App. Tab 77

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF CONNECTICUT

RUSS McCULLOUGH, et al.,	: 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.	:			

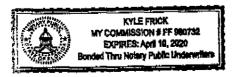
AFFIDAVIT OF ROB NAYLOR

State of Connecticut)
) ss:
County of Fairfield)

- I, Rob Naylor, 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. In November 2012, I was working as an independent contractor for World Wrestling Entertainment, Inc. ("WWE") with the job title Creative Assistant, NXT. In that capacity, I was responsible for compiling biographical information of developmental talent, including contact information and social media usernames.
- 3. In November 2012, I worked in Tampa, Florida and interacted with developmental talent on a daily basis.
- 4. 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 reducted.
- 5. I drafted the spreadsheet entitled "NXT ALL INCLUSIVE SPREADSHEET.xlsx."
- 6. It was my standard practice to acquire the information contained in the spreadsheet entitled "NXT ALL INCLUSIVE SPREADSHEET.xlsx" directly from the talent.
- 7. To the best of my knowledge, the information contained in row 4 of the spreadsheet entitled "NXT ALL INCLUSIVE SPREADSHEET.xlsx" came directly from Evan Singleton.

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



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

Notary Public
My Commission Expires: 4-10-202

Exhibit 1

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

From:

"Tustian, Amanda" <amanda.tustian@wwecorp.com>

To

"DePolo, Stacy" <stacy.depolo@wwecorp.com>

Date:

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

Attachments:

NXT ALL INCLUSIVE SPREADSHEET.xlsx (59.32 kB)

From: "Naylor, Rob" < Rob. Naylor@wwecorp.com >

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

To: "Martlaro, Matt" < Microsoft Office User < martlaro@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

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	А	В	С	D	E	F	G	Н	<u> </u>
1									
3	NAME	REAL NAME	START DATE	HEIGHT	WEIGHT	DOB	TWITTER	PHONE #	EMAIL
4 Pe	^{ADAM MERCER} rsonal Materia	Evan Singleton		6'5	260	10/9/1992	WWEMercer	MercerWWe	evansngltn@gmail.com