

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

BRIAN P. JACK

CASE NO. 8:13-CV-2442-T-33TBM

Plaintiff,

vs.

**STEVE KEIRN, individually; STEVE KEIRN,
INC., D.B.A FLORIDA CHAMPIONSHIP WRESTLING;
NXT WRESTLING and LIMITED PARTNERSHIP, formerly known as
FLORIDA CHAMPIONSHIP WRESTLING;
WORLD WRESTLING ENTERTAINMENT, INC.;
VINCENT K. MCMAHON D.B.A WORLD WRESTLING
ENTERTAINMENT, and individually;
STEVE KEIRN D.B.A WORLD WRESTLING
ENTERTAINMENT;
ANTHONY CARELLI D.B.A WORLD WRESTLING
ENTERTAINMENT, and individually;**

FILED
2014 MAR 21 AM 11:01
U.S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA, FLORIDA

DAVID OTUNGA D.B.A WORLD WRESTLING
ENTERTAINMENT, and individually;
THOMAS PRICHARD D.B.A WORLD WRESTLING
ENTERTAINMENT, and individually;
JOHN LAURANEITIS D.B.A WORLD WRESTLING
ENTERTAINMENT, and individually;
TY BAILEY D.B.A WORLD WRESTLING
ENTERTAINMENT, and individually;
VIRGIL RUNNELS D.B.A WORLD WRESTLING
ENTERTAINMENT, and individually;
FLOYD GERALD BRISCO D.B.A WORLD WRESTLING
ENTERTAINMENT, and individually;
ROBERT REMIS D.B.A WORLD WRESTLING
ENTERTAINMENT, and individually;
PIERRE CLERMONT D.B.A WORLD WRESTLING
ENTERTAINMENT, and individually;
RICHARD BLOOD D.B.A WORLD WRESTLING
ENTERTAINMENT, and individually;
NORMAN SMILEY D.B.A WORLD WRESTLING
ENTERTAINMENT, and individually;

PETE GRUNER D.B.A WORLD WRESTLING

ENTERTAINMENT, and individually;

SCOTT AMANN D.B.A WORLD WRESTLING

ENTERTAINMENT, and individually;

KRISTIN ALTMAN D.B.A WORLD WRESTLING

ENTERTAINMENT, and individually;

DR. JAMES ANDREWS D.B.A WORLD WRESTLING

ENTERTAINMENT, and individually;

Defendants.

THIRD AMENDED COMPLAINT FOR DAMAGES

AND DEMAND FOR JURY TRIAL

COMES NOW BRIAN P. JACK, Plaintiff in the above-entitled action, as party pro se, and for causes of action against Defendants STEVE KEIRN, individually, STEVE KEIRN, INC., D.B.A FLORIDA CHAMPIONSHIP WRESTLING; NXT WRESTLING, formerly known as FLORIDA CHAMPIONSHIP WRESTLING;

WORLD WRESTLING ENTERTAINMENT, INC., STEVE KEIRN D.B.A WORLDWRESTLING ENTERTAINMENT; as well as Defendants, VINCENT K. MCMAHON, ANTHONY CARELLI, DAVID OTUNGA, TOM PRICHARD, JOHN LAURANEITIS, TY BAILEY, VIRGIL RUNNELS, JERRY BRISCO, ROBERT REMIS, PAT PATTERSON, RICHARD BLOOD, NORMAN SMILEY, PETE GRUNER, SCOTT AMANN, KRISTIN ALTMAN, DR. JAMES ANDREWS, RSUI GROUP, INC., and SHED MEDIA US INC.; and, hereby alleges as follows:

I. NATURE OF ACTION

1. This is an action for damages, compensation and losses resulting from the malfunction and collapse of a wrestling ring located on the former premises of the Florida Championship Wrestling training facility which was located in Tampa, Florida while in the ownership, use, maintenance, management, video surveillance of said wrestling ring and operation of the above named Defendants. This action is further to recover for losses resulting from breach of contract, breach of the obligation of good faith and fair dealing, negligence/negligent misrepresentation; negligent supervision of employees/agents and authorized actors, intentional and negligent infliction of emotional distress, fraud, fraud in the inducement to contract, fraudulent misrepresentation, negligent maintenance of property conditions and premises liability; gross negligence, intentional interference with business opportunity, conversion of pecuniary interest or interference with contractual relationships.

Plaintiff seeks a judgment from the above named Defendants, individually and collectively, for past and future medical and hospital expenses, mental anguish, emotional distress, past and future lost wages, loss of earning capacity as a professional wrestler and entertainer, temporary and permanent injuries, pain and suffering, loss of ability to earn money, permanent disfigurement and scarring, loss of enjoyment of life, consequential damages, contract damages, pre and post judgment interest, and all other damages as provided by applicable law. This amendment is made after an Order of this Court dated January 23, 2014.

