

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

RUSS MCCULLOUGH, RYAN
SAKODA, and MATTHEW ROBERT
WIESE,
individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

WORLD WRESTLING
ENTERTAINMENT, INC.,

Defendant.

CIVIL ACTION NO.
3:15-cv-001074 (VLB)
Lead Case

JOSEPH M. LAURINAITIS, *et al.*,

Plaintiffs,

v.

WORLD WRESTLING
ENTERTAINMENT, INC. *et al.*,

Defendants.

CIVIL ACTION NO.
3:16-CV-01209 (VLB)
Consolidated Case

PLAINTIFFS' FIRST SET OF REQUESTS FOR ADMISSION TO DEFENDANT
WORLD WRESTLING ENTERTAINMENT, INC.

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Plaintiffs hereby request that Defendant World Wrestling Entertainment, Inc. ("WWE") respond to the following Requests for Admission within thirty (30) days of the date of service.

DEFINITIONS AND INSTRUCTIONS

1. "You", "Your", "Yourself" and "WWE", as used herein, refers to WWE and any of its subsidiaries, parent companies, agents, or representatives, including

Florida Championship Wrestling (“FCW”) or NXT; any representative, attorney, agent, or any other person or entity acting on WWE’s behalf; and any predecessor of WWE, including but not limited to World Wrestling Federation and World Wide Wrestling Federation.

2. “Anyone acting on Your behalf”, as used herein, includes but is not limited to, Your attorneys, representatives, and consultants.

3. “Person”, as used herein, includes a natural person, firm, association, organization, partnership, business trust, corporation, or public entity.

4. “Performance” is any live or pre-recorded events sponsored, paid for, or promoted by WWE.

5. “Performer” or “Performers”, as used herein, include any person who participates or has participated as a wrestler in a Performance, whether as an employee or independent contractor.

6. “And” or “or” is to be construed as “and/or”.

7. If claiming attorney-client privilege or any other privilege or work-product protection for any document, provide a detailed privilege log as set forth in Fed. R. Civ. P. 26(e) that contains the information required by that Rule for each document that has been withheld.

8. Responses should be directed to Konstantine Kyros, Kyros Law Offices, P.C., 17 Miles Road, Hingham, Massachusetts 02043, kon@kyroslaw.com. These Requests are intended as continuing Requests requiring you to supplement your response in accordance with Rule 26.

REQUESTS FOR ADMISSION

Request No. 1: No Performer who signed a written contract with WWE was provided prior to the execution of such contract any written information or documents concerning the criteria utilized by the Internal Revenue Service or Connecticut statute and regulation to determine whether an individual is an independent contractor or an employee.

Request No. 2: No Performer who signed a written contract with WWE was provided prior to the execution of such contract any written information or documents concerning the legal consequences for an individual working with the WWE, between being classified as an independent contractor or an employee.

Request No. 3: No Performer who signed a written contract with WWE was provided prior to the execution of such contract any written information or documents concerning the potential injury that might be suffered by a wrestler while working for the WWE.

Request No. 4: No Performer who signed a written contract with WWE was provided prior to the execution of such contract any written information or documents concerning the potential or actual applicability of the Occupational Safety and Health Act to work performed by the wrestlers for WWE.

Request No. 5: No Performer who signed a written contract with WWE was provided prior to the execution of such contract any written information or documents concerning the potential or actual applicability of the Family and Medical Leave Act of 1993 (“FMLA”) to work performed by the wrestlers for WWE.

Request No. 6: Dr. Jeffrey Unger was a medical doctor employed by WWE, in part, to examine and/or treat its performers from about 1989 to 2004.

Request No. 7: The attached 1995 Monday Night Raw recording is authentic.

Request No. 8: Dr. Jeffrey Unger spoke from personal knowledge as a medical physician during the 1995 Monday Night Raw recording in Request No. 7.

Request No. 9: WWE wrote the script that contained the dialogue Dr. Jeffrey Unger spoke during the 1995 Monday Night Raw recording in Request No. 7.

Request No. 10: The storyline utilized in part in Request No. 7 was developed by WWE.

Request No. 11: WWE currently covers 100% of its performers’ in-ring injuries.

Request No. 12: WWE maintains and has maintained since its creation royalties' documentation for each performer, past and present.

Request No. 13: WWE has maintained injury reports when its wrestlers are injured at least since 1995.

Request No. 14: WWE collected information on concussions and/or post-concussion syndrome to write the script for the 1995 Monday Night Raw recording in Request No. 7.

