

# **App. Tab 76**

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 AMANDA TUSTIAN

State of Connecticut            )  
  ) ss:  
County of Fairfield            )

I, Amanda Tustian, 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 currently employed as Manager, WWE Network Operations of World Wrestling Entertainment, Inc. (“WWE”). In November 2012, I was employed as Coordinator, Talent Development of WWE. In that capacity, I was responsible for tracking biographical information of developmental talent including developmental talent’s contact information and social media usernames.

3. Attached hereto as Exhibit 1 is a true and accurate copy of an e-mail entitled “FW: WWE DEVELOPMENTAL TALENT Phone Numbers and General Info (update)” dated November 27, 2012 and the attached spreadsheet entitled “NXT ALL INCLUSIVE SPREADSHEET.xlsx.” All non-party personal information contained in Exhibit 1 has been redacted.

4. The spreadsheet entitled “NXT ALL INCLUSIVE SPREADSHEET.xlsx” was created by Rob Naylor.

5. In November 2012, Rob Naylor was working as an independent contractor of WWE with the job title Creative Assistant, NXT. In that capacity, Rob was responsible for compiling biographical information of developmental talent, including contact information and social media usernames.


6. In November 2012, Rob Naylor worked in Tampa, Florida and interacted with developmental talent on a daily basis.

7. It was and remains WWE’s standard practice to acquire talent information, such as contact information and social media usernames, directly from each talent.

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

  
Amanda Tustian

Subscribed and sworn to before me  
this 8th day of July, 2016.



Notary Public  
My Commission Expires: 12-31-2019

VICTORIA J WALSH  
Notary Public-Connecticut  
My Commission Expires  
December 31, 2019



# Exhibit 1

## FW: WWE DEVELOPMENTAL TALENT Phone Numbers and General Info (update)

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**From:**

"Tustian, Amanda" <[amanda.tustian@wwecorp.com](mailto:amanda.tustian@wwecorp.com)>

**To:**

"DePolo, Stacy" <[stacy.depolo@wwecorp.com](mailto:stacy.depolo@wwecorp.com)>

**Date:**

Tue, 27 Nov 2012 16:53:50 -0500

**Attachments:**

NXT ALL INCLUSIVE SPREADSHEET.xlsx (59.32 kB)

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**From:** "Naylor, Rob" <[Rob.Naylor@wwecorp.com](mailto:Rob.Naylor@wwecorp.com)>

**Date:** Tue, 27 Nov 2012 08:18:55 -0500

**To:** "Martlaro, Matt" <[Matt.Martlaro@wwecorp.com](mailto:Matt.Martlaro@wwecorp.com)>, Microsoft Office User <[amanda.tustian@wwecorp.com](mailto:amanda.tustian@wwecorp.com)>

**Subject:** WWE DEVELOPMENTAL TALENT Phone Numbers and General Info (update)

Here is an updated spreadsheet of our talent's general information, most importantly, with phone numbers.

Thank you,

Rob

	A	B	C	D	E	F	G	H	I
1									
2	NAME	REAL NAME	START DATE	HEIGHT	WEIGHT	DOB	TWITTER	PHONE #	EMAIL
3									
4	ADAM MERCER	Evan Singleton		6'5	260	10/9/1992	WWE Mercer	MercerWWe	evansngltn@gmail.com

Personal Material Redacted

