

# EXHIBIT A

**FILED**

IN THE CIRCUIT COURT OF SHELBY COUNTY, TENNESSEE **DEC 31 2007**

COREY MACLIN,

CIRCUIT CLERK  
BY *[Signature]* DC

Plaintiff,

v.

No. CF-006368-07  
DIV VII

WORLD WRESTLING ENTERTAINMENT,  
INC., AND VINCENT MCMAHON,

JURY DEMANDED

Defendants.

**COMPLAINT FOR MONEY DAMAGES**

Comes now your Plaintiff, Corey Maclin, and files this lawsuit against World Wrestling Entertainment, Inc. (hereinafter "WWE") and Vince McMahon. In support of the Complaint, the Plaintiff would state as follows:

1. Corey Maclin is an adult resident and citizen of Memphis, Shelby County, Tennessee. He operates in the business among other things promoting professional wrestling shows for entertainment for the public. In that capacity, Corey Maclin does business as Corey Maclin and Associates.
2. Upon information and belief, World Wrestling Entertainment, Inc. is a Delaware Corporation located in Connecticut which is registered to do business in the State of Tennessee. It can be served through process through CT Corporation, 800 S. Gay Street, Suite 2021, Knoxville, TN, 37929-9710.
3. Upon information and belief, Vincent McMahon is an adult resident and citizen of the State of Connecticut. Mr. McMahon is the President and CEO of World Wrestling Entertainment, Inc. and can be served at 1241 E. Main Street in Stamford, Connecticut, 06902.

4. Both Mr. McMahon and World Wrestling Entertainment, Inc. ("WWE") avail themselves of the privileges of doing business in the State of Tennessee and in Shelby County.
5. Because the events complained of in this Complaint look place in Memphis, Shelby County, Tennessee jurisdiction and venue are proper before this Honorable Court.
6. On April 27, 2007, Plaintiff Corey Maclin intended to promote a wrestling show involving wrestlers known as Hulk Hogan and Jerry "The King" Lawler. Because both of these wrestlers were enormous draws for the industry, this wrestling promotion was expected to be enormously successful. Because Hulk Hogan had wrestled his first match against Jerry Lawler in Memphis, Shelby County, Tennessee, this added to the excitement of the promotion and allowed for the possibility and expectation that this show on April 27, 2007 would not be the last confrontation between these two wrestlers. Thus, the expectation of profit was even more substantial than what would have been derived only from the April 27, 2007.
7. On or about the week of April 9, 2007, upon information and belief and based upon eyewitness statements, either Vincent McMahon or another agent of WWE, contacted Jerry Lawler and told him that he could not participate or if he choose to wrestle in this show he would no longer work for WWE; a job that he currently held among other things as an announcer for their weekly show.

8. At that time, both Lawler and Hogan had agreed to the wrestling match and were under contract. Plaintiff had all ready extended significant money and effort on the project.
9. Upon information and belief and based upon efforts at due diligence, Lawler does not have any exclusive contract with WWE to perform exclusively for the Defendants.
10. Based upon the extreme pressure placed upon Lawler by the WWE and or its agents, Lawler withdrew from the wrestling promotion show on August 27, 2007. As a result of the withdrawal, Plaintiff suffered significant damages including loss of ticket sales, expenses, in redoing the marketing and other preprinted items for the show and loss of expectation of future shows. In addition to forcing Lawler out of the show, WWE also simultaneously withdrew wrestlers under its employec or wrestlers that it had a great deal of influence with and other local promotions causing the Plaintiff to lose a weekly wrestling promotion at Sam's Town Casino.
11. It is believed among other things that WWE or its agent or Vincent McMahon took these actions because of a long running feud with Hogan and in an effort to continue its extensive market control of the wrestling market by not allowing Maclin, a competing promoter, to have a successful and popular promotion.
12. Plaintiff alleges that the Defendants knew of the existing contract between Plaintiff and Lawler as well as the existing contract Plaintiff had with Sam's Town; and that these Defendants intended to cause a breach of that contract

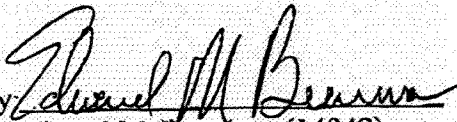
for the wrestling promotions based upon an improper motive, malice, and means i.e. its undue influence in the market and with these individuals. As a result, Plaintiff suffered injuries and damages in an amount to be proved at trial.

