

EXHIBIT 11

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

RUSS McCULLOUGH, a/k/a "Big Russ McCullough," RYAN SAKODA, and MATTHEW R. WIESE, a/k/a "Luther Reigns," individually and on behalf of all others similarly situated,

Plaintiffs,

vs.

WORLD WRESTLING ENTERTAINMENT, INC.,

Defendant.

**LEAD CONSOLIDATED CASE NO.
3:15-cv-01074-VLB**

AFFIDAVIT OF TERRY BUDD

I, Terry Budd, 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.

2. I am a partner with the law firm K&L Gates LLP and one of the attorneys for World Wrestling Entertainment ("WWE") in this matter. I have been working on this action along with the companion consolidated cases filed by and/or orchestrated by Konstantine W. Kyros (and his affiliated counsel) against WWE involving alleged claims for CTE (the "WWE CTE Litigation").

3. In connection with defending the WWE CTE Litigation, I reviewed the law firm website of Konstantine Kyros and noted that it expressly claims that Mr. Kyros "represents hundreds of former NFL players in over \$750 million lawsuit stemming from concussions suffered by players." A true and correct copy of the KL Kyros Law Firm advertisement captured from KL Kyros Law website is attached as Exhibit A.

4. On the issue of whether Mr. Kyros accurately represented on his website that he “represents hundreds of former NFL players in over \$750 million lawsuit stemming from concussions suffered by players,” I reviewed some materials from the docket of the case *In Re: National Football League Players’ Concussion Injury Litigation*, No. 2:12-MD-02323-AB-MDL-2323 (the “NFL CTE Litigation”) and did not see Mr. Kyros listed as counsel to any of the NFL player plaintiffs. I also spoke to Douglas Burns, Esquire, of the law firm of Paul, Weiss, Rifkind, Wharton & Garrison, which represents the NFL in the NFL CTE Litigation. He advised that Mr. Kyros had not appeared in the litigation as counsel for any of the former NFL players who had asserted claims against the NFL and had not appeared in the negotiations or settlement proceedings with the NFL over the players’ CTE claims to the best of his knowledge and to all outward appearances.

5. A review of various filings from the NFL CTE Litigation along with computer searches of the filings shows that on June 25, 2014 proposed class counsel for the plaintiffs filed a motion seeking an Order for Preliminary Approval of a settlement agreement entitled: **Motion of Proposed Class Counsel for an Order: (1) Granting Preliminary Approval of the Class Action Settlement Agreement; (2) Conditionally Certifying a Settlement Class and Subclasses; (3) Appointing Co-Lead Class Counsel, Class Counsel and Subclass Counsel; (4) Approving the Dissemination of Class Notice; (5) Scheduling a Fairness Hearing; and (6) Staying Matters as to the Released Parties and Enjoining Proposed Settlement Class Members from Pursuing Related Lawsuits (Dkt. 6073) (the “NFL Players’ Settlement Approval Motion”).** Mr. Kyros is not listed as

counsel to the players on the NFL Players' Settlement Approval Motion. That same review showed that various filings were subsequently filed on behalf of players leading up to Judge Anita B. Brody (of the United States District Court for the Eastern District of Pennsylvania) conducting a Fairness Hearing on November 19, 2014 in the NFL CTE Litigation. Mr. Kyros is also not listed on any of the plaintiffs' counsels' numerous filings in the NFL CTE Litigation leading up to the Fairness Hearing. Furthermore, according to searches of the NFL CTE Litigation docket additional objections and substantive filings on the proposed Settlement Agreement were submitted by plaintiffs' counsel for various NFL players after the Fairness Hearing but Mr. Kyros is not listed anywhere as counsel for any players in these additional filings.¹

6. As part of WWE's defending the multiple cases filed by Mr. Kyros in the WWE CTE Litigation and, in particular, the claims filed by Plaintiff William A. Haynes in Oregon against WWE (the "Haynes CTE Suit"), WWE served a Motion for Sanctions (the "Haynes Sanctions Motion") on Mr. Kyros on March 24, 2015 that, among other things, pointed out that WWE's research had shown that Mr. Kyros was not a named lawyer in any of the lawsuits filed against the NFL.²

7. Significantly, although various other players' counsel had filed at different times throughout the proceedings Notices of Appearances in the NFL CTE Litigation, Mr. Kyros had not filed any Notice of Appearance on behalf of any

¹ This Court can take judicial notice of the NFL Players' Settlement Approval Motion and other pleadings filed in the NFL CTE Litigation.

