

To Hon. Vanessa Bryant  
Affidavit of Carole M. Snuka

My name is Carole M. Snuka and I represent the Estate of James W. Snuka. The Estate is in the Probate Division of the Circuit Court For Broward County, Florida. I am a plaintiff in a lawsuit, *Laurinaitis et. al. v. WWE et. al.*, pending before you. This affidavit is signed and sworn under the penalties of perjury. I am making this statement freely and voluntarily, I have read and understood everything written in this statement. The facts, names, dates and information in this statement are made to the best of my recollection.

My late husband, Jimmy "Superfly" Snuka, was one of the most famous and well-known wrestlers in the world to this day. He was a beautiful human being that loved his family and his fans. We were married for almost 12 years and together 20