Consequently, Plaintiff reserves the right to amend his Complaint further under the Federal Rules of Civil Procedure as a matter of course, or alternatively moves this Court for leave to do the same pursuant to Fed. R. Civ. P. 15.

II. JURISDICTION AND VENUE

2. Plaintiff alleges that the above entitled Court has subject matter jurisdiction to entertain and decide the causes of action brought forth by this Complaint pursuant to rule 1332(a) of United States Code, in that the matters in controversy herein exceed the sum of \$75,000.00, exclusive of interest, costs and attorney fees. As damages the Plaintiff seeks in excess of 150,000 in medical bills, consequential damages, lost profits, and other elements of damages, including punitive damages in an appropriate amount. Further, there is complete diversity of citizenship between the Plaintiff and each named Defendant. Specifically, as further alleged below, the Plaintiff's citizenship for diversity purposes is the State of Wisconsin, while the Defendants are all citizens of Connecticut, Florida and one Defendant has questionable dual residency in Florida/Canada.

3. This Court is the proper venue for this action in that the acts described herein which are the subject of this action are alleged to have been perpetrated by the Defendants in Hillsborough County, Florida. The Court has jurisdiction over the subject matter of this cause.

4. Plaintiff further alleges that this Court's jurisdiction encompassing Hillsborough County is a proper because Defendants heretofore named, purposefully and voluntarily executed their tortuous and actionable actions within said jurisdiction.

III. PARTIES

5. Plaintiff, BRIAN P. JACK, has at all times relevant hereto resided in now said Waupaca County and is a citizen for diversity purposes of the State of

Wisconsin.

6. Defendant, STEVE KEIRN (hereinafter, “Defendant Keirn “), is an individual who, at all times relevant hereto, resides in and for diversity purposes is a citizen of the State of Florida.

7. Defendant, STEVE KEIRN, INC., D/B/A FLORIDA CHAMPIONSHIP WRESTLING (hereinafter, “Defendant FCW”), is a corporation incorporated under the laws of the State of Florida with its principal place of business located at 4535 South Dale Mabry Highway, Tampa, Florida 33611. Defendant FCW pursuant to its incorporation in Florida, as well as its previously stated principal place of business being in Florida, is a corporate citizen of the State of Florida for diversity purposes. Defendant FCW publically admits to have been “sanctioned and reorganized” by World Wrestling Entertainment., and is believed to have other corporate or business affiliations or associations with World Wrestling Entertainment, Inc. that have yet to be discovered at all times pertinent to the fact and circumstances described in this action. Defendant FCW may be served with process of this Court through its registered agent, Stephen P Keirn, a.k.a Steve Keirn, at the address of 12910 Cinnamon Place, Tampa, Florida.

8. Defendant, WORLD WRESTLING ENTERTAINMENT, INC.(hereinafter, “Defendant WWE”) is a corporation that is publically traded, formed under the laws of the State of Connecticut with its principal place of business at 1241 E. Main Street, Stamford, Connecticut 06902-3520. For diversity purposes Defendant WWE is a corporate citizen of the State of Connecticut. Defendant WWE may be served through its registered agent, CT Corporation Systems, One Corporate Center, Hartford, Connecticut 06103-3220.

9. Defendant, NXT WRESTLING (hereinafter, “Defendant NXT”) is a professional wrestling promotion organized under the laws of the State of Florida. Defendant NXT’s principal place of business is located at 5055 Forsyth Commerce Road, Orlando, Florida. For diversity purposes the corporate citizenship for NXT is the State of Florida. From 2008 onwards, the promotion has served as the “official developmental territory for the World Wrestling Entertainment, Inc.” and

is believed to have other corporate or business affiliations or associations and ownership with World Wrestling Entertainment, Inc. that have yet to be discovered at all times pertinent to the fact and circumstances described in this action.

10. Defendant, VINCENT K. MCMAHON(hereinafter, “Defendant McMahon”) is the acting CEO and Chairman of Defendant WWE from 1980 to present. For diversity purposes Defendant McMahon resides in Connecticut. Defendant McMahon was definitely aware of Plaintiffs hazing by Co-Defendant, Keirn and placement of plaintiff at Co-Defendant WWE’s “official developmental territory” at Co-Defendant, FCW training facility, by Defendant WWE talent relations, Plaintiff Brian P Jack believes in good faith and has knowledge that nothing is done without Defendant McMahons ok. Allegedly Plaintiff was told in writing Defendant McMahon was brought a video Plaintiff created, called “Buck Wild Wrestler, Your Outdoor Adventurist, Animal Enthusiast, Conservationist, and Friend “by Co- Defendant, Virgil Runnels a.k.a Dusty Rhodes in charge of Creative at developmental.