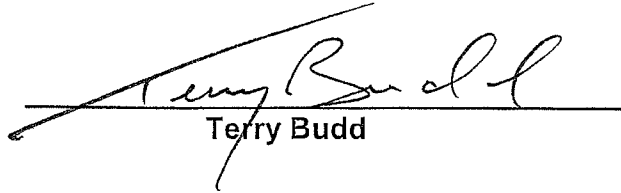
² To avoid burdening the Court with additional materials, WWE has not attached the voluminous Haynes Sanctions Motion with its exhibits but would be pleased to submit it to the Court should the Court wish to see a copy.

NFL players and had not filed any submissions listing himself as counsel for any players until March 31, 2015, which was immediately after WWE served the Haynes Sanctions Motion on Mr. Kyros. Mr. Kyros' filing his Notice of Appearance on behalf of certain NFL players was long after the Fairness Hearing was conducted by Judge Brody and just three (3) weeks before Judge Brody issued her Opinion approving the NFL CTE Litigation Settlement Agreement. The Notice of Appearance filed by Mr. Kyros in the NFL CTE Litigation listed 185 players (although not "hundreds") whom he claimed to represent against the NFL. A true and correct copy of the Notice of Appearance filed by Mr. Kyros is attached as Exhibit B. After looking into Mr. Kyros' Notice of Appearance filing, WWE's counsel is not aware of any specific requirement in the NFL CTE Litigation that would have triggered or necessitated this new filing by Mr. Kyros at that time.

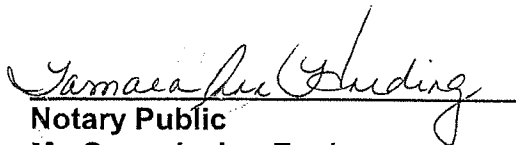
8. Mr. Kyros' filing of his Notice of Appearance months after the Fairness Hearing and just weeks before Judge Brody approved the NFL CTE Litigation Settlement Agreement was made by Mr. Kyros only one (1) week after WWE served its Haynes Sanctions Motion on Mr. Kyros in the Haynes CTE Suit.

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

DATED this this 6th day of November, 2015.


Terry Budd

Subscribed and sworn to before me
this 6th day of November, 2015.

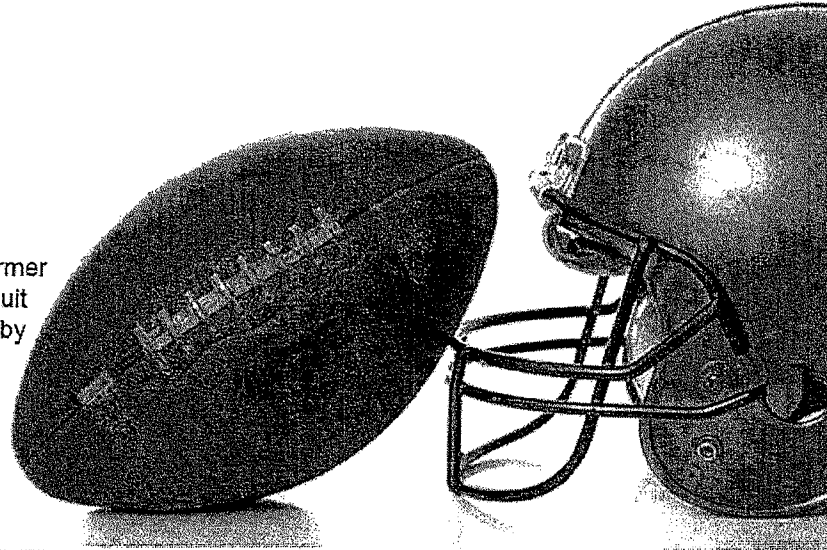

Notary Public
My Commission Expires:

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Tamara Ann Harding, Notary Public
City of Pittsburgh, Allegheny County
My Commission Expires May 14, 2018
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

EXHIBIT A

\$750 MILLION

Kyros Law represents hundreds of former NFL players in over \$750 million lawsuit stemming from concussions suffered by players.



