

EXHIBIT 1

Viscera (wrestler)

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Nelson Frazier Jr. (February 14, 1971 – February 18, 2014) was an American professional wrestler, best known for his appearances with the World Wrestling Federation/World Wrestling Entertainment (WWF/WWE) in the 1990s and 2000s under the ring names **Mabel**, **Viscera** and **Big Daddy V**. A former WWF World Tag Team Champion and WWF Hardcore Champion, he won the 1995 King of the Ring tournament and wrestled in the main event of that year's SummerSlam.^[1]

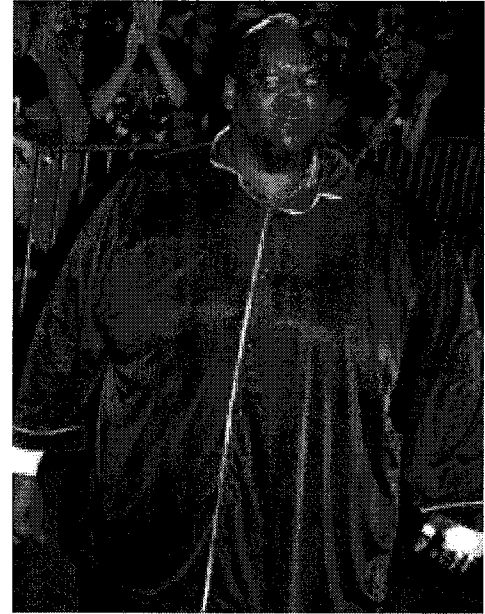
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Professional wrestling career

Early career (1993)

Viscera



Viscera in August 2005

Birth name	Nelson Frazier Jr.
Born	February 14, 1971 Memphis, Tennessee, United States
Died	February 18, 2014 (aged 43)
Spouse(s)	Cassandra Frazier

Professional wrestling career

Ring name(s)	Big Daddy Big Daddy V ^[1] Big Daddy Voodoo King Mabel ^[1] King V Mabel ^[1] Nelson Knight Viscera ^[1]
Billed height	6 ft 9 in (2.06 m) ^[1]
Billed weight	487 lb (221 kg) ^[1]
Billed from	"Harlem, New York" ^[1]
Debut	1993

Frazier began his professional wrestling career under the ring name **Nelson Knight**, one half of the team "The Harlem Knights" with his partner and storyline brother, Bobby.^[2] They wrestled in the United States Wrestling Association (USWA) and the Pro Wrestling Federation (PWF), twice winning the PWF Tag Team Championship^[3] before signing with the World Wrestling Federation (WWF) in July 1993.^{[2][4]}

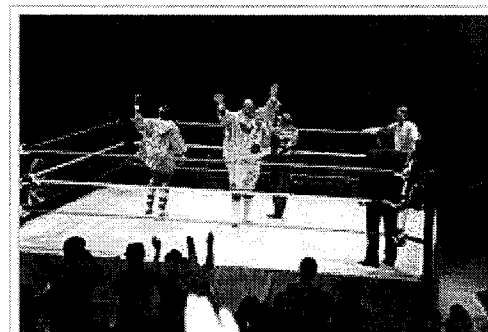
World Wrestling Federation (1993–1996)

Upon coming to the WWF, The Harlem Knights were given a new gimmick: Nelson became **Mabel**, Bobby became Mo, and they were given a rapping manager named Oscar.^[5] The new team, dubbed Men on a Mission, was introduced to the WWF audience through vignettes portraying them as three African American men trying to make a positive change in inner city neighborhoods. Clad in purple and yellow, they debuted as solid faces.^[6]

At WrestleMania X, Men on a Mission defeated the WWF Tag Team champions, The Quebecers, by countout, but did not win the belts. On April 29, 1994, they won the title at a house show in London, England. The Quebecers regained the title two days later in Sheffield, England.^[7]

