

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

**MICHELLE JAMES, as mother and next  
friend of MATTHEW OSBORNE, a  
Minor Child and TEAGAN OSBORNE, a  
Minor Child**

**Plaintiff,**

**vs.**

**WORLD WRESTLING  
ENTERTAINMENT, INC.,**

**Defendant.**

**Case No. 3:15-CV-01305-VLB**

**September 11, 2015**

**EXHIBIT 2**  
**TO DEFENDANT WORLD WRESTLING ENTERTAINMENT, INC.'S**  
**MOTION FOR SANCTIONS**

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

MICHELLE JAMES, as mother and next  
friend of MATTHEW OSBORNE, a  
Minor Child and TEAGAN OSBORNE, a  
Minor Child,

Plaintiff,

vs.

WORLD WRESTLING  
ENTERTAINMENT, INC.,

Defendant.

Case No. 3:15-CV-01305-VLB

AFFIDAVIT OF CURTIS B. KRASIK

I, Curtis B. Krasik, 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 an attorney duly authorized and admitted to practice law before this Court. I am a partner with the law firm K&L Gates LLP and one of the attorneys of record for the Defendant World Wrestling Entertainment, Inc. ("WWE") in this action and in the related cases pending in this Court under lead consolidated case caption *McCullough et al. v. World Wrestling Entertainment, Inc.*, No. 3:15-cv-01074-VLB.

3. Attached hereto as Exhibit A is a true and accurate copy of a July 30, 2015 Pittsburgh Post-Gazette online article entitled "WWE's Stephanie McMahon Joins Children's Hospital Foundation Board."

4. Attached hereto as Exhibit B is a true and accurate copy of Defendant WWE's Motion for Sanctions Pursuant to Rule 11, 28 U.S.C. § 1927 and the Court's Inherent Authority in *LoGrasso, et al. v. World Wrestling Entertainment, Inc.*, Civil Action No. 3:15-cv-00425-VLB (D. Conn.) that was served on plaintiffs' counsel on July 6, 2015.

5. Attached hereto as Exhibit C is a true and accurate copy of an email exchange dated August 11, 2015 between WWE's counsel and Plaintiff's counsel.

6. Attached hereto as Exhibit D is a true and accurate copy of October 29-30, 2014 online media reports from TMZ, UPROXX and Perez Hilton.

7. Attached hereto as Exhibit E is a true and accurate copy of the Certificate of Death issued by the State of Tennessee for Nelson Lee Frazier, Jr. dated February 18, 2014.

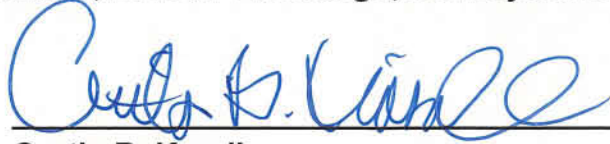
8. Attached hereto as Exhibit F is a true and accurate copy of an email exchange dated May 28, 2015 between WWE's counsel and Plaintiff's counsel.

9. Attached hereto as Exhibit G is a true and accurate copy of a December 9, 2009 ESPN online article titled "Doctors: Wrestler Had Brain Damage."

10. Attached hereto as Exhibit H is a true and accurate copy of a December 2, 2010 Pittsburgh City Paper online article titled "Heavyweight Champions."

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

Executed this 10th day of September, 2015 in Pittsburgh, Pennsylvania.



Curtis B. Krasik

Subscribed and sworn to before me  
this 10th day of September, 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