We represent WHISTLEBLOWERS

SEC and FCPA, Claims for retaliation under Sarbanes-Oxley Act

We protect INVESTORS

Federal and Securities shareholder cases and derivative actions, FCPA, Retention

We protect TAXPAYERS

Medicare Fraud, Defense Contractors, Unsub and abuse under the False Claims Act

We protect CONSUMERS

Consumer Class Actions, Arbitration, Repetitive and Catastrophic Injuries, Mass Torts

NEWS UPDATE

> Kyros Law files second WWF/WWE Concussion Lawsuit on behalf of former wrestlers, Evan Singleton &



EXHIBIT B

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL PLAYERS'
CONCUSSION INJURY LITIGATION,

Plaintiff, .

vs. .

MDL No. 2323

12-md-2323

NATIONAL FOOTBALL LEAGUE, et al., .

Defendants, .

**NOTICE OF APPEARANCE OF COUNSEL FOR SELECTED
FORMER PLAYERS**

Pursuant to MDL Rule 2.1 (c), and MDL No. 2323 Case Management Order No. 1 paragraph 14, the undersigned Plaintiffs' counsel hereby gives notice that Konstantine Kyros of Kyros Law represents the following NFL players in this case:

- 1) Eric Allen
- 2) Bruce Anderson
- 3) Jason Berryman
- 4) Corey Bird
- 5) William Bowens
- 6) Wilson Bowie
- 7) James Boyd
- 8) Paul Bradford
- 9) Dorothy Bradley for David Bradley
- 10) Steven Brannon
- 11) Bobby Brooks
- 12) Chris Brown
- 13) Gary Bugenhagen
- 14) Anthony Carifa
- 15) Roger Caron

- 16) Clanton Carter
- 17) Wendell Cason
- 18) Greg Clark
- 19) Anthony Cook
- 20) Keith Council
- 21) Dameyune Craig
- 22) Terence Crosby
- 23) John Curtis
- 24) Charles Davis
- 25) Steve Davis
- 26) Wendell Davis
- 27) Michael Douglass
- 28) Ken Downing
- 29) Marvin Dunn
- 30) Sean Dykes
- 31) Alan Ellis
- 32) Greg Engel
- 33) Tommy Fagan
- 34) Dan Farrogut for Kenneth Farrogut
- 35) Gary Farmer
- 36) Joseph Ferraro
- 37) John Fletcher
- 38) Anthony Florence
- 39) Mike Flores
- 40) Larry Franklin
- 41) Dwight Garner
- 42) Darren Gilbert
- 43) Hank Goebel
- 44) DeMingo Graham
- 45) Charles Green
- 46) Joe Green
- 47) Randy Grimes
- 48) Jimmy Hanna
- 49) George Harris
- 50) Perry Hartnett
- 51) John Harris
- 52) Marvin Harvey
- 53) Maurice Harvey
- 54) George Hazelton
- 55) Steve Heimkreiter

- 56) Anthony Henton
- 57) Donald Herron
- 58) Judith Hill Horton (Estate of Jimmy Hill)
- 59) Oliver Hoyte
- 60) Darren Hughes
- 61) Robert Hudson
- 62) Cletidus Hunt
- 63) Michael Hunt
- 64) Herman Hunter
- 65) Ivy Joe Hunter
- 66) Donald Igwebuke
- 67) Robert Jackson
- 68) Maureen Helinski for Valerio Jasante
- 69) Charles Ray Jefferson
- 70) Eugene Jeter
- 71) Curtis Johnson
- 72) Danny Ray Johnson
- 73) Darrius Johnson
- 74) Richard Johnson
- 75) Chris Jones
- 76) Melvin Jones
- 77) Keith Jones
- 78) Mr. Travis Jones for Jimmie Lee Jones
- 79) Nathaniel James
- 80) Reggie Jones
- 81) Tony Jones
- 82) Victor Jones
- 83) Jason Kaiser
- 84) Jim Kalafat
- 85) Gordon Kelley
- 86) Charles Klingbell
- 87) RJ Kors
- 88) Mat Kranchik
- 89) Shane Laakso/ Estate of Eric Laakso
- 90) Walter Landers
- 91) Dan Lanphear
- 92) Norman LeJeune, Jr
- 93) Jonas Lewis
- 94) Warren Livingston

