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William Albert Haynes III

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

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

Plaintiff,

v.

WORLD WRESTLING
ENTERTAINMENT, INC.,

Defendant.

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

DECLARATION OF WILLIAM ALBERT
HAYNES III IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO
DEFENDANT WWE'S MOTION TO
DISMISS

I, William Albert Haynes, declare under penalty of perjury as follows:

1. I am the named plaintiff in the above captioned matter.
2. I have lived in Portland, Oregon for all times relevant to this litigation.
3. My relationship with the WWE began when Vince McMahon contacted me by telephone at my residence in Oregon. We negotiated the terms of my relationship with the WWE during that conversation.
4. Through my trainer, the above-referenced conversation with Vince McMahon, and other sources, I was given the understanding that I was employed by the WWE in order to expand its influence in Oregon, whose wrestling market was then largely controlled by other regional wrestling organizations.
5. While in the WWE's employ, I participated in at least 4 matches in Oregon.
6. During these events, I suffered numerous blows to the head.
7. I received letters from the WWE at my home in Oregon in at least 2013 and 2014.
8. A true and exact copy of one such letter is appended to this affidavit as Exhibit A.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated this 11th day of May, 2015.

s/William Albert Haynes III
William Albert Haynes III