

# **EXHIBIT 15**

# Billy Jack Haynes

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*"Blackblood" redirects here. For the fictional robot, see ABC Warriors § Blackblood.*

**William Albert Haynes III**<sup>[1]</sup> (born July 10, 1953)<sup>[1]</sup> is a retired American professional wrestler better known as **Billy Jack Haynes**.

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## Professional wrestling career

### Early career (1982–1984)

Haynes started wrestling in 1982 at the age of 28. He trained in Stu Hart's Dungeon pro wrestling school and briefly wrestled in Hart's Stampede Wrestling under his given name, forming a tag team with Bruce Hart. He started wrestling as Billy Jack in the Pacific Northwest territory but had to change his name when Tom Laughlin (who starred in the movie *Billy Jack*) threatened to sue him. He added his real last name to the gimmick and continued to work as a babyface.

### Championship Wrestling from Florida and Pacific Northwest Wrestling (1984–1986)

He feuded heavily with Rip Oliver until 1984, when he had a run in Championship Wrestling from Florida and then had a brief run in World Class Championship Wrestling in 1985. Due to internal conflict between Fritz Von Erich and Billy, he was written out of the organization, jobbing to Rip Oliver in a storyline where Rip bloodies and injured Billy. He rarely stayed put in any federation that he went

<b>Billy Jack Haynes</b>	
<b>Birth name</b>	William Albert Haynes III
<b>Born</b>	July 10, 1953 <div>Portland, Oregon<sup>[1]</sup></div>
<b>Residence</b>	Gaston, Oregon
<b>Spouse(s)</b>	Jeanie Clarke (m. 1986–89) Rita Pena (m. 1994–99) Meredith Fletcher (m. 2008)
<b>Professional wrestling career</b>	
<b>Ring name(s)</b>	Billy Jack <div>Billy Jack Haynes<sup>[1]</sup></div> <div>Billy Haynes</div> <div>Black Blood</div>
<b>Billed height</b>	6 <span> </span> ft 3 <span> </span> in (191 <span> </span> cm) <sup>[1]</sup>
<b>Billed weight</b>	245 <span> </span> lb (112 <span> </span> kg) <sup>[1]</sup>
<b>Billed from</b>	Portland, Oregon, <sup>[1]</sup> A Little Town in France (as Black Blood) Tucson, AZ (Stampede)
<b>Trained by</b>	Stu Hart
<b>Debut</b>	1982 <sup>[2]</sup>
<b>Retired</b>	1996

to. During that time he face off against the debuting Shawn Michaels. He started splitting his time between Portland Wrestling and CWF and wrestled with partner Wahoo McDaniel in the National Wrestling Alliance's Jim Crockett Promotions where they feuded with Ole and Arn Anderson. He had just begun a feud with The Barbarian over who was the strongest man in the territory when he abruptly left the company after a confrontation with Jim Crockett in his office which became physical.

### **World Wrestling Federation (1986–1988)**

In 1986, Haynes went to the World Wrestling Federation and feuded with Randy Savage over the Intercontinental Championship<sup>[2]</sup> and then with Hercules Hernandez over who was stronger, more muscular, and who had a better version of the full nelson (their mutual finishing maneuver). Their feud in the WWF peaked with what was dubbed "The Battle of the Full Nelsons" at WrestleMania III,<sup>[2]</sup> where the two men battled to a double count-out. After the bell, Hercules' manager Bobby "The Brain" Heenan kned Haynes in the back while he had Hercules in a full nelson out on the floor. Haynes chased Heenan into the ring where Hercules blindsided him with his trademark chain, hitting Haynes multiple times and (Kayfabe) cutting his forehead (in reality, Haynes had bladed himself with a small razor hidden in the tapes around his wrists after the first hit.<sup>[3]</sup> He was actually seen on camera taking the razor out of his wrist tapes while chasing Heenan around the ring).

In the months to follow, the two had a series of "chain matches," where they were attached at the wrist by a foot long chain which could also be used as a weapon during the match. Haynes later teamed with fellow Oregon native Ken Patera who had returned to the WWF.<sup>[3]</sup> Haynes saved Patera from a beating at the hands of Hercules and "The King" Harley Race after Patera's return match.<sup>[3]</sup> The pair would later feud with Demolition after a television match where Demolition left Haynes, Patera, and Brady Boone (who played Haynes' cousin) beaten and lying in the ring.<sup>[3]</sup>

Haynes' departure from the WWF has been a subject of controversy considering dramatic changes in the story as Haynes repeated it. In one version, he says he quit the WWF after refusing to do a job in his hometown of Portland, Oregon.<sup>[4]</sup> Another account of the same incident reported that he actually wrestled the match with the finish reworked and then fired afterwards.<sup>[5]</sup>

### **Other wrestling promotions (1988–1996)**

Haynes went back to Oregon in 1988 and wrestled in their independents, including forming his own promotion, Oregon Wrestling Federation. In the early 1990s he did several shows for Herb Abrams' Universal Wrestling Federation, where they built up another strongman feud between Haynes and Ken Patera. Haynes returned to the major promotions when he appeared under a mask in World Championship Wrestling as Black Blood in Kevin Sullivan's stable.<sup>[6]</sup> Soon after The Great American Bash, he was fired in July 1991, due to a pay dispute.<sup>[6]</sup> At the time he was fired, he suffered a severe knee injury. After a year and a half of rehabbing, he went back to Portland, where he was a heel this time and feuded with top babyface Steve Doll. He showed up next in the United States Wrestling Association in 1995 and retired in early 1996.

## Personal life

On March 16, 2013, Haynes was hospitalized because he was suffering from an aortic aneurysm, and liver and kidney issues.<sup>[7]</sup>

In October 2014, the *Portland Tribune* reported that Haynes filed a lawsuit in federal court against WWE, alleging "egregious mistreatment of its wrestlers for its own benefit, as well as its concealment and denial of medical research and evidence concerning traumatic brain injuries suffered by WWE wrestlers." Haynes also seeks for the court to grant class action status for hundreds of former wrestlers and to force WWE to establish a medical trust fund to pay for wrestlers who suffer from injuries that took place in a WWE ring.<sup>[7]</sup> Former WWE stars Vito LoGrasso and Adam Mercer filed a class action lawsuit against WWE in January 2015 while being represented by the same lawyer as Haynes.<sup>[8]</sup>

## In wrestling

- **Finishing moves**
  - Full nelson<sup>[2]</sup>
  - *La Guillotine* (Diving knee drop)
- **Signature moves**
  - Argentine backbreaker rack
  - Bearhug
  - Dropkick
  - Leg drop

## Championships and accomplishments

- **Championship Wrestling from Florida**
  - NWA Florida Heavyweight Championship (1 time)
  - NWA United States Tag Team Championship (*Florida version*) (1 time) - with Wahoo McDaniel
- **Oregon Wrestling Federation**
  - OWF Heavyweight Championship (2 times)<sup>[9]</sup>
- **Pacific Northwest Wrestling**
  - NWA Pacific Northwest Heavyweight Championship (5 times)
  - NWA Pacific Northwest Tag Team Championship (3 times) - with Stan Stasiak (2) and Ricky Vaughn
- **Pro Wrestling Illustrated**
  - PWI Most Improved Wrestler of the Year (1984)
- **United States Wrestling Association**
  - USWA Southern Heavyweight Championship (2 times)
- **World Class Championship Wrestling**
  - WCCW Television Championship (1 time)

## References

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## External links

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Categories: 1953 births | American male professional wrestlers | Living people  
| Professional wrestlers from Oregon | Professional wrestling promoters

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