- 95) Regina Loonie/ Estate of Houston Antwine
- 96) Evelyn Lovetere for John Lovetere
- 97) Carolyn Malone for Art Malone
- 98) Kenneth McAllister
- 99) Bufford McGee
- 100) Brandon McGowarn
- 101) Ms. Sally Stern Estate of Andy Miketa
- 102) Paul Miles
- 103) Eugene Milton
- 104) Lincoln Minor
- 105) Bobby Mitchell
- 106) Ed Modzelewsik
- 107) Aries Monroe
- 108) Mrs. Stephanie Moore Estate of Booker Moore
- 109) Ms. Katherine Moppin Estate John Henry Johnson
- 110) Allan Morrison
- 111) Haywood Myers
- 112) Derrick Ned
- 113) Mark Nichols
- 114) Josephine Norton for James Norton
- 115) Djuanna Oglesby for Alfred Ogelsby
- 116) Michael L. Obrovac
- 117) Joe O'Malley
- 118) Willis Owens
- 119) Donald Patterson
- 120) Jeffery Pegues
- 121) Don Perkins
- 122) Walter Pursuit
- 123) Timothy Peterson
- 124) Stan Petry
- 125) Irvine Phillips
- 126) Jim Phillips
- 127) Mr. Charles Philyaw
- 128) Ray Pinion
- 129) Joseph Przybycki
- 130) Lovett Purnell
- 131) Rollin Putzier
- 132) Eric Ravotti
- 133) Mary Riehm for Chris Riehm

- 134) Guy Roberts
- 135) Vernon Robertson
- 136) Paul Robinson
- 137) Andre Rountree
- 138) Connie Rutkowski for Charles Rutowski
- 139) Gregory Scales
- 140) Ed Scott
- 141) Tony Scott
- 142) Anthony Shelton
- 143) John Shinnars
- 144) Cleo Simmons
- 145) Reggie Singletary
- 146) Richard Skelley
- 147) Stanley Smagala
- 148) Jimmy Smith
- 149) Danny Spradlin
- 150) Delona Pennington for John Stephens
- 151) Renee Nicholas John Milton Steven
- 152) Joseph Stewart
- 153) Todd Stewart
- 154) George St James
- 155) Vernon Studdard
- 156) Tamara Sumpter for Frank Sumpter
- 157) Richard Teets, Jr
- 158) Sandra Teets for Richard Teets, Sr
- 159) Ryan Terry
- 160) Charles Thomas
- 161) Johnny Thomas
- 162) John Thornton
- 163) Elaine Tomasic for Andy Tomasic
- 164) Paul Tripoli
- 165) Cecil Turner
- 166) Rick Upchurch
- 167) Greg Veldman
- 168) Charlie Wade
- 169) Robert Charles Wallace
- 170) John E Washington
- 171) Joseph Washington
- 172) Tyree Washington

- 173) Dennis Watkins
- 174) Robert (Bob) West
- 175) Mark Wheeler
- 176) Sammy White
- 177) (Whitley) Fred Camarena (Grandfather of Whitley Children)
- 178) Alphonso Williams
- 179) Greg Williams
- 180) Jamar Williams
- 181) Stanley Winfrey
- 182) Nathaniel (Nate) Wright
- 183) Jerome Woods
- 184) Michael Todd Young
- 185) Almon Young, Jr

Dated: March 28, 2015

Respectfully Submitted,

By: /s/ Konstantine Kyros

Konstantine Kyros

(Mass Bar No. 634442)

KYROS LAW

17 Miles Rd

Hingham, MA 02043

T: 1-800-934-2921

kon@kyroslaw.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing NOTICE OF APPEARANCE was electronically filed with the clerk of Court of the United States District Court for the Eastern District of Pennsylvania by using the CM/ECF System, which will send notice of the electronic filing in accordance with the procedures established in MDL 2323, on this 31st Day of March, 2015.

Respectfully Submitted,

By: /s/ Konstantine Kyros

Konstantine Kyros

KYROS LAW

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