In mid-1994, Mabel began wrestling more singles matches; he was seen as the spectacle of Men on a Mission due to his size, the "special attraction" that got used to make rising stars look good. He competed in the 1994 King of the Ring tournament, defeating Pierre of the Quebecers in the qualifying round before losing to IRS in the quarterfinals.^[8] He then had a match that pit "Rap vs. Country" against Jeff Jarrett at *Summerslam*, which Jarrett won.^[9]

In 1995, after losing a match against the reigning tag team champion-Smoking Gunns, Mabel and Mo brutally attacked them. Shortly thereafter they did it again and followed that attack up by turning on Oscar and beating him up, turning them both heel.^[6] Mabel dropped his fun-loving, positive personality in favor of adopting a more thuggish image and received push as a singles wrestler, winning the King of the Ring tournament in June.^[10] After that, Mabel became known as **King Mabel**, with Mo becoming "Sir Mo", his manager.^[6] Mabel was awarded a championship belt, designed and created by belt maker Reggie Parks. The belt, engraved with "King of the Ring", is one of a kind, as the World Wrestling Federation had not before or since created a belt for the King of the Ring. This belt was never seen on WWF TV.^[11]



Frazier as Mabel (center) with Mo (left) and Oscar (right) as Men on a Mission.

After his victory King Mabel became the top heel in the company and challenged WWF Champion Diesel at August's SummerSlam.^[12] However, just before SummerSlam the WWF made a decision to turn Davey Boy Smith, one of the company's more popular wrestlers, against the fans and replace Mabel as the company's top villain. The turn occurred on the August 22, 1995 edition of *Monday Night Raw*, where Men on a Mission were to wrestle Smith and Lex Luger, who were then known as The Allied Powers. Luger was not at the event, however, and Smith convinced Diesel to be his partner. Smith then attacked Diesel during the match and joined King Mabel and Sir Mo in assaulting him. The attack was called the "Royal Plan" and at least for a period it appeared that Smith, Mabel, Mo, and Jim Cornette were going to be aligned in the future. This never came to pass.

In addition, Frazier's actions leading up to SummerSlam almost resulted in his firing. Kevin Nash, the man who portrayed Diesel, said in an interview with Kayfabe Commentaries that Frazier's style was very reckless and he had little regard for the safety of his fellow wrestlers. Nash said that entering the match at SummerSlam, Frazier had already injured "six or eight" of his colleagues in the ring. Nash said that one of the injuries was to one of the Samoans on the roster (Fatu) and that alone was a red flag. Nash pointed to a move Frazier performed where he would execute a sitdown splash to the opponent's lower back. Most wrestlers who perform this move, such as the aforementioned Fatu (who adopted the move later in his career) and Earthquake, do so without incident as they perform it in such a manner that very little of their body weight actually comes in contact with the opponent's body. Nash said that when Frazier performed the move, he would kick his legs out before he did so. This left no room for Frazier to stop himself before impact, which caused all of his weight (at the time, well over 500 pounds) to drop onto the opponent's body. With this in mind, Nash told Frazier not to do the move. Frazier disregarded the request and performed the sitdown splash on Nash's lower back anyway, which caused his spine to compress and his core muscles to stretch out and left Nash with a badly strained abdomen that affected his performance the rest of the match, along with the feeling that he had suffered some sort of permanent damage to his spine. Backstage, Nash recounted that a furious Vince McMahon had already drawn up Frazier's release and was about to serve it to him but Nash convinced him to reconsider as he did not think Frazier's actions warranted a dismissal. Nonetheless, Frazier was demoted from his position as the top villain in the company in favor of Smith after SummerSlam.

Frazier was instead inserted in the ongoing feud between Yokozuna and The Undertaker, which saw Mabel help Yokozuna attack a downed Undertaker. During the course of the attack, Mabel hit several leg drops to Undertaker's face, legitimately fracturing his orbital bone and putting him out of action for two months.^{[13][14]} Although King Mabel was to wrestle The Undertaker once he returned, Frazier's days in the WWF were numbered after this incident as the company was not happy with him injuring yet another of its top stars.

