

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

RUSS McCULLOUGH, <i>et al.</i>,	:	No. 3:15-cv-01074 (VLB)
	:	Lead Case
Plaintiffs,	:	
	:	
vs.	:	
	:	
WORLD WRESTLING ENTERTAINMENT, INC.,	:	
	:	
Defendant.	:	

EVAN SINGLETON and VITO LOGRASSO,	:	No. 3:15-cv-00425 (VLB)
	:	Consolidated Case
Plaintiffs,	:	
	:	
vs.	:	
	:	
WORLD WRESTLING ENTERTAINMENT, INC.,	:	
	:	
Defendant.	:	

APPENDIX TO
DEFENDANT WORLD WRESTLING ENTERTAINMENT, INC.'S
LOCAL RULE 56(a)(1) STATEMENT

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2.	Plaintiff Evan Singleton's Objections and Responses to Defendant World Wrestling Entertainment, Inc.'s First Set of Requests for Admission, dated April 14, 2016
3.	Exhibits to Defendant World Wrestling Entertainment, Inc.'s First Set of Requests for Admission, dated February 8, 2016 (CDs containing exhibits 18, 31, 94 filed manually)
4.	Transcript of Deposition of Vito LoGrasso, taken May 18, 2016
5.	May 6, 2009 Email from Vito LoGrasso to John Laurinaitis, Ty Bailey, Steve Keirn, produced by Defendant at WWE_SING00002132-133, marked as LoGrasso Depo. Ex. 3 [Designated Confidential pursuant to the Standing Protective Order]
6.	Vito LoGrasso Booking Contract, dated June 28, 2005, marked as LoGrasso Depo. Ex. 19, produced by Defendant at WWE_SING00000307-332 [Designated Confidential pursuant to the Standing Protective Order]
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8.	May 16, 2007 letter from Joe Bogdan to Vito LoGrasso, produced by Defendant at WWE_SING00000305-306 [Designated Confidential pursuant to the Standing Protective Order]
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10.	Excerpted testimony from the deposition of Stephanie McMahon, taken May 26, 2016 [Designated Confidential pursuant to the Standing Protective Order]
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14.	Treatment notes of Vito LoGrasso, marked as LoGrasso Depo. Ex. 21, produced by Defendant at WWE_SING00000517-520 [Designated Confidential pursuant to the Standing Protective Order]
15.	Slow motion footage from October 10, 2006 match, marked as LoGrasso Depo. Ex. 20 (DVD filed manually)
16.	Video footage of August 29, 2006 match, marked as LoGrasso Depo. Ex. 17 (DVD filed manually)
17.	Letter from Vincent McMahon to Vito LoGrasso, dated January 20, 2011, produced by Defendant at WWE_SING00000507
18.	Letter from Vincent McMahon to Vito LoGrasso, dated February 19, 2010, produced by Defendant at WWE_SING00000508
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20.	Letter from Vincent McMahon to Vito LoGrasso, dated March 24, 2009, produced by Defendant at WWE_SING00000511

