

DN X05 CV-00-0180933s	:	SUPERIOR COURT

STANLEY SHENKER & ASSOCIATES, INC.,	:	COMPLEX LITIGATION
Plaintiff	:	DOCKET
vs.	:	AT STAMFORD
WORLD WRESTLING FEDERATION	:	JANUARY 29, 2002
ENTERTAINMENT, INC.,	:	
Defendant	:	

**PLAINTIFF'S RESPONSES TO DEFENDANT'S THIRD SET OF
INTERROGATORIES AND SECOND REQUEST FOR
PRODUCTION OF DOCUMENTS DIRECTED TO PLAINTIFF**

Plaintiff Stanley Shenker & Associates, Inc. ("SSAI"), pursuant to Practice Book Sections 13-8 and 13-10(b), hereby responds to Defendant, World Wrestling Federation Entertainment, Inc.'s ("WWFE"), Third Set of Interrogatories and Second Request for Production of Documents dated November 26, 20001.

INTERROGATORIES

1. Has SSAI or Shenker, or anyone acting on behalf of SSAI or Shenker, ever solicited, requested and/or demanded any type of payment, including, but not limited to, any consulting fees, service fees, commissions, gifts, checks, cash or any other type of payment, from any WWFE Licensee?

RESPONSE: Subject to previously stated objections, none known as to any transactions

LAW OFFICES
OF
SEY & GRECO, LLP
905 • (203) 425-4200 • JURIS NO. 401577
SANDAK FRIEDMAN
STAMFORD, CONN.
970 SUMMER STREET

related to WWFE. In 1999 or 1998, Stanley Shenker received approximately \$35,000 in payment from Trinity Products on a separate oral consulting agreement. After a thorough search of his documents, Mr. Shenker has been unable to locate any existing documents pertaining to this transaction. To the extent that any documents are subsequently located they will be produced.

2. If your answer to Interrogatory No. 1 is yes, please provide the following information:

- (a) the date on which each solicitation, request or demand occurred;
- (b) the place where each solicitation, request or demand occurred;
- (c) to whom each solicitation, request or demand was made;
- (d) who made each solicitation, request or demand;
- (e) the amount of each solicitation, request or demand;
- (f) the purpose or nature of each solicitation, request or demand; and
- (g) the response of the person or persons to whom each solicitation, request or demand was made.

RESPONSE: See Response to Interrogatory No. 1.

3. Has SSAI or Shenker, or anyone acting on behalf of SSAI or Shenker, ever solicited, requested and/or demanded any type of payment, including, but not limited to, any consulting fees, service fees, commissions, gifts, checks, cash or any other type of payment, from

any Potential WWFE Licensee?

RESPONSE: See Response to Interrogatory No. 1.

4. If you answer to Interrogatory No. 3 is yes, please provide the following information:

- (a) the date on which each solicitation, request or demand occurred;
- (b) the place where each solicitation, request or demand occurred;
- (c) to whom each solicitation, request or demand was made;
- (d) who made each solicitation, request or demand;
- (e) the amount of each solicitation, request or demand;
- (f) the purpose or nature of each solicitation, request or demand; and
- (g) the response of the person or persons to whom each solicitation, request or demand was made.

RESPONSE: See Response to Interrogatory No. 1.

5. Has SSAI or Shenker, or anyone acting on behalf of SSAI or Shenker, ever received any type of payment, including, but not limited to, any consulting fees, service fees, commissions, gifts, checks, cash or any other type of payment, from any WWFE Licensee?

RESPONSE: See Response to Interrogatory No. 1.

6. If your answer to Interrogatory No. 5 is yes, please provide the following information:

- (a) the date on which each solicitation, request or demand occurred;
- (b) the place where each solicitation, request or demand occurred;
- (c) to whom each solicitation, request or demand was made;
- (d) who made each solicitation, request or demand;
- (e) the amount of each solicitation, request or demand;
- (f) the purpose or nature of each solicitation, request or demand; and
- (g) the response of the person or persons to whom each solicitation, request or demand was made.

RESPONSE: See Response to Interrogatory No. 1.

7. Has SSAI or Shenker, or anyone acting on behalf of SSAI or Shenker, ever received any type of payment, including, but not limited to, any consulting fees, service fees, commissions, gifts, checks, cash or any other type of payment, from any Potential WWFE Licensee?

RESPONSE: See Response to Interrogatory No. 1.

8. If your answer to Interrogatory No. 7 is yes, please provide the following information:

- (a) the date on which each solicitation , request or demand occurred;
- (b) the place where each solicitation, request or demand occurred;
- (c) to whom each solicitation, request or demand was made;
- (d) who made each solicitation, request or demand;
- (e) the amount of each solicitation, request or demand;
- (f) the purpose or nature of each solicitation, request or demand; and
- (g) the response of the person or persons to whom each solicitation, request or demand was made.

RESPONSE: See Response to Interrogatory No. 1.

REQUEST FOR PRODUCTION OF DOCUMENTS

Produce documents responsive to the following paragraph:

1. All documents that refer to or relate in any way to the solicitation, request or demand of any type of payment, including, but not limited to, any consulting fees, service fees, commissions, gifts, checks, cash or any other type of payment, from any WWFE Licensee.

RESPONSE: See Response to Interrogatory No. 1.

2. All documents that refer or relate in any way to the solicitation, request or demand of any type of payment, including, but not limited to, any consulting fees, service fees, commissions, gifts, checks, cash or any other type of payment, from any Potential WWFE Licensee.

RESPONSE: See Response to Interrogatory No. 1.

3. All documents that refer or relate in any way to the receipt of any type of payment, including, but not limited to, any consulting fees, service fees, commissions, gifts, checks, cash or any other type of payment, from any WWFE Licensee.

RESPONSE: See Response to Interrogatory No. 1.

4. All documents that refer or relate in any way to the receipt of any type of payment, including, but not limited to, any consulting fees, service fees, commissions, gifts, checks, cash or any other type of payment, from any Potential WWFE Licensee.

RESPONSE: See Response to Interrogatory No. 1.

**PLAINTIFF, STANLEY SHENKER &
ASSOCIATES, INC.,**

By 

Peter M. Nolin

Sandak Friedman Hennessey & Greco

970 Summer Street

Stamford, CT 06905

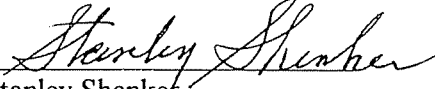
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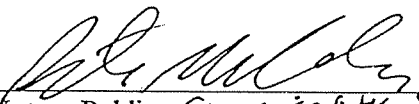
VERIFICATION

I hereby certify that I have reviewed the above Interrogatories and responses thereto and that they are true and accurate, to the best of my knowledge, information and belief.


Stanley Shenker

Subscribed and sworn to before me

this 29th day of January, 2002


Notary Public *Commiss. Govt Superior Court*

LAI
SANDAK FRIEDMAN
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CERTIFICATION

This is to certify that a copy of the foregoing has been mailed, postage prepaid, this 24th day of January, 2002, to:

Mary A. Gambardella, Esq.
Epstein Becker & Green, P.C.
One Landmark Square- Suite 1800
Stamford CT 06901-2601

and by Federal Express to:

Mark A. Rush, Esq. (Pro Hac Vice)
Mark D. Feczko, Esq. (Pro Hac Vice)
Jerry S. McDevitt, Esq. (Pro Hac Vice)
Kirkpatrick & Lockhart, LLP
Henry W. Oliver Building
535 Smithfield Street
Pittsburgh, PA 15222


Peter M. Nolin