The Undertaker returned wearing a Phantom of the Opera-style mask and, a month later, defeated King Mabel in a Casket match at In Your House 5: Seasons Beatings.^[15] After this match, Frazier's push came to an end and within several weeks both he and Horne were fired. His last three matches were on the New Year's Day edition of *Raw* when he was buried in an eight-second loss to Diesel, on the January 6, 1996 edition of *WWF Superstars* when he lost a rematch to The Undertaker in a casket match, and in the 1996 Royal Rumble match where he was the third wrestler eliminated at the hands of his former rival Yokozuna.

Independent circuit (1996–1998)

Frazier then wrestled for the Puerto Rico-based World Wrestling Council (WWC). There, he feuded with Carlos Colón. The Universal Heavyweight Championship was held up after a match between the two. Mabel soon after won the championship and held it for a month.^[16]

He also returned to Tennessee to wrestle for the United States Wrestling Association, which went through a number of administration changes during his stay, and was rebranded Memphis Championship Wrestling and Memphis Wrestling. He captured the USWA Heavyweight Championship in March 1996 and the North American Heavyweight Championship in February 1998. These were each the top title in the promotion at the time.^{[17][18]}

On November 1, 1998, Mabel made a one-night-only surprise appearance at Extreme Championship Wrestling's November to Remember, as a Full Blooded Italians member with Ulf Herman, attacking Tommy Rogers and Chris Chetti until Spike Dudley made the save.

Return to WWF (1998–2000)

On July 6, 1998, Mabel made a one-night-only surprise return to the WWF to unsuccessfully challenge the new King of the Ring, Ken Shamrock.^[19]

He made his full-time return in 1999, first appearing at the pre-show for the Royal Rumble, then on the show itself, where he was kidnapped by The Undertaker, his Acolytes (Bradshaw and Faarooq) and Mideon.^[20] The next night on *RAW*, he was reintroduced as **Viscera**,^[2] and began acting as the Ministry of Darkness' enforcer, adopting a gothic look in the process, including white-out contact lenses, a bleached mohawk and a black bodysuit.^[21]

After the July 1999 break up of the Ministry, Viscera floated around the mid-card, frequently teaming with fellow former Ministry member Mideon and becoming part of the burgeoning hardcore division, winning the WWF Hardcore Championship on April 2, 2000, and losing it minutes later, in the same Battle Royal-style match.^[22] He also feuded with Mark Henry after body splashing Henry's girlfriend, Mae Young, before he was released from his WWF contract in August 2000.

Return to the independent circuit (2000-2004)

Following his release from the WWF, Frazier returned to the independent circuit.

Total Nonstop Action Wrestling (2003)

In March 2003, Frazier, as Nelson Knight, made a surprise appearance at a weekly Total Nonstop Action Wrestling pay-per-view, at the side of Ron Killings.^[23] He appeared once more the next week.^[24]

Second return to WWE (2004–2008)

Frazier, as Viscera, returned to the WWF – by then renamed World Wrestling Entertainment – in September 2004, surprise attacking former Ministry of Darkness leader, The Undertaker, with fellow former Ministry member Gangrel, at the command of former Ministry Acolyte, John "Bradshaw" Layfield.^[25] After two weeks on *SmackDown!*, he was moved to the Raw brand.^[26]

In his first three months on the Raw brand, Viscera mainly wrestled on *Raw's* sister show *Heat*, only making sporadic appearances on *Raw*.^[2] His first major storyline there started in April 2005, when he aligned with Trish Stratus as part of her feud with Lita and Lita's husband, Kane.^[27] While working together, Viscera and Stratus appeared in a segment in which he attempted to seduce her, only to be rebuffed. Stratus implied he would first need to "take care" of Kane.^[28] That segment began a gimmick change for Viscera, who transformed into "The World's Largest Love Machine". After losing to Kane at Backlash 2005, he injured Stratus with his Big Splash finishing move, angry about her constant belittling of him, turning face in the process.