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21.	<p>Excerpted testimony from the deposition of William DeMott, Jr., taken May 17, 2016</p> <p>[Designated Confidential pursuant to the Standing Protective Order]</p>
22.	<p>Medical report of Vito LoGrasso appointment with Dr. Joseph Handler, dated March 2, 2015, produced by Dr. Handler in response to subpoena</p> <p>[Designated Confidential pursuant to the Standing Protective Order]</p>
23.	<p>Article titled "Big Vito talks about wanting to work with Jeff Jarrett, and much more" from onlineworldofwrestling.com, dated February 28, 2014, marked as LoGrasso Depo. Ex. 7</p>
24.	<p>AngryMarks Podcast Network - The Undisputed Wrestling Show - Episode 6 with Big Vito LoGrasso & CZW's Lucky 13, dated February 11, 2014, marked as LoGrasso Depo. Ex. 8</p> <p>(DVD filed manually)</p>
25.	<p>History and Physical medical report of Vito LoGrasso appointment with Dr. Mariotti, dated May 17, 2012, produced by Dr. Smith in response to subpoena</p> <p>[Designated Confidential pursuant to the Standing Protective Order]</p>
26.	<p>Standard Commission History and Physical Examination Record for License as a Wrestler, dated July 12, 2005, produced by Defendant at WWE_SING00003014-15</p> <p>[Designated Confidential pursuant to the Standing Protective Order]</p>
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31.	MRI report, dated April 28, 2015, produced by Delaware County Open MRI in response to subpoena [Designated Confidential pursuant to the Standing Protective Order]
32.	Mayo Clinic web page, referenced in Plaintiffs' Second Amended Complaint
33.	2005 article authored by Bennet Omalu, et al., "Chronic Traumatic Encephalopathy in a National Football League Player"
34.	Sports Legacy Institute press release, "Sports Legacy Institute Announces Findings of Forensic Examinations on Wrestler Chris Benoit's Brain," dated September 5, 2007, produced by Defendant at WWE_SING00000550-570
35.	Letter and certified mail receipt from Jerry McDevitt, Esq. to Chris Nowinski, dated September 25, 2007, produced by Defendant at WWE_SING00000575-578
36.	Letter and attachment from Jerry McDevitt, Esq. to Julian Bailes, dated January 19, 2010, produced by Defendant at WWE_SING00000579-583
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42.	Emailed letter from Robert Fitzsimmons, Esq. to Jerry McDevitt, Esq., dated January 26, 2010, produced by Defendant at WWE_SING00000621-623
43.	2010 article authored by Bennet Omalu, et al., "Chronic traumatic encephalopathy in a professional American wrestler"
44.	Transcript of CNN interview from CNN.com, November 7, 2007, referenced in Plaintiffs' Second Amended Complaint
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46.	Transcript of Deposition of Evan Singleton, taken May 11, 2016
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48.	DVD depicting video of excerpted testimony from the deposition of Evan Singleton, taken May 11, 2016 (DVD filed manually)
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51.	Excerpted testimony from the deposition of Mark Lovell, Ph.D., taken May 24, 2016 [Designated Confidential pursuant to the Standing Protective Order]
52.	Evan Singleton baseline IMPACT test clinical report, dated December 1, 2011, marked as Maroon Depo. Ex. 18, produced by Defendant at WWE_SING00000006-10 [Designated Confidential pursuant to the Standing Protective Order]
53.	WWE Talent Relations Newsletter, dated February 2009, produced by Defendant at WWE_SING00000056-79 [Designated Confidential pursuant to the Standing Protective Order]
54.	Presentation to wrestlers, dated January 25, 2010, produced by Defendant at IMPACT_SING00001875-888 [Designated Confidential pursuant to the Standing Protective Order]
55.	Videotaped presentation to wrestlers, dated January 25, 2010, produced by Defendant at WWE_SING00002999 [Designated Confidential pursuant to the Standing Protective Order] (DVD filed manually)
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67.	<p>New Developmental Talent Orientation document, dated January 16-17, 2014, produced by Defendant at WWE_SING00001042-65</p> <p>[Designated Confidential pursuant to the Standing Protective Order]</p>
68.	<p>New Developmental Talent Orientation document, dated May 5-6, 2014, produced by Defendant at WWE_SING00001066-98</p> <p>[Designated Confidential pursuant to the Standing Protective Order]</p>
69.	<p>Email exchange between Stacy DePolo and Chris Nowinski, dated between July 24-August 25, 2014, produced by Defendant at WWE_SING00002825-827</p> <p>[Designated Confidential pursuant to the Standing Protective Order]</p>
70.	<p>Email from Kristin Altman, dated October 15, 2014, produced by Defendant at WWE_SING00000106</p> <p>[Designated Confidential pursuant to the Standing Protective Order]</p>
71.	<p>Rookie Orientation Agenda, dated October 27-28, 2014, produced by Defendant at WWE_SING00000103</p> <p>[Designated Confidential pursuant to the Standing Protective Order]</p>
72.	<p>New Talent Orientation document, dated October 27-28, 2014, produced by Defendant at WWE_SING00000731-792</p> <p>[Designated Confidential pursuant to the Standing Protective Order]</p>