Plaintiff was told in writing by Co-Defendant, Anthony Carelli a.k.a WWE Santino Marella (Plaintiffs roommate before and after said time of injury, and duration of 4 months on a broken and mangled leg while Plaintiff suffered trying to get surgical remedy while my roommate saw Defendant McMahon every week) Plaintiffs roommate and now said Co-Defendant, Anthony Carelli told Plaintiff in writing, that Defendant McMahon was going to hire Plaintiff, based off Plaintiffs video and creativity while knowing Plaintiff was placed at Defendant WWE developmental after a camp in which Plaintiff was hazed by Defendant Keirn in front of 60 people when Defendant Keirn stopped a contract from being offered to Plaintiff, at the first ever FCW training camp that Defendant Keirn lured Plaintiff to, after breaking Plaintiffs neck and hazing and harassing Plaintiff Brian P Jack in the past, which the Plaintiff told Co-Co-Defendant TyBailey, head of talent relations about my past and my fear of Co-Defendant Keirn, especially after the camp. Defendant Keirn has hurt me in the past physically, which the Tampa Bay Buccaneers Neurosurgeon Scott Cutler had to perform a spinal fusion at C5 C6 level due to Keirns harassing behavior and physical hazing, that broke Plaintiff Brian P Jacks body as well as vulgar sexual homosexual harassing comments from

Defendant Keirn..

Plaintiff Brian P Jack told Co-Defendant Ty Bailey, Co-Defendant Ty Bailey head of Talent relations laughed at Plaintiff and told Plaintiff if he wanted a contract that Plaintiff Brian P Jack had to go work it out with Defendant Keirn, all expenses paid.

Co-Defendant Anthony Carelli and a man named Joeseeph Gomez an associate of Co-Defendant WWE told Plaintiff allegedly Plaintiff was going to sign a contract at the next camp and Defendant McMahon was pleased with Plaintiffs work. The Plaintiff Brian P Jack respectfully believes the Court should know Defendant McMahon had access to the live wire feed and could view every training session live or taped that was pointed right at the first wrestling ring across from Co-Defendant Keirns office, and first of 3 rings as you enter to the right.

Defendant McMahon could have, and Plaintiff believes it was Defendant McMahons duty to remedy Plaintiffs Injuries immediately sending Plaintiff to Co-Defendant Dr. James Andrews, immediately after the wrestling ring malfunction that broke and mangled the Plaintiffs leg in mid-air that was captured on live camera feed, dislocating Plaintiffs knee joint, fracturing it, tearing full acl from the horn, MCL, and all Cartilage squished out of the joint, dislocating it for 4 months from the compression injury due to the malfunction and lack of maintenance on a 20 year old dilapidated ring. It hurt and injured Plaintiff Brian P Jack and was left to die on pain pills in Defendant WWE aka Santino Marella's home a.k.a Defendant Carelli.

The live camera that was pointed right at the ring that I was injured in, ran right to Defendant McMahon's Corporate Office live every day, Plaintiff would like video of his injury through discovery. The Defendant McMahon has had the Plaintiffs accident/injury on video and has had it since the minute Plaintiff was injured. Plaintiff Brian P Jack would respectfully request the record to reflect that should also be on record that Defendant McMahon is briefed on everyone and everything that happens every day in Defendant WWE daily operations. Plaintiff was allegedly told that Defendant McMahon was upset by Defendant

Anthony Carelli and Defendant John Lauraneitis. Plaintiff knows in good faith that the Defendant McMahon knew that Plaintiff Brian P Jack was injured but failed to render any medical assistance. Plaintiff believes Defendant McMahon knew Plaintiff was hurt, but failed to render any medical assistance, for 4 months. Plaintiff also believes Defendant McMahon was involved with the fraud to get Plaintiff to Dr. James Andrews, 2 years after injury in the WWE developmental ring and supposedly clear me to wrestle on a TV show called Tough Enough aired on USA network, where Plaintiff was offered a contract in writing for an opportunity at a \$1,000,000.00 (1 million dollars) contract was offered by Defendant, Shed Media US Inc. and partner Defendant WWE. Plaintiff believes the small print out of the near 50 page contract they gave Plaintiff on a Sat to sign by Sun with less than the required time by California Law to be looked at by Attorney of plaintiff's choice. Plaintiff believes in very good faith that the contractual efforts by the Defendants were performed out of fraud and deception, which released Defendant WWE of all liability before, during, and after the airing of the production had Plaintiff signed said contract. Meaning had Plaintiff signed, Plaintiff would have lost Plaintiff's civil rights as a victim to recuperate damages for injuries suffered at Defendant FCW and Defendant Steve Keirn's private torture chamber at said Defendants McMahon's developmental facility Defendant McMahon and other Co-Defendants not yet listed supervised from a live camera feed. Plaintiff believes in good faith Defendant McMahon knew about the fraudulent contract and the deception that led me to the contract that was rescinded when I spotted the fraud after being told WWE had nothing to do with the casting or Screening for the production. Plaintiff Brian P Jack was told in writing that Shed Media was going to have their own lawyer right up a new contract that Monday. It never happened. Plaintiff Brian P Jack has good faith knowledge that Defendant McMahon was aware of Plaintiffs situation from start to finish and caused great bodily harm to Plaintiff by not rendering medical service or delegating authority to get Plaintiff away from Defendant Keirn.