Viscera began wrestling in pajamas and making overtly sexual gestures in the ring. He became smitten with *Raw* ring announcer Lillian Garcia and tried different tactics to seduce her every week.^{[29][30]} At Vengeance in June, Garcia finally reciprocated, proposing to him in the center of the ring, only to be turned down and left crying in the ring when The Godfather arrived with many of his prostitutes to show Viscera what he would be leaving behind if he got married.^[31]

Viscera then teamed with Val Venis to form V–Squared. They teamed together for nearly nine months, mainly on *Heat*. They challenged for the World Tag Team Championship on several occasions, but never held the title.^[32] When Venis was sidelined with a legitimate injury in April 2006, Viscera returned to singles wrestling. He attempted to reconcile with Garcia, but was interrupted and attacked by Umaga during his proposal.^[33] Two weeks later, when Garcia was legitimately and accidentally knocked from the ring apron by Charlie Haas and sprained her wrist,^[34] the incident was worked into a storyline of Haas and Viscera fighting over Garcia.^[35] After Lillian declared she wanted to be just friends, Haas seemingly raked Viscera in the eye, with Viscera feigning to accidentally Samoan slam Lillian. After Viscera gave Lillian the Samoan slam, both men laughed about the incident, in the process turning Viscera heel once again.^[36] The team split up when Haas reunited with Shelton Benjamin to reform The World's Greatest Tag Team.

On June 17, 2007, Viscera was sent from the Raw brand to ECW in the supplemental section of WWE's draft.^[37] Three weeks later, he debuted on *ECW on SyFy*, repackaged as **Big Daddy V**, a "hired muscle" character in the employ of Matt Striker, arriving just in time to help Striker in his rivalry with The Boogeyman.^[38] After disposing of The Boogeyman, Big Daddy V defeated Tommy Dreamer in the ECW brand's Elimination Chase to become the number one contender for the ECW Championship at No Mercy.^[39] There, he lost to CM Punk by disqualification, when Striker interfered in the match.^[40] He then feuded with SmackDown's Kane. He participated in the No Way Out Elimination Chamber match, but was eliminated early.

He wrestled his last WWE match on March 11, 2008, for an episode of *ECW on SyFy*, losing to CM Punk in a Money in the Bank qualifier. In the 2008 WWE Supplemental Draft, he was drafted to the SmackDown brand.^[41] Frazier was released from his WWE contract on August 8, 2008, before ever wrestling for SmackDown.^[42]

Second return to the independent circuit (2008–2014)

Frazier joined the National Wrestling Alliance, as **King V**. On October 4, 2008, in Robstown, Texas, King V defeated Andy Dalton and Joey Spector in a handicap match.^{[43][44]}

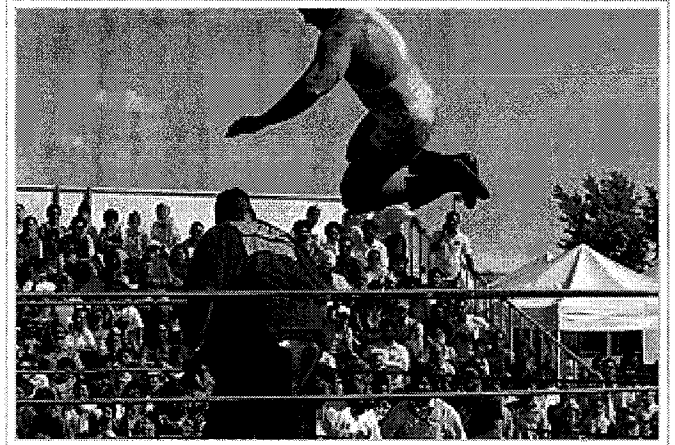
On August 8, 2009, at Juggalo Championship Wrestling (JCW)'s 10th Annual Gathering of the Juggalos, Viscera defeated 2 Tuff Tony in a "Loser Leaves JCW" match, with WWE Hall of Famer Terry Funk as special guest referee. After the match, Frazier, Funk, and Balls Mahoney (who had interfered earlier in the match) all attacked Tony.

