

# **App. Tab 7**

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.	:	

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

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AFFIDAVIT OF GEORGE GERMANAKOS

State of Connecticut	)	
	)	ss: <i>Stamford</i>
County of Fairfield	)	

I, George Germanakos, being first duly sworn, hereby depose and say:

1. I am over eighteen (18) years of age. I have personal knowledge of the matters set forth herein and am competent to testify thereto.

2. I am employed as Director, Media Clearance and Research of World Wrestling Entertainment, Inc. (“WWE”). In that capacity, I am responsible for overseeing and managing WWE’s video library.

3. WWE’s video library includes past and present WWE footage as well as the video libraries of a number of defunct wrestling promotions, including World Championship Wrestling (“WCW”) and Extreme Championship Wrestling (“ECW”). WWE maintains an index of footage in the video library to enable my staff and me to search for footage by particular criteria, including the name(s) of performers.

4. At my direction, my staff has searched WWE’s video library for footage of Vito LoGrasso’s (“LoGrasso”) matches, including LoGrasso’s matches in ECW and WCW, and I have reviewed the results of that search.

5. The footage of LoGrasso’s matches in ECW and WCW reflects that LoGrasso received blows to the head from chairs and other objects in numerous matches while performing in ECW and WCW.

6. Attached hereto as Exhibit 1 is a true and accurate copy of a video depicting footage from twenty-six (26) of LoGrasso’s matches in ECW and WCW (certain of these matches have multiple clips) in which LoGrasso received blows to the head from chairs and other objects:

Clip No.	Promotion	Air Date	Match Participants	Location
001, 002	ECW	12/26/1998	Rob Van Dam & Bill Alfonso vs. Skull Von Crush & Mr. Wright	Queens, NY
003	ECW	02/12/1999	Skull Von Crush vs. Sabu & Bill Alfonso	Philadelphia, PA

004, 005	ECW	11/07/1999	New Jack, Axl Rotten & Balls Mahoney vs. Da Baldies - Angel, P.N. News, DeVito & Vito LoGrasso	Buffalo, NY
006	ECW	11/05/1999	Da Baldies - Tony DeVito, Angel, & Skull Von Krush) vs. Balls Mahoney & Axl Rotten	Philadelphia, PA
007	ECW	11/19/1999	Balls Mahoney & Axl Rotten vs. Da Baldies - P.N. News & Skull Von Krush	Binghamton, NY
008	WCW	12/27/1999	Disco Inferno & Big Vito with Tony Marinara and Johnny "The Bull" vs. Buff Bagwell & Chris "Champagne" Canyon with J. Biggs, Baby, and Chameleon	Houston, TX
009	WCW	1/16/2000	The Harris Boys - Ron & Don Harris vs. The Mamalukes - Big Vito and Johnny "The Bull" with Disco Inferno	Cincinnati, OH
010, 011	WCW	02/16/2000	Vito with Johnny "The Bull" & Disco Inferno vs. Crowbar with David Flair and Daffney	Philadelphia, PA
012, 013	WCW	02/20/2000	The Mamalukes - Johnny "The Bull" & Big Vito with Disco Inferno vs. David Flair & Crowbar with Daffney	San Francisco, CA
014	WCW	02/28/2000	Big Vito & Johnny "The Bull" vs. Lane & Idol	Minneapolis, MN
015	WCW	03/29/2000	Stevie Ray and Big T with Cash and J. Biggs vs. The Mamalukes - Big Vito and Johnny "The Bull"	Houston, TX
016, 017, 018, 019, 020, 021	WCW	06/12/2000	Big Vito vs. Terry Funk	Richmond, VA

022, 023	WCW	06/19/2000	Big Vito vs. Johnny "The Bull"	Billings, MT
024, 025, 026	WCW	06/21/2000	Big Vito vs. The Wall	Bozeman, MT
027	WCW	07/05/2000	Big Vito vs. The Demon	Columbus, GA
028, 029, 030, 031, 032	WCW	07/09/2000	Big Vito vs. Screamin' Norman Smiley & Ralphus	Daytona Beach, FL
033	WCW	07/10/2000	Screamin' Norman Smiley & Ralphus vs. Big Vito	Jacksonville, FL
034, 035	WCW	07/19/2000	Big Vito vs. The Artist	East Lansing, MI
036	WCW	07/26/2000	Lance Storm vs. Big Vito	Wheeling, WV
037	WCW	09/11/2000	Reno & Chuck Palumbo vs. Big Vito	Charlotte, NC
038	WCW	09/17/2000	Natural Born Thrillers - Mike Sanders, Mark Jindrak, Sean O'Hare, Chuck Palumbo, Reno & Johnny "The Bull" vs. Big Vito & Filthy Animals, Disco Inferno, Rey Myserio Jr. & Juventud Guerrera & Paul Orndorff with Tygress	Buffalo, NY
039, 040, 041	WCW	09/25/2000	Big Vito vs. Johnny "The Bull"	Uniondale Long Island, NY
042	WCW	10/18/2000	Big Vito vs. Shane Douglas with Torrie Wilson	Melbourne, Australia
043	WCW	11/13/2000	Big Vito vs. Crowbar	London, England
044	WCW	01/08/2001	Bam Bam Bigelow vs. Big Vito	Rock Hill, SC
045	WCW	02/28/2001	Rick Steiner vs. Big Vito	New Orleans, LA

7. LoGrasso performed in WCW's Starrcade pay-per-view event ("Starrcade") on December 19, 1999. Following Starrcade, the clips of footage

depicted in Exhibit 1 reflects that LoGrasso received blows to the head from chairs and other objects in twenty-one (21) WCW matches.

8. Attached hereto as Exhibit 2 is a true and accurate copy of a video depicting a slow-motion clip of footage from LoGrasso's October 10, 2006 match in WWE against Steven Regal.

9. LoGrasso's final match in WWE was filmed on January 29, 2007 and aired on WWE SmackDown on February 2, 2007.

I declare under penalty of perjury that the foregoing is true and correct.

  
\_\_\_\_\_  
George Germanakos

Subscribed and sworn to before me  
this 22 th day of June, 2016.

  
\_\_\_\_\_  
Notary Public  
My Commission Expires: 5/31/21

# **Exhibits 1&2**

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EVAN SINGLETON and VITO : No. 3:15-cv-00425 (VLB)  
LOGRASSO, : Consolidated Case  
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ENTERTAINMENT, INC., :  
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**NOTICE OF MANUAL FILING**

Please take notice that Defendant World Wrestling Entertainment, Inc., has manually filed a copy of a CD that is Exhibits 1-2 of Tab 7 to the Appendix to its Local Rule 56(a)(1) Statement because it cannot be filed electronically. The CD has been manually served on all parties.