13. Thus, Plaintiff brings a cause of action against these Defendants for tortuous interference with a contract and intentional interference with a business relationship.
14. Plaintiff further alleges that WWE controls the wrestling promotion market in the United States of American and thus monopolizes that market by its control of wrestlers and its financial control of those it does not have under contract. By its actions with Lawler and Hogan and by pulling other wrestlers from promotions that it knew were scheduled, WWE has violated the Sherman Anti-Trust Act Section 2 and is guilty of restraint of trade and as well as violations of the Tennessee Consumer Protections Act.
15. Furthermore, these actions were done intentionally and with malice. Therefore, Plaintiff asserts that he is entitled to punitive damages and all additional damages allowed under these common law causes of action and statutes.

**WHEREFORE PREMISES CONSIDERED PLAINTIFF RESPECTFULLY  
PRAYS THAT THIS HONORABLE COURT:**

1. Empanel a jury to hear the cause;
2. Render a judgment in an amount to be proven at trial; and
3. Any other such further relief as the court may deem proper and necessary.

Respectfully Submitted,

By: 

Edward M. Bearman (14242)  
780 Ridge Lake Blvd.  
Suite 202  
Memphis, TN 38120



(CHANCERY/CIRCUIT) COURT OF TENNESSEE  
140 ADAMS AVENUE MEMPHIS, TENNESSEE 38103  
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS

SUMMONS IN CIVIL ACTION

NO. CF-002368-07 AD DAMNUM \$ \_\_\_\_\_ AUTO  OTHER   
COREY MACLIN \_\_\_\_\_  
Home Address

vs. PLAINTIFF  
WORLD WRESTLING ENTERTAINMENT, INC. \_\_\_\_\_  
AND VINCENT MCMAHON \_\_\_\_\_  
Business Address  
Home Address  
Business Address

DEFENDANT  
TO THE DEFENDANT(S): PLEASE SERVE THROUGH THE SECRETARY OF STATE:  
Vincent McMahon, World Wrestling Entertainment, Inc.  
1241 East Main Street, Stamford, CT 06902-3520

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and serving a copy of your answer to the Complaint on EDWARD M. BEARMAN Plaintiff's attorney, whose address is 780 Ridge Lake Blvd., Ste 202 Memphis, TN 38120, telephone (901) 682-3450 within THIRTY (30) DAYS after this summons has been served upon you, not including the day of service. If you fail to do so, a judgment by default may be taken against you for the relief demanded in the Complaint.

JIMMY MOORE, Clerk  
KENNY ARMSTRONG, Clerk & Master  
By Bonnie Schlichter D.C.

TESTED AND ISSUED 12-31, 2007  
TO THE DEFENDANT(S):

NOTICE: Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice: Tennessee law provides a four thousand dollar (\$4,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

COST BOND

I hereby acknowledge and bind myself for the prosecution of this action and payment of all costs not to exceed \$500.00 in this court which may at any time be adjudged against the plaintiff in the event said plaintiff shall not pay the same.

Witness My Hand this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_  
Certification when applicable

I, KENNY ARMSTRONG, Clerk & Master of the Chancery Court, Shelby County, Tennessee, certify this to be a true and accurate copy as filed this \_\_\_\_\_  
KENNY ARMSTRONG, Clerk & Master

By: \_\_\_\_\_, D.C.

I, JIMMY MOORE, Clerk of the Circuit Court, Shelby County, Tennessee, certify this to be a true and accurate copy as filed this 12-31-07  
JIMMY MOORE, Clerk

By: Bonnie Schlichter D.C.

SECRETARY OF REVENUE  
2007-12-31 7:11 AM

RETURN ON SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I HAVE SERVED THE WITHIN SUMMONS:

By delivering on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ M. a copy of the summons and a copy of the Complaint to the following defendants

Mark Luttrell, Sheriff

By \_\_\_\_\_ Deputy Sheriff

PRIVATE PROCESS SERVER

I HEREBY CERTIFY THAT I HAVE SERVED THE WITHIN SUMMONS:

By delivering on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ M. a copy of the summons and a copy of the Complaint to the following defendants

(PLEASE PRINT THE FOLLOWING)

Private Process Server

Address

Phone

Company

Signature

Other manner of service:

I hereby certify that I have NOT served this Summons on the within named defendant(s) \_\_\_\_\_

because \_\_\_\_\_ is / are not to be found in this County for the following reason(s): \_\_\_\_\_

Mark Luttrell, Sheriff

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ By \_\_\_\_\_ Deputy Sheriff