Request No. 15: WWE did not disclose any information on concussions, post-concussion syndrome, or CTE to its performers until after the June 26, 2007 Chris Benoit press conference.

Request No. 16: WWE only implemented safer rings after the June 26, 2007 Chris Benoit press conference.

Request No. 17: WWE took no steps to inform its performers about the risks of neurological injuries resulting from repetitive head trauma prior to the June 26, 2007 Chris Benoit press conference.

Request No. 18: WWE has not informed its former performers about the dangers of concussions and/or post-concussion syndrome in any physical or electronic correspondence.

Request No. 19: WWE has not informed its former performers about the risks of repetitive head trauma in any physical or electronic correspondence.

Request No. 20: Many members of the Cauliflower Alley Club are former WWE performers.

Request No. 21: WWE scripted all live-television performances.

Request No. 22: WWE maintains records of all live television performances.

Request No. 23: WWE held “dark” matches and “house” performances.

Request No. 24: WWE did not record “dark” matches or “house” performances.

Request No. 25: WWE maintains records of all “dark” matches and “house” performances.

Request No. 26: WWE provided its performers with specific documents containing information relating to WWE banned moves prior to performances in 1995.

Request No. 27: WWE representatives met with Christopher Nowinski in 2007 to discuss funding him and his research.

Request No. 28: WWE donated over one million dollars to Christopher Nowinski and his Institute to fund research into CTE and brain injuries in on or about May, 2013.

Request No. 29: WWE is aware that Christopher Nowinski states he was forced to retire in 2003 from WWE wrestling due to concussions he sustained while performing for WWE.

Request No. 30: WWE and/or Christopher Nowinski did not obtain a single brain of a deceased wrestler since the monetary gift by WWE on or about May 2013.

Request No. 31: WWE did not attempt or seek to make calls to family members to obtain a single brain of a deceased wrestler since on or about May, 2013.

Request No. 32: WWE is aware that former WWE performers have died since May, 2013.

Request No. 33: WWE has not funded research to specifically study any medical consequence to professional wrestlers potentially resulting from their performances for WWE.

Request No. 34: WWE has directly funded research to study the brains of athletes other than wrestlers who have died.

Request No. 35: WWE is aware that former WWE wrestlers have died of drug overdoses since May, 2013.

Request No. 36: WWE funded in part the study titled “Clinicopathological Evaluation of Chronic Traumatic Encephalopathy in Players of American Football”, published July 25, 2017 in the Journal of the American Medical Association, attached hereto.

Request No. 37: Paul Levesque stated to USA Today that in 2011 WWE had 25 concussions out of the 150 wrestlers performing for WWE that year.

Request No. 38: WWE mails former wrestlers letters offering WWE sponsored drug rehabilitation.

Request No. 39: The letters referenced in the above Request do not mention neurological injuries.

Request No. 40: WWE did not provide health insurance to any of the Plaintiffs.

Request No. 41: WWE makes money from the WWE Network by displaying streaming videos of wrestling matches.

Request No. 42: WWE pays retired wrestlers royalties.

Request No. 43: WWE jointly ran a football league with NBC called the XFL.

Request No. 44: WWE hired doctors to treat the players in the XFL.

Request No. 45: WWE was aware in 2000 of concussion protocols and return to play rules.

Request No. 46: WWE bans certain wrestling moves based on their safety.

Request No. 47: WWE conducted studies to determine wrestling moves' safety prior to 2007.

Request No. 48: WWE conducted studies to determine the number of injuries associated with each move prior to 2007.

Request No. 49: An injured wrestler who does not work does not get paid.

Request No. 50: The Article attached hereto and entitled "Acceleration-Deceleration Sport Related Concussion: The gravity of it all" was published in the Journal of Athletic Training at 2001; 36(3): 253-256 in the year 2001.

Dated: September 20, 2017.

Respectfully submitted,

/s/ Konstantine W. Kyros
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CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of September, 2017, a copy of foregoing PLAINTIFFS' FIRST SET OF REQUESTS FOR ADMISSION TO DEFENDANT WORLD WRESTLING ENTERTAINMENT, INC. was served in accordance with Federal Rule of Civil Procedure Rule 5, via electronic mail to the following counsel of record:

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Hartford, CT 06103-1212
jmueller@daypitney.com

Jerry S. McDevitt, Esquire
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Pittsburgh, PA 15222-2613
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I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct.

/s/ Konstantine Kyros

Konstantine W. Kyros