11. Defendant STEVE KEIRN (hereinafter "Defendant Keirn") Plaintiff respectfully request the right to amend if Plaintiff can have time to find a lawyer.

12. Defendant ANTHONY CARELLI (hereinafter "Defendant Carelli")

Plaintiff reserves the right to amend if Plaintiff can have time to find a lawyer.

13. Defendant DAVID OTUNGA (hereinafter “Defendant Otunga”) is a contracted employee of Defendant WWE and was in the Wrestling Ring when it malfunctioned which led to the damage to the plaintiffs body as the Defendant Otunga failed to render any type of medical aide whatsoever. The Defendant Otunga is said to have earned a law degree from Harvard.

14. Defendant TOM PRICHARD (hereinafter “Defendant Prichard”) was head trainer for Defendant FCW and Defendant WWE that failed to provide any medical assistance whatsoever.

15. Defendant JOHN LAURANEITIS (hereinafter “Defendant Lauraneitis”) is the VP of operations for the Defendant WWE and the mastermind of the fraud.

16. Defendant TY BAILEY (hereinafter “Defendant Bailey”) was in charge of talent relations when Plaintiff was placed at Defendant WWE and Defendant FCW developmental to train in an unsafe environment and then used fraud to deceive and hurt the Plaintiff.

17. Defendant VIRGIL RUNNELS (hereinafter “Defendant Runnels”) is a full time employee of Defendants FCW, WWE, NXT, and is in charge of Creative. Defendant Runnels failed to provide any type of medical assistance whatsoever

18. Defendant FLOYD GERALD BRISCO (hereinafter “Defendant Brisco”)

19. Defendant ROBERT REMIS (hereinafter “Defendant Remis”) Full time WWE agent that made Plaintiff a verbal guarantee he had plans for the Plaintiff after Defendant Remis critiqued Plaintiffs match at fraud camp in October of said year

20. Defendant PIERRE CLERMONT (hereinafter “Defendant Clermont”) Full Time WWE associate that critiqued Plaintiff luring him to Defendant Keirns private camp.

21. Defendant RICHARD BLOOD (hereinafter “Defendant Blood”) full time agent of Defendant WWE that gave orders at camp and communicated for months

without rendering any type of medical aide whatsoever.

22. Defendant NORMAN SMILEY (hereinafter "Defendant Smiley") full time trainer at Defendant NXT and Defendant FCW.

23. Defendant PETE GRUNER (hereinafter "Defendant Gruner") full time trainer at FCW

24. Defendant SCOTT AMANN (hereinafter "Defendant Amann") In House Counsil that used deception and cohesion to cause great bodily harm and mental anguish to Plaintiff

25. Defendant KRISTIN ALTMAN (hereinafter "Defendant Altman") is Talent Relations at Defendant WWE. Kristin sent me my itinerary for Defendant Andrews and fraudulent paperwork for Tough Enough Application. **See attached Exhibit 1.A and 1. AA**

25. Defendant DR. JAMES ANDREWS (hereinafter "Defendant Andrews") was the Dr's office I called in Florida and Alabama trying to beg for surgery. 2 years after my injury, was flown to Defendant Andrews office and was given an MRI, Defendant Andrew's office tried to run the Plaintiff Brian P Jack claim through POMCO fraudulently in writing on Monday November 29, 2010. As I was in the VIP room waiting for my MRI, Defendant Andrews came in and got a cup of coffee and acted like he didn't know who I was, when I told him I was from Appleton, WI, Defendant Andrews eyes got all big in shock like he knew people from my hometown. Allegedly the Plaintiff Brian P Jack thought right away, Matt Erickson, the Plaintiff's lifelong friend and teammate that is the Manager for the Milwaukee Brewers Single A Timber rattlers Farm team he may have known and or an Orthopedic shoulder specialist that interned with Defendant Andrews.

When Plaintiff Brian P Jack went in the examination room with Defendant Andrews, there was an intern, and a dark complected man that had his Drs tags on backwards and wouldn't speak, I was scared of him as soon as Defendant Andrews told me in front of these men, he had never heard of Co-Defendant Lauraneitis or Co-Defendant Bailey the two WWE Corporate that already were caught lying and placed Plaintiff Brian P Jack in harm's way by flying me to Defendant Andrews.

