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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON (PORTLAND)

WILLIAM ALBERT HAYNES III, individually
and on behalf of all other similarly situated,

Plaintiffs,

v.

WORLD WRESTLING ENTERTAINMENT,
INC.,

Defendant.

Case No. 3:14-cv-01689-ST

**DECLARATION OF B. JOHN CASEY
IN SUPPORT OF DEFENDANT'S
MOTION TO DISMISS**

I, B. John Casey, declare:

1. I am over the age of 18. I make this Declaration based on my personal knowledge, and it is true to the best of my knowledge, information and belief. I am prepared to testify to the matters discussed herein.

2. I am an attorney with K & L Gates LLP and I represent defendant World Wrestling Entertainment, Inc. in this action.

3. Attached as Exhibit A hereto is a true and correct copy of the manuscript for the article: Ann C. McKee et al., “Chronic Traumatic Encephalopathy in Athletes: Progressive Tauopathy following Repetitive Head Injury,” *Journal of Neuropathology & Experimental Neurology*, vol. 68, no. 7, pp. 709–735, 2009.

4. Attached as Exhibit B hereto is a true and correct copy of the article: Bennet I. Omalu, et al., “Chronic Traumatic Encephalopathy, Suicides and Parasuicides in Professional American Athletes: the Role of the Forensic Pathologist,” *American Journal of Forensic Medicine and Pathology*, vol. 31, no. 1, pp. 1–3, 2010.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

DATED this 31st day of March, 2015.

By: /s/ B. John Casey
B. John Casey, OSB #120025

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of March, 2015, I served a copy of the foregoing DECLARATION OF B. JOHN CASEY IN SUPPORT OF DEFENDANT'S MOTION TO DISMISS on the following parties via the Court's CM/ECF System:

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DATED this 31st day of March, 2015.

/s/ B. John Casey
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