

EXHIBIT A

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

MARCUS BAGWELL and SCOTT LEVY, :
Individually and on behalf of all others :
Similarly situated, : Civil Action No. 3:16-cv-01350-JCH
: :
Plaintiffs, :
: :
vs. : Hon. Janet C. Hall
: :
WORLD WRESTLING :
ENTERTAINMENT, INC., :
: :
Defendant. :

DECLARATION OF SCOTT LEVY

Pursuant to 28 U.S.C. § 1746, I, Scott Levy declares as follows:

1. I am over eighteen (18) years of age and have personal knowledge of the matters attested to herein.
2. I am the named Plaintiff and class representative in this matter.
3. I respectfully submit this declaration in support of Plaintiff's Response in Opposition to Defendant World Wrestling Entertainment Inc.'s ("WWE") Motion to Compel Regarding Privilege Issues. I make this declaration based on my personal knowledge and information available to me to the best of my recollection and I am competent to testify to the matters forth herein.
4. I am generally familiar with the provisions in my WWE booking contract relating to royalties for the sale of video products. For years, I have received royalty statements from the WWE for the sale of video products in which I appear.

5. In 2014, I learned that I was featured in video products available on the WWE Network. At that time, I believed I may be entitled to royalties under my WWE booking contract for the use of my likeness in those video products.

6. In or around 2014 and 2015, I asked several colleagues to help me find an attorney to investigate potential claims against the WWE and pursue avenues of relief.

7. Prior to March 2016, I had conversations with Attorney Bill Kyros regarding my employment at the WWE and my booking contract with WWE. Attorney Kyros was investigating potential personal injury claims against the WWE relating to concussions that I had sustained while performing as a wrestler for the WWE.

8. During the course of my communications with Attorney Kyros, I also provided other information to him regarding my suspicion that I was not receiving royalties from the WWE Network.

9. I asked Attorney Kyros to help me find an attorney who could provide an analysis of my WWE booking contract and the merits of any claim for royalties from the WWE Network.

10. In order to facilitate the investigation of my claim for royalties from the WWE Network, I authorized Attorney Kyros to share my email address and confidential information provided to him about my contractual relationship with WWE.

11. Attorney Kyros agreed to help me find an attorney to further investigate my potential royalties claim.

12. It is my understanding that Attorney Matthew Peterson contacted me on March 16, 2016 via email as a result of Attorney Kyros's referral. I believed that Attorney Peterson was referred to me for the purpose of investigating potential royalties claims and to provide legal advice.

13. On March 16, 2016, Attorney Peterson sent me an email containing a case analysis of my claim for royalties from the WWE Network. Attorney Peterson's March 16, 2016 email was sent directly to me and only to me.

14. When I received Attorney Peterson's March 16, 2016 email, in light of the circumstances, I believed that his email was responding to my request for legal assistance and that he was acting on my behalf as my attorney.

15. Given the contents of Attorney Peterson's March 16, 2016 email, I understood and believed that the email was confidential in nature.

16. As a result of my communications with Attorney Peterson and his efforts in investigating potential claims on my behalf, I ultimately retained Attorney Peterson's law firm to represent me and prosecute this matter.

17. I was married to Marguerite Reynolds for 5 years. During that time, Ms. Reynolds also served as my manager and advisor regarding important personal matters and business ventures, including my employment as a sports entertainment performer and wrestler.

18. Although Ms. Reynolds and I are no longer married, she continues to manage some of my business affairs.

19. Because of Ms. Reynolds's familiarity with my employment at Defendant World Wrestling Entertainment, Inc. and my wrestling career, she has been involved in this matter to assist me in providing information to my legal counsel for the purpose of obtaining legal advice.

20. Specifically, Ms. Reynolds has helped me recall or locate certain information to provide to my counsel to facilitate the rendition of legal advice. Ms. Reynolds has also helped me search for and collect relevant documents at the request of counsel.


21. It is my understanding that the claims asserted in this action relate to the obligation to pay royalties for portraying video products depicting my wrestling performances on the WWE Network. Further, it is my belief that the WWE Network contains video products featuring myself while I was employed by other wrestling organizations, including World Championship Wrestling and Extreme Championship Wrestling.

22. When I requested that Ms. Reynolds join me at a meeting with counsel and Plaintiff Marcus Bagwell, I believed that her presence would be helpful in providing valuable information to my counsel regarding my wrestling career at various organizations.

23. During the course of the meeting with counsel, Plaintiff Marcus Bagwell, and Ms. Reynolds, I understood that our communications were confidential in nature.

I declare under penalty of perjury under the laws of the State of Georgia that the foregoing to is true and correct.

Executed on November 13, 2017 in Atlanta, Georgia.



Scott Levy