

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 redacted.

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.





Rob Naylor

Subscribed and sworn to before me
this 26 th day of July, 2016.



Notary Public

My Commission Expires: 4-10-2020

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" <Matt.Martlaro@wwecorp.com>, Microsoft Office User <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	WWEMercer	MercerWWe	evansngltn@gmail.com

Personal Material Redacted