CV-08-6368-DIV III

IN THE (CLERK/CIRCUIT) COURT OF TENNESSEE FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS

SUMMONS IN CIVIL ACTIONS

Jorey MacLin PLAINTIFF

vs. World Wrestling Entertainment, Inc et al DEFENDANT

Came to hand

Edward Bearman Attorney for Plaintiff 14242

Tel. No 901 682-3450



01/30/2008 14:54 FAX 203 353 0236

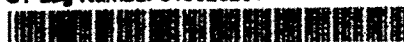
WWE LEGAL AFFAIRS

002/009

**CT CORPORATION**  
A Wolcott/Flower Company

**Service of Process  
Transmittal**

01/29/2008  
CT Log Number 513026201



**TO:** Cathy Neville  
World Wrestling Entertainment, Inc.  
1241 East Main Street  
Stamford, CT 06902

FEB 1 2008

**RE:** Process Served in Tennessee

JAN 30 2008

**FOR:** World Wrestling Entertainment, Inc. (Domestic State: DE)

**ED KAUFMAN**

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

|                                    |  |
|------------------------------------|--|
| <b>TITLE OF ACTION:</b>            | Corey Maclin, Pff. vs. World Wrestling Entertainment, Inc. and Vincent McMahon, Dfts.  |
| <b>DOCUMENT(S) SERVED:</b>         | Summons, Complaint   |
| <b>COURT/AGENCY:</b>               | Shelby County Circuit Court, TN<br>Case # CT00636807   |
| <b>NATURE OF ACTION:</b>           | Dfts. intended to cause a breach of contract for wrestling promotions based upon improper motive, malice and means including undue influence in the market |
| <b>ON WHOM PROCESS WAS SERVED:</b> | C T Corporation System, Knoxville, TN  |
| <b>DATE AND HOUR OF SERVICE:</b>   | By Process Server on 01/29/2008 at 09:00   |
| <b>APPEARANCE OR ANSWER DUE:</b>   | Within 30 days after the summons has been served upon you, not including the day of service  |
| <b>ATTORNEY(S) / SENDER(S):</b>    | Edward M. Bearman<br>780 Ridge Lake Blvd.<br>Suite 202<br>Memphis, TN 38120<br>901-682-3450  |
| <b>ACTION ITEM(S):</b>             | SOP Papers with Transmittal, via Fed Ex 2 Day , 790926993200<br>Image SOP - Page(s): 7   |
| <b>SIGNED:</b>                     | C T Corporation System   |
| <b>ADDRESS:</b>                    | 800 S. Gay Street<br>Suite 0221<br>Knoxville, TN 37929-9710  |
| <b>TELEPHONE:</b>                  | 865-342-3522   |

Page 1 of 1 / EF

Information displayed on this transmittal is for CT Corporation's record keeping purposes only and is provided to the recipient for quick reference. This information does not constitute a legal opinion as to the nature of action, the amount of damages, the answer date, or any information contained in the documents themselves. Recipient is responsible for interpreting said documents and for taking appropriate action. Signatures on certified mail receipts confirm receipt of package only, not contents.

01/30/2008 14:54 FAX 203 353 0236

WWE LEGAL AFFAIRS

003/009

**(CHANCERY/CIRCUIT) COURT OF TENNESSEE  
140 ADAMS AVENUE MEMPHIS, TENNESSEE 38103  
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS**

**SUMMONS IN CIVIL ACTION**

NO. CT 006368-07 AD DAMNUM \$ \_\_\_\_\_ AUTO  OTHER   
COREY MACLIN \_\_\_\_\_  
\_\_\_\_\_ Home Address

vs. PLAINTIFF \_\_\_\_\_ Business Address  
WORLD WRESTLING ENTERTAINMENT, INC. \_\_\_\_\_  
AND VINCENT MCMAHON \_\_\_\_\_ Home Address

DEFENDANT \_\_\_\_\_ Business Address

TO THE DEFENDANT(S): PLEASE SERVE WORLD WRESTLING ENTERTAINMENT, INC. THROUGH THE SHERIFF OF KNOX COUNTY:

CT CORPORATION SYSTEMS, 800 S. GAY STREET, SUITE 2021, KNOXVILLE, TN 37929

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and serving a copy of your answer to the Complaint on EDWARD M. BEARMAN Plaintiff's attorney, whose address is 780 Ridge Lake Blvd., Ste 202 Memphis, TN 38120, telephone (901) 682-3450 within **THIRTY (30) DAYS** after this summons has been served upon you, not including the day of service. If you fail to do so, a judgment by default may be taken against you for the relief demanded in the Complaint.