Co-Defendants WWE, Altman, Bailey and Lauraneitis that sent Plaintiff Brian P Jack to Defendant Andrews, and have sent hundreds of WWE athletes and entertainers, lied to the Plaintiff to harm him

Plaintiff Brian P Jacks college teammate and friend Shannon Myers from Lenoir-Rhyne was drafted by Don Shula for the Miami Dolphins. Shannon was the last athlete ever drafted by the great Don Shula. Shannon had surgery with and did his rehab next to WWE Rikishi and HHH, by the hands of Defendant Andrews.

The Plaintiff Brian P Jack had severe and still has legitimate concerns and anxiety stemming from a conversation when Plaintiff called Defendant Bailey and asked him why Defendant Andrews claimed he didn't know Co-Defendant Bailey when Co-Defendant Baileys father has been a long time NFL colleague and CEO for the Cowboys my other teammate from Junior College in Hutchinson, KS Jason Gamble played center for Clemson University then The Dallas cowboys at center and met Defendant Andrews while Co-Defendant Baileys father was working for the Dallas Cowboys and while Co-Defendant Baileys father is now on a long run with the Miami Dolphins as CEO. When Plaintiff allegedly confronted Co-Defendant Bailey about not knowing Defendant Andrews, Co-Defendant Baileys response was very cocky

“Who Jim?”

Plaintiff Brian P. Jack was then told by Defendant Bailey, “who do you think they will believe, you or Jim” I was in Wisconsin when I made that call for the record to Defendant Bailey who was fully employed by Defendant WWE, who was in CT at Defendant WWE corporate office.

Defendant Andrews MRI showed an injury that the male intern had to show the Plaintiff Brian P Jack as Defendant Andrews tapped on his forehead as if to tell me to use my head and he walked away angry after I told him about 50% of why I was hurting and what had happened to me by the hands and mouth of Co-Defendant Keirn and others. The intern told me Defendant Andrews was mad at WWE not me as he was showing me my MRI. While I was being processed at Defendant

Andrews office, the Plaintiff saw a guy pull a POMCO card out of a drawer and when I got home weeks later I got a bill in the mail that said Co-Defendant WWE's workman's comp carrier and Plaintiff's claim was denied by POMCO, that was an attempt at insurance fraud, again. Not by me, and the bills went to collections after Defendant WWE corporate flew me there. Plaintiff Brian P Jack still needs surgery that Dr. Andrews neglected to perform right when I was injured and then 2 years later, again.

I was so scared just to fly down there. I brought all of my paperwork to an attorney in Appleton, WI named Richard Kewley the Defendant's father's friend, I was afraid I was going to get hurt or killed on the so called Drs visit. So I confided with both firms and half a dozen Attorneys about my concerns as I showed them printed out Emails. They were just as shocked as I upon reading the trail of tears. (920) 734-2825

The Plaintiff Brian P Jack went to college to be a fish n wildlife officer. The Plaintiff studied Environmental Law and I have good instincts. Dr Andrews scared me with his straight out lies and antics, and he rubbed my back feeling for a wire in my opinion as we were walking down to the examination room, he also asked me if I wanted to work, or retire? And he tapped his temple at me saying no surgery.

All of the Plaintiffs emails to be attached as exhibits are chilling, as the paper trail tells a sad, but true story of a billion dollar publically traded company leaving Plaintiff hurt, mangled and injured. I could smell foul play before I got to Defendant Andrews who was supposedly going to clear me for Tough Enough Production on USA network, or in Co- Defendants Bailey and Lauraneitis own words, "well if you can't work will take it from there", which is a Jury question pertinent to my evidence. As well, there are many unanswered questions that need to be addressed and many genuine issues of fact for trial. **See Attached Exhibit 1. B**

The Plaintiff Brian P Jack communicated all of his concerns with former ADA from Appleton WI, Vincent Biskupic who ran for Attorney General in Wisconsin and is credible before and after Plaintiff Brian P Jack's trip to and from Defendant

Andrews. Vince Biskupic and Graeme Rattray, both Attorneys from Appleton, WI who tried to get me surgery through the Tampa Bay Bucs again, through his firm Hindshaw n Culbertson who had a sister office in Tampa. It fell through. I told Vincent how Defendant Andrews touched and rubbed my back, and Vince Biskupic finished my sentence “he thought you were wearing a wire” (920) 734-2300

28. Defendants named in the above THIRD AMENDED COMPLAINT above aforementioned and Ordered by this Court on January 23, 2014 to effect service of process on all Defendants. These are the names and identities of the parties presently known by the Plaintiff and/or whose liability to the Plaintiff is presently known, that they are employees, agents, trainers, supervisors, corporations, consultants, retained physician, representatives, co-ventures, masters, servants, partners, presently known to Plaintiff Brian P Jack, engaged in the activities and transactions referenced in this Complaint; and/or who were in some manner responsible for the injuries or damages to Plaintiff or who may otherwise be liable to Plaintiff based on the transactions described in this Complaint. The Plaintiff has made a good faith attempt to identify and continues to attempt to identify the true names and identities, capacities, acts and omissions of said Defendants prior and during the filing of this Complaint, and respectfully reserves the right to amend this Complaint with the Courts permission in the future should their identities, acts or new evidence be found as matter of fact and law.