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73.	Presentation to wrestlers, dated November 30, 2015, produced by Defendant at IMPACT_SING00000112-144 [Designated Confidential pursuant to the Standing Protective Order]
74.	Email from Kristin Altman to Bill DeMott, dated August 3, 2012, produced by Defendant at WWE_SING00000096 [Designated Confidential pursuant to the Standing Protective Order]
75.	Printout of Twitter account for @MercerWWE, marked as Singleton Depo. Ex. 8
76.	Affidavit of Amanda Tustian, dated July 8, 2016
77.	Affidavit of Rob Naylor, dated July 9, 2016
78.	Plaintiff Evan Singleton's Supplemental Objections and Responses to Defendant World Wrestling Entertainment, Inc.'s First and Second Set of Interrogatories, dated March 30, 2016
79.	Printout of Facebook account of Candace Renshaw, marked as Singleton Depo. Ex. 13
80.	Dr. Greenberg Followup Note on Evan Singleton, dated January 18, 2013, produced by Dr. Greenberg in response to subpoena [Designated Confidential pursuant to the Standing Protective Order]
81.	Dr. Greenberg note clearing Evan Singleton to return to normal activity, dated January 18, 2013, produced by Defendant at WWE_SING00000419 [Designated Confidential pursuant to the Standing Protective Order]
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83.	Email exchange between Brian Duncan, Canyon Ceman, and Chris Amann, dated March 7, 2013, produced by Defendant at WWE_SING00002243-244 [Designated Confidential pursuant to the Standing Protective Order]
84.	Email exchange between Brian Duncan, Canyon Ceman, Chris Amann, Jane Geddes, and Stacy DePolo, dated between March 7-14, 2013, produced by Defendant at WWE_SING00002247-249 [Designated Confidential pursuant to the Standing Protective Order]
85.	Affidavit of Stacy DePolo, dated July 27, 2016 [Designated Confidential pursuant to the Standing Protective Order]
86.	MRI report dated November 14, 2012, produced by Dr. Rodgers-Neame in response to subpoena [Designated Confidential pursuant to the Standing Protective Order]
87.	Excerpted testimony from the deposition of Dr. Michelle Mattingly, taken April 26, 2016 [Designated Confidential pursuant to the Standing Protective Order]
88.	Excerpted testimony from the deposition of Dr. Nancy Rodgers-Neame, taken April 29, 2016 [Designated Confidential pursuant to the Standing Protective Order]
89.	Report of examination by Dr. Lovell of Evan Singleton on October 22, 2012, produced by Defendant at WWE_SING00000416-417 [Designated Confidential pursuant to the Standing Protective Order]
90.	Summary of Consultation and Treatment by Dr. Unterberg, dated October 7, 2013, produced by Defendant at IMPACT_SING00000634-638 [Designated Confidential pursuant to the Standing Protective Order]

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91.	Consultation report by Dr. Maroon, dated December 5, 2013, produced by Defendant at IMPACT_SING00000572-575 [Designated Confidential pursuant to the Standing Protective Order]
92.	Concussion Evaluation by Dr. Mattingly of Evan Singleton, dated February 21, 2013, marked as Mattingly Depo. Ex. 28, produced by Dr. Mattingly in response to subpoena [Designated Confidential pursuant to the Standing Protective Order]
93.	Excerpts from transcript of Hearing before The Honorable Vanessa L. Bryant, dated June 8, 2015
94.	DVD depicting video of excerpted testimony from the deposition of Evan Singleton, taken May 11, 2016 (DVD filed manually)
95.	Declaration of Mark R. Lovell, dated July 27, 2016