In September 2012, Big Daddy V appeared for the Japanese promotion Inoki Genome Federation at their GENOME 22 event, losing to Atsushi Sawada. Frazier performed at three Family Wrestling Entertainment shows in 2012 as Big Daddy V, first defeating Malta the Damager in a tables match in February.

Frazier's final match, as Big Daddy V, was a win over René Duprée on Qatar Pro Wrestling's inaugural tour, on October 5, 2013.^[45]

All Japan Pro Wrestling (2010–2011)

Frazier wrestled for All Japan Pro Wrestling, as **Big Daddy Voodoo** (later just **Big Daddy**), and held the All Asia Tag Team Champion with TARU from April 29 to August 29, 2011. He was part of the Voodoo Murders stable. He left AJPW in late 2011, after competing in the World's Strongest Tag Determination League with Joe Doering.



Tiger Ali Singh delivering a bulldog to Frazier in 2012.

Acting career

Frazier made his film debut in 2009, playing Ginormous in *National Lampoon's 301: The Legend of Awesomest Maximus*.^[46] He also appeared as Animal in *Wrong Side of Town*.^[47]

Death

On February 18, 2014, Frazier died of a heart attack, four days after turning 43.^{[48][49][50]} He was cremated, and his widow divided the ashes into 500 pendants as gifts for his loved ones.^[51]

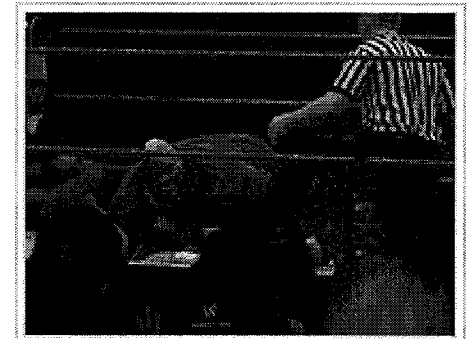
On the one year anniversary of Frazier's death, his widow filed a wrongful death lawsuit against WWE, alleging that the company had concealed information, misrepresented research and misinformed Frazier and other wrestlers on performance risks relating to concussions and chronic traumatic encephalopathy, which the suit claims left him with severe short-term memory loss, migraines and depression, which contributed to his death.^[52]

The next day, WWE told PWInsider.com, "WWE has not been served with a lawsuit by Cassandra Frazier. If served, we will vigorously contest this lawsuit brought by the same lawyers who have been soliciting people to sue WWE without merit."^[53] WWE attorney Jerry McDevitt expanded upon this in an interview with the *Boston Herald*, explaining that the company was considering pursuing action against Cassandra Frazier's attorney, Konstantine Kyros, who has been involved in other lawsuits against WWE. McDevitt called Frazier's death "tragic", but added: "It's ridiculous that someone can ... try to blame someone because a gentleman with a weight problem died of a heart attack in the shower eight years after he last performed."^[54]

In wrestling

- **Finishing moves**
 - **As Big Daddy V**
 - *Big Daddy V Drop* (Elbow drop, sometimes while running)^{[4][55]}
 - **As Big Daddy Voodoo / King V**

- Chokeslam^[56]
- Running splash,^[56] sometimes from the top rope^[57]
- **As Viscera**
 - *Embalmer* / *Viscera Driver* / *Sex Drive* (Chokebomb)^[55]
 - *Viscera Drop* (Running splash)^[55]
 - Piledriver - 1999



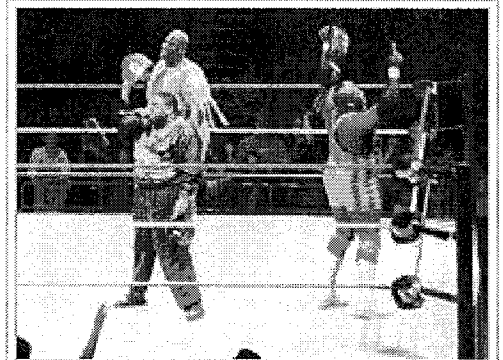
Viscera performing the *Viscagra* on Trevor Murdoch.