29. At certain times hereinafter, all of the named defendants shall collectively be referred to as “Defendants” unless otherwise individually identified.

IV. CLAIMS ASSERTED

30. Plaintiff repeats, alleges and reincorporates by reference the allegations contained in paragraphs 1 through 11 above as though fully set forth herein.

31. On January 7, 2009, Defendants owned, operated maintained, utilized, serviced and was completely responsible for a wrestling ring used for training

wrestlers who were competing or set to compete at wrestling events held, managed, and/or operated by Defendant WWE and Defendant Keirn which was situated on the right private entrance on the premises known as Florida Championship Wrestling training facility which is located at 4535 South Dale Mabry Highway, Tampa, Florida 33611 (hereinafter, "Wrestling Ring").

32. On said date, Plaintiff was an experienced, professional wrestler who was an invitee and permitted on the wrestling Ring and at the location where the Wrestling Ring was kept by the Defendants.

33. On said date, Plaintiff was specifically required by the Defendants to train on the Wrestling Ring, despite the fact that there were two other fully functional training wrestling rings at the stated location.

34. At approximately 7: 30pm., while on the Wrestling Ring training a rookie wrestler matched up with the Plaintiff by the Defendants at their sole discretion, said Wrestling Ring did malfunction and shudderboard in sudden and horrible measure, jumping off its frame a board came up and hit the Plaintiff in mid-air, resulting in various serious injuries to Plaintiffs body, especially the horrendously painful breaking of Plaintiffs right knee.

35. At the time of the malfunction of the Wrestling Ring, there were 6 to 8 people in the Wrestling Ring.

36. Defendants failed and refused to render any kind of meaningful aid.

Defendants failed and refused to contact emergency personnel for the Plaintiff regarding his injuries as Bubba the Love Sponge was set to arrive in minutes and came in with his 2 children and they sat and stared at Plaintiff as bubba and his wife went into Keirns office, as Plaintiff sweat and vomit in pain. Defendant Keirn, at the time of the injury, confidentially advised the Plaintiff that unless he wanted to work as a wrestler with Defendant WWE, Plaintiff was not to call an ambulance or report the occurrence of the injury.

37. Plaintiff suffered fibia-tibia fractures and torn ACL torn from the horn of

the knee and other extensive injuries associated with the ring malfunction that remained unattended and left the Plaintiff, without means of medical remedy for nearly four months.

38. Plaintiff, alleges as additional causes of action against all defendants breach of contract; breach of the obligation of good faith and fair dealing; negligence/negligent misrepresentation; negligent supervision of employees/agents and authorized actors; intentional and negligent infliction of emotional distress; fraud; fraud in the inducement to contract; fraudulent misrepresentation; negligent maintenance of property conditions and premises liability; gross negligence; intentional interference with business opportunity; conversion of pecuniary interest; interference with contractual relationships.

V. DAMAGES SOUGHT

39. Plaintiff repeats, alleges and reincorporates by reference the allegations contained in paragraph 1 through 38 above as though fully set forth herein.

40. At the time of the incident, Defendants owed the Plaintiff a duty to provide safe training environment and to use reasonable care in the operation, direction, management, set-up, control, and supervision of the Wrestling Ring.

41. The Defendants, with gross negligence, breached their duty of reasonable care owed to plaintiff. Such gross negligence includes, but is not limited to: (a) Failure to insure appropriate coordination and supervision of the Wrestling Ring (b) Failure to conduct adequate inspections of the Wrestling Ring to insure it was safe for use by all invitees; (c) Failure to manage the number of people that should be on the Wrestling Ring at a time, especially considering that only the Defendants were privy to the Wrestling ring's compromised condition; (d) Allowing an adequate dangerous structure, the Wrestling Ring, to be used at the sublect training facility; € Allowing for the wrestling ring to be overloaded or overly occupied beyond reasonable engineering tolerances that the defendants, in their ownership, management, and operation of the Wrestling Ring, were well within theoir knowledge to exclusively understand: (f) failure and refusal to have reasonable and

adequate emergency response plans to deal with wrestling ring malfunctions and collapse; and (G) Failure to appropriately notify all invitees, including the plaintiff, of the harmful and dangerous condition of the Wrestling Ring before permitting its use.

