They said

25 it could have been a steroid range -- rage,

237

1 excuse me.

2 WWE had said that it had nothing to

3 do with wrestling.

4 **Q. Where did WWE say that?**

5 A. I don't recall.

6 **Q. Then why did you say that, if you**

7 **don't recall?**

8 A. Because that's what I remember. If

9 you're asking me. I remember that you guys

10 took him off, you guys took him off all of

11 your programming, and he was abolished, and

12 he's a memory in the WWE.

13 **Q. What does that have to do with the**

14 **WWE supposedly saying that it nothing to do**

15 **with wrestling?**

16 A. Because I believe that's what you

17 guys had said.

18 **Q. Where?**

19 A. I don't remember where, but it had

20 nothing to do with wrestling. You know, he

21 was just -- he went out of his mind. He

22 could have had CTE, it could have been a

23 steroid rage.

24 **Q. So when did you hear that he could**

25 **have had CTE?**

|     |  |     |   |
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| 238 | <p>1 A. Well, at the same time he was</p> <p>2 having all of these problems when the story</p> <p>3 came out.</p> <p>4 <b>Q. And that was 2007, right?</b></p> <p>5 A. I think it was after 2007. I'm not</p> <p>6 sure.</p> <p>7 <b>Q. Well, do you recall there being a</b></p> <p>8 <b>big press conference that announced he had</b></p> <p>9 <b>CLE (sic)? It was all over the news.</b></p> <p>10 MR. SCIOLLA: CLE?</p> <p>11 MS. LACY: CTE.</p> <p>12 MR. SCIOLLA: It's not legal</p> <p>13 classes.</p> <p>14 <b>Q. CTE. Do you remember there being a</b></p> <p>15 <b>news conference announcing this and making a</b></p> <p>16 <b>whole lot of publicity about the fact that</b></p> <p>17 <b>this wrestler who had murdered his wife and</b></p> <p>18 <b>his child had this supposed CTE?</b></p> <p>19 A. I mean I feel story that he did</p> <p>20 that, and I knew Nancy and I knew him and I</p> <p>21 knew the son, and I feel bad.</p> <p>22 <b>Q. I'm sure we all do, Mr. LoGrasso,</b></p> <p>23 <b>but my question is: Did you hear about the</b></p> <p>24 <b>press conference where there was this</b></p> <p>25 <b>announcement that he had CTE?</b></p> | 240 | <p>1 He could have went into a steroid rage,</p> <p>2 because he was on the gas. He could have, it</p> <p>3 could have been, who knows? You know, I was</p> <p>4 there, nobody knows for sure what the hell</p> <p>5 happened. All I know is that it happened,</p> <p>6 and it was a shock to the wrestling world.</p> <p>7 <b>Q. And a lot of people were wondering</b></p> <p>8 <b>about the CTE aspect, weren't they?</b></p> <p>9 MR. SCIOLLA: Objection, calls for</p> <p>10 speculation.</p> <p>11 A. I guess so. I'm not sure.</p> <p>12 <b>Q. Well, what was his finishing move?</b></p> <p>13 A. Flying head butt off the top of, if</p> <p>14 I remember. Cripple cross fist.</p> <p>15 <b>Q. But in terms of flying head butt,</b></p> <p>16 <b>wasn't that a lot of discussion about whether</b></p> <p>17 <b>that particular move is what contributed to</b></p> <p>18 <b>his alleged head trauma and CTE?</b></p> <p>19 MR. SCIOLLA: Objection, calls for</p> <p>20 speculation.</p> <p>21 <b>Q. Do you recall --</b></p> <p>22 A. It could have been something that</p> <p>23 he did every night.</p> <p>24 <b>Q. And you recall that being part of</b></p> <p>25 <b>the discussion as to whether that was part of</b></p> |
| 239 | <p>1 A. No, I did not.</p> <p>2 <b>Q. But you knew it was said publicly</b></p> <p>3 <b>in or around the time of that murder that he</b></p> <p>4 <b>had CTE?</b></p> <p>5 A. Right.</p> <p>6 <b>Q. And that was, frankly, a big story</b></p> <p>7 <b>in the wrestling business, wasn't it?</b></p> <p>8 MR. SCIOLLA: Objection, asked and</p> <p>9 answered.</p> <p>10 A. It was.</p> <p>11 <b>Q. And there probably wasn't anybody</b></p> <p>12 <b>that ever wrestled in that time frame that</b></p> <p>13 <b>did not know Chris Benoit had been supposedly</b></p> <p>14 <b>diagnosed with CTE?</b></p> <p>15 MR. SCIOLLA: Objection, calls for</p> <p>16 speculation.</p> <p>17 <b>Q. Would you agree with that?</b></p> <p>18 A. It was a big story, like you said.</p> <p>19 <b>Q. And people were talking about it in</b></p> <p>20 <b>locker rooms, because they were concerned</b></p> <p>21 <b>about what does that mean about me; is that</b></p> <p>22 <b>fair to say?</b></p> <p>23 MR. SCIOLLA: Object to form.</p> <p>24 A. There was a lot of talk at that</p> <p>25 time. Like, you know, nobody knew for sure.</p>  | 241 | <p>1 <b>what caused it?</b></p> <p>2 A. No, I don't recall.</p> <p>3 <b>Q. Do you know how many newspaper</b></p> <p>4 <b>articles and media stories were out there</b></p> <p>5 <b>about Chris Benoit and CTE?</b></p> <p>6 A. No, I don't, sir.</p> <p>7 <b>Q. But you would agree a lot, right?</b></p> <p>8 MR. SCIOLLA: Objection.</p> <p>9 A. I would assume so. It was a pretty</p> <p>10 big story.</p> <p>11 <b>Q. Well, when you heard that story,</b></p> <p>12 <b>did you go to your doctor, your personal</b></p> <p>13 <b>doctor and say, do I have anything to worry</b></p> <p>14 <b>about?</b></p> <p>15 A. No, because it wasn't until 2014</p> <p>16 that I started to get myself checked out and</p> <p>17 realized that something could possibly be</p> <p>18 wrong.</p> <p>19 So whatever Chris Benoit did or how</p> <p>20 or that stuff didn't pertain to me at the</p> <p>21 time, because I didn't think it was me. But</p> <p>22 it wasn't until I started going to these</p> <p>23 doctors, and they started telling me that I</p> <p>24 had these symptoms, that I thought that it</p> <p>25 could be me. And that's when I started to do</p>  |