- **Signature moves**
 - Samoan drop^[55] / *Ghetto Drop*^[55]
 - Spinning heel kick, as a counter to an on coming opponent^[55]
 - Spinning side slam^[55] / *Whirlwind of Love*^[55]
 - *Viscagra* (Amateur-style back riding position with pelvic thrusts)^[2] – 2005–2007
- **Managers**
 - Oscar^[55]
 - Mo / Sir Mo^[55]
 - Matt Striker^[4]
 - Trish Stratus^[55]
- **Nicknames**
 - "Big Vis"
 - "The Mastodon"
 - "The World's Largest Love Machine"
- **Entrance music**
 - "Men on a Mission" by Jim Johnston (WWF; 1993–1995)
 - "The Lyin' King" by Jim Johnston (WWF; 1995–1996)
 - "Stayin' Alive" by N-Trance (ECW; 1998)
 - "Ministry" by Jim Johnston (WWF; 1999)
 - "Big Vis" by Jim Johnston (WWF; 1999–2000)
 - "Advance of the Zombies" by Jim Johnston (WWE; 2004)
 - "Blood" by Jim Johnston (WWE; Used while teaming with Gangrel)
 - "Another Way Out" by Jim Johnston (WWE; 2004–2005)
 - "Love Machine" by Jim Johnston (WWE / AJPW; 2005–2007, 2009–2012)
 - "Hello Ladies" by Jim Johnston (WWE; Used while teaming with Val Venis)
 - "Calling All Cars" by Jim Johnston (WWE / AJPW / Independent circuit; 2007–2008, 2011–2012)

Championships and accomplishments

- **All Japan Pro Wrestling**
 - All Asia Tag Team Championship (1 time) – with Taru^[58]
- **Memphis Wrestling**
 - Memphis Wrestling Southern Heavyweight Championship (1 time)^[17]

- **Music City Wrestling**
 - MCW North American Heavyweight Championship (1 time)^[18]
- **New England Pro Wrestling Hall of Fame**
 - Class of 2013^[59]
- **Ozarks Mountain Wrestling**
 - OMW North American Heavyweight Championship (1 time)^[60]
- **Pro Wrestling Federation**
 - PWF Tag Team Championship (2 times)^[3] – with Bobby Knight
- **Pro Wrestling Illustrated**
 - PWI ranked him **#49** of the top 500 singles wrestlers in the PWI 500 in 1995^[61]
- **United States Wrestling Association**
 - USWA Heavyweight Championship (1 time)^[17]
- **World Wrestling Council**
 - WWC Universal Heavyweight Championship (1 time)^[16]
- **World Wrestling Federation**
 - WWF Hardcore Championship (1 time)^[22]
 - WWF World Tag Team Championship (1 time)^[7] – with Mo
 - King of the Ring (1995)^[10]
- **Wrestling Observer Newsletter awards**
 - Worst Feud of the Year (2007) vs. Kane
 - Worst Tag Team (1999) with Mideon
 - Worst Worked Match of the Year (1993) with Mo and The Bushwhackers vs. The Headshrinkers, Bastion Booger, and Bam Bam Bigelow at Survivor Series
- **X Wrestling Federation**
 - XWF Heavyweight Championship (1 time)^[62]



Men on a Mission celebrate their WWF Tag Team championship victory.

See also

- The Corporate Ministry
- Men on a Mission
- The Ministry of Darkness

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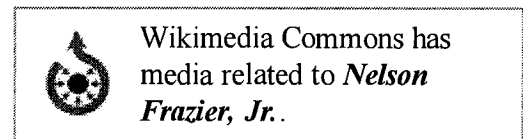
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External links

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- Nelson Frazier, Jr. (<http://www.imdb.com/name/nm0292551/>) at the Internet Movie Database



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