42. As a direct and proximate result of Defendants' gross failure to exercise reasonable care regarding the ownership, maintenance, use, and operation of the Wrestling Ring which caused the subject collapse and malfunction of the same, as well as Defendants' gross failure and refusal to allow the plaintiff to receive medical evaluation and assistance for his injuries.

Plaintiff is entitled to damages for past and future medical and hospital expenses, mental anguish, emotional distress, past and future lost wages, loss of earning capacity as a professional wrestler, temporary and permanent injuries, pain and suffering, loss of ability to earn money, permanent disfigurement and scarring, loss of enjoyment of life, pre- and post-judgment legal interest, punitive damages, and all other damages as provided by Florida law.

WHEREFORWE, Plaintiff demands judgment against Defendants, individually and collectively, in an amount which exceeds the jurisdictional requirements of this Court, plus interest, litigation cost and expenses as will be proven at trial, and further demands such other and further relief as this Court may deem just, proper and equitable.

VI. RELIEF SOUGHT

WHEREFORE, Plaintiff BRIAN P. JACK respectfully requests that this Court grant judgment in his favor against aforementioned Defendants, individually and collectively, as follows:

- a) General damages in an amount to be proven at trial:

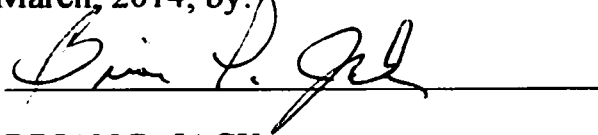
- b) Compensatory damages in an amount to be proven at trial;
- e) Punitive damages in an amount to be proven at trial:
- d) Litigation costs and expenses incurred by plaintiff reasonably associated with the prosecution of this case, as well as pre-judgment interest and post-judgment interest and
- e) An award of such other and further relief as the above-entitled Court deems equitable and just under the circumstances and allowable under applicable laws.

VII. DEMAND FOR JURY TRIAL

COME NOW BRIAN P. JACK, Plaintiff in the above entitled action, as party pro se, and hereby respectfully demands a trial by jury of all issues.

Respectfully filed on this, 19th day of

March, 2014, by:

A handwritten signature in black ink, appearing to read "Brian P. Jack", is written over a horizontal line.

BRIAN P. JACK

Plaintiff Pro Se

E 9036 County Hwy X

New London, WI 54961

Exhibit 1. A**RE: Dr. Andrews**

Thu December 2, 2010 3:48:30 PM

From: "Altman, Kristin" <Kristin.Altman@wwecorp.com> View Contact
 To: Brian Jack <brianjack@yahoo.com>

Hi Brian -

You may email everything over to me. Or if you prefer fax, the number is 203-353-2802

Thanks,
 Kristin

From: Brian Jack (mailto:brianjack@yahoo.com)
 Sent: Thursday, December 02, 2010 4:14 PM
 To: Altman, Kristin
 Subject: Re: Dr. Andrews

Hi Kristin. I have been told to send my bills to Erica? the bills from my last surgery. Would you happen to have her email contact or direct line please? If i understood correctly she has been sick for two weeks. I hope she feels better. I may have heard her name wrong. im not sure. Thank you for your time.
 Respectfully, Brian Jack

From: "Altman, Kristin" <Kristin.Altman@wwecorp.com>
 To: Brian Jack <brianjack@yahoo.com>
 Sent: Wed, November 24, 2010 1:57:28 PM
 Subject: RE: Dr. Andrews

Hi Brian -

My mistake, the forms are attached now... his number is 203.939.3699.

Thanks,
 Kristin

From: Brian Jack (mailto:brianjack@yahoo.com)
 Sent: Wednesday, November 24, 2010 2:56 PM
 To: Altman, Kristin
 Subject: Re: Dr. Andrews

Hi Kristin, you mentioned on the phone something about a standard questionnaire from Dr. Andrews. I have received the link for the travel, however, I have not yet received any standard questionnaire from Dr Andrews I thought you were going to send as well, so i could print it off and fill it out as discussed, otherwise, I am ready for this. I was going to call Dr Andrews to confirm, if you could please pass the number along, all I have is Dr Andrews fax number that you gave me. Thank you for your time and help. Respectfully, Brian Patrick Jack

From: "Altman, Kristin" <Kristin.Altman@wwecorp.com>
 To: brianjack@yahoo.com
 Sent: Tue, November 23, 2010 4:58:54 PM
 Subject: Dr. Andrews

Hi Brian,

The link below has your travel for Monday, November 29th. Butch (Dr. Andrew's driver) will pick you up from the airport. He will be in a white SUV parked outside of baggage claim where the buses and limos park.

When you arrive to Andrews Sports Medicine, you will first get an MRI done with radiology. Then, you will go up to be evaluated by Dr. Andrews.

Please give me a call at 203-554-7983 if you have any questions. Also, please respond so I know you are all set.

Thanks,
 Kristin

From: YOUR SABRE CONNECTED TRAVEL CONSULTANT (mailto:agency_email_unknown@sabre.com)
 Sent: Monday, November 22, 2010 5:12 PM
 To: Fischer, Holly
 Subject: Travel Reservation November 29 for JACK

Your Travel Arranger is pleased to deliver your complete travel itinerary through Sabre® Virtually There®.

[Click here to access your reservation on the web or a mobile device.](#)

Virtually There® allows you to review or print your reservations, as well as:

- Register for trip reminders and cancellation/delay notifications
- View maps & driving directions
- Review city guides & restaurant recommendations
- Get up-to-date weather and much more!

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Exhibit 1. AA

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meghan Barry

Search Mail Search Web

Brian

Compose

Inbox (9999+)

Drafts (101)

Sent

Spam (1160)

Trash (12)

Folders

Recent

Search results

holy shit it worked! Meghan telling me I had to erase that I was cas...

Me

Nov 6, 2013

To mark@mmlegohelp.org

Conversation started January 28, 2011

1/28, 5:22pm

Expand

Show Images

Brian Jack

Its very nice to put your face to your voice. Thanks for fighting for me Meg. I left you a message today.... not trying to be a pest..... but its getting cold here and its going to snow..... I could use some sunshine and want to get in the ring, bad. Tom Petty said one time in his song..... The wait..... its the hardest part. lol Its killin me..... Thanks so much for the time that you have given me. I really look forward to meeting you. Respectfully Bj

January 28, 2011

1/28, 10:32pm

Expand

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Meghan Barry

Hey Brian!!!! I am super super excited for you but you have to take that down on of your facebook page. Ok? People are not supposed to be knowing that you are coming, other then close family and stuff. Thank you soo much and can't wait to meet you!!

Meg

1/28, 10:45pm

Expand

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Brian Jack

Ok Meg. I will erase my facebook posts as you wish lol. Respectfully bj

1/28, 10:46pm

Expand

Show Images

Meghan Barry

Thank you and I will talk to you on Monday!!!

1/28, 11:01pm

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Brian Jack

I was taken off guard a bit that the call i got wasnt from you. I still havent opened the documents that were sent. I would hope you can call me sometime before I send those documents back signed after i read them.....either this weekend if you find the time or on monday, just due to some of the questions you asked, I talked about and my dog and stuff. What am I supposed to tell a psychologist that isnt going to freak them out. Nobody wants to hear about dogs being murdered and stuff, I have seen the best of the best, nobody wants to hear about it. I have every single document and court record as well as audio and video tapes. 2 witnesses full

https://us-mg6.mail.yahoo.com/neo/launch?.rand=7en5an50m56e 3/19/2014

Exhibit 1.B

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Kristin Altman (Kristin.Altman@wwecorp.com) Search Mail Search Web Brian

Compose

Inbox (9999+)
Drafts (101)
Sent
Spam (1142)
Trash (6)
> Folders
> Recent

Search results

Fw: no news

Me
To mark@mmlegalhelp.org

Nov 6, 2013

Forwarded Message

From: "Bailey, Ty" <Ty.Bailey@wwecorp.com>
To: Brian Jack <brianpjack@yahoo.com>; "Altman, Kristin" <Kristin.Altman@wwecorp.com>
Sent: Thursday, February 10, 2011 5:15 PM
Subject: RE: no news

Brian,

I will call you next week. We just got your bills. We need to examine them. It takes time.

Ty

From: Brian Jack [mailto:brianpjack@yahoo.com]
Sent: Thursday, February 10, 2011 5:05 PM
To: Altman, Kristin
Cc: Bailey, Ty
Subject: no news

I havent heard from you or Ty, as was told and promised to to me, can you please keep your words and tell me what is going on? with my medical bills and what steps you are taking as we discussed, or at least what the next step is. Respectfully Brian P Jack

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Exhibit 1.B

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Kristin Altman (Kristin.Altman@wwecorp.com)

Search Mail

Search Web

Brian



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Inbox (999+)

Drafts (101)

Sent

Spam (1142)

Trash (6)

Folders

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Fw: no news

Me

Nov 6, 2013

To: mark@mmlegalhelp.org

— Forwarded Message —

From: "Bailey, Ty" <Ty.Bailey@wwecorp.com>

To: Brian Jack <brianpjack@yahoo.com>; "Altman, Kristin"

<Kristin.Altman@wwecorp.com>

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