JIMMY MOORE, Clerk  
~~KENNY ARMSTRONG, Clerk & Master~~  
By [Signature], D.C.

TESTED AND ISSUED: 12-31, 2007

TO THE DEFENDANT(S):

NOTICE: Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice: Tennessee law provides a four thousand dollar (\$4,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

**COST BOND**

I hereby acknowledge and bind myself for the prosecution of this action and payment of all costs not to exceed \$500.00 in this court which may at any time be adjudged against the plaintiff in the event said plaintiff shall not pay the same.

Witness My Hand this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_

Certification when applicable

I, KENNY ARMSTRONG, Clerk & Master of the Chancery Court, Shelby County, Tennessee, certify this to be a true and accurate copy as filed this \_\_\_\_\_  
KENNY ARMSTRONG, Clerk & Master

Surety  
I, JIMMY MOORE, Clerk of the Circuit Court, Shelby County, Tennessee, certify this to be a true and accurate copy as filed this \_\_\_\_\_  
JIMMY MOORE, Clerk

By: \_\_\_\_\_, D.C. By: \_\_\_\_\_, D.C.

01/30/2008 14:55 FAX 203 353 0236

WWE LEGAL AFFAIRS

004/009

RETURN ON SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I HAVE SERVED THE WITHIN SUMMONS:

By delivering on the 29 day of Jan, 20 08 at 9:00 A.M.

a copy of the summons and a copy of the Complaint to the following defendants

World Wrestling Entertainment, Inc.

Served Special Assistant Secretary for Service of Process to C.T. Corporation System, the Registered Agent for

Mark Luttrell, Sheriff

By

Jack Dixon Deputy Sheriff

PRIVATE PROCESS SERVER

I HEREBY CERTIFY THAT I HAVE SERVED THE WITHIN SUMMONS:

By delivering on the \_\_\_ day of \_\_\_, 20\_\_\_ at \_\_\_ M. a copy of the summons and a copy of the Complaint to the following defendants

(PLEASE PRINT THE FOLLOWING)

Form with fields for Private Process Server, Address, Phone, Company, and Signature.

I hereby certify that I have NOT served this Summons on the within named defendant(s)

because \_\_\_ is / are not to be found in this County for the following reason(s):

Mark Luttrell, Sheriff

This \_\_\_ day of \_\_\_, 20\_\_\_ By \_\_\_ Deputy Sheriff

Handwritten number: No. F-0063601 DW JDL

IN THE (CHANGEM/CIRCUIT) COURT OF TENNESSEE FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS

SUMMONS IN CIVIL ACTIONS

Carey MacLin PLAINTIFF

vs. World Wrestling Entertainment et al DEFENDANT

Came to hand

Edward Bearman Attorney for Plaintiff 14242

Tel. No. 901 682-3450



State of Tennessee  
Department of State

Division of Business Services  
312 Eighth Avenue North  
6th Floor Wm. R. Snodgrass Tower  
Nashville, Tennessee 37243

1/9/2008  
Date

70070220000300899223  
Certified Number

File No: CT-006368-07

Company:

Name: **VINCENT MCMAHON**

Agent/POE: WORLD WRESTLING ENTERTAINMENT, INC

Address: 1241 EAST MAIN ST  
STAMFORD, CT 06902-3520

Country:

RE: COREY MACLIN

VS: WORLD WRESTLING ENTERTAINMENT, INC AND VINCE MCMAHON

Notice of Service

The enclosed summons and attachments are hereby officially served upon you by the Office of the Tennessee Secretary of State pursuant to Tennessee Law. Please refer to the summons and attachments for details concerning the lawsuit filed against you. If you have any questions, please contact the clerk of the court which issued the summons. You can obtain the court's telephone number by calling information (area code) 555-1212. The name of the court and county where the court is located will be on the attached summons.

The summons will either tell you a court date and time at which you must appear to defend yourself or tell you the number of days from the day you are served within which you must file an answer upon the plaintiff's attorney. Failure to appear in court at the time specified or failure to answer the summons within the given time could result in a judgement by default being rendered against you for relief sought in the lawsuit.

The Secretary of State's Office cannot give you legal advice. If you need legal advice, please consult a private attorney.

Sincerely,

Riley C. Darnell  
Secretary of State

enclosures

initial

CC: