

DN X05 CV-00-0180933s	:	SUPERIOR COURT

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

PLAINTIFF'S AMENDED 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 amends its responses to Defendant, World Wrestling Federation Entertainment, Inc.'s ("WWFE"), Third Set of Interrogatories and Second Request for Production of Documents dated November 26, 2001.

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 WWFE licenses

SANDAK FRIEDMAN TENNESSETT & GIBCO, LLP
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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: N/A.

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: Subject to previously stated objections, none known as to WWFE licenses.

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: N/A.

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: Subject to previously stated objections, none known as to any transactions related to WWFE. However, during the March 20, 2002 good faith teleconference, opposing counsel requested that Mr. Shenker and/or SSAI update its response to this interrogatory to include a transaction unrelated to WWFE that involved Trinity Products, Inc. Although Mr. Shenker cannot recall all the details of the transaction with Trinity for which WWFE is requesting information, he amends his response as follows:

Trinity Products: In 1998 or 1999, Stanley Shenker or SSAI received payment from Trinity Products on a separate oral consulting agreement. After a thorough search of his

documents, Mr. Shenker has been unable to locate documents that pertain to this transaction other than documents bates stamped Confidential SSAI 09850, Confidential Suchoff 002698 and check register Confidential SSAI 10174 that appear to reflect payments to SSAI from Trinity Products. With the passage of time, Mr. Shenker cannot accurately recall the exact details of the Trinity Products transaction. However, as he recollects, Mr. Goetz, President of Trinity Products, a then existing WWFE licensee, contacted Mr. Shenker to ask for his assistance in pursuing possible tee-shirt deals with various companies, other than WWFE, with which Mr. Shenker had contacts. Mr. Shenker believes he made calls on behalf of Trinity, including calls to the National Basketball Association, the World Wild Life Fund, the National Wildlife Conservatory and possibly WalMart on Mr. Goetz's behalf. Mr. Shenker does not believe there was any written contract. He recalls receiving two payments but that there was some confusion as to how one payment was addressed. To the extent that any documents are subsequently located they will be produced

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;

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- (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: Subject to previously stated objections, see Response to Interrogatory No. 5.

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: Subject to previously stated objections, see Response to Interrogatory No. 5.

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: N/A.

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: SSAI has produced all documents relating to the payment by Trinity Products to the extent they exist and have been located. SSAI will produce responsive documents it subsequently discovers.

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

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RESPONSE: SSAI submits that it has produced all responsive documents to the extent they exist and have been located. SSAI will produce responsive documents it subsequently discovers.

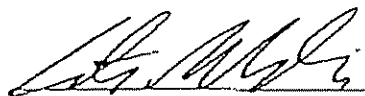
3 All documents that refer or relate in any way to the receipt of any type of payment, including, but not limited to, any consulting fees, service fees, commissions, gifts, checks, cash or any other type of payment, from any WWFE Licensee.

RESPONSE: SSAI submits that it has produced all responsive documents to the extent they exist and have been located. SSAI will produce responsive documents it subsequently discovers.

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: SSAI hereby objects to this request in that it is vague and overly broad. SSAI further objects to this request in that it seeks information that is neither relevant nor material and not calculated to lead to the discovery of admissible evidence.

PLAINTIFF, STANLEY SHENKER & ASSOCIATES, INC.,

By 
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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 May, 2002


Notary Public
Commissioner Superior Court

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ORDER

The foregoing objections having been duly considered are hereby ORDERED

- 1. Objection to Interrogatory No. 1 is hereby SUSTAINED/OVERRULED.
- 2. Objection to Interrogatory No. 2 is hereby SUSTAINED/OVERRULED.
- 3. Objection to Interrogatory No. 3 is hereby SUSTAINED/OVERRULED.
- 4. Objection to Interrogatory No. 4 is hereby SUSTAINED/OVERRULED.
- 5. Objection to Interrogatory No. 5 is hereby SUSTAINED/OVERRULED.
- 6. Objection to Interrogatory No. 6 is hereby SUSTAINED/OVERRULED.
- 7. Objection to Interrogatory No. 7 is hereby SUSTAINED/OVERRULED.
- 8. Objection to Interrogatory No. 8 is hereby SUSTAINED/OVERRULED.

- 9. Objection to Request No. 4 is hereby SUSTAINED/OVERRULED.

Dated at _____ on this _____ day of _____ 2002.

Judge/Clerk

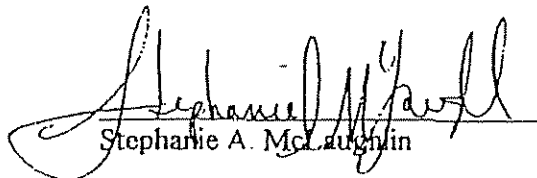
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CERTIFICATION

This is to certify that a copy of the foregoing has been faxed and mailed, postage prepaid, this 29th day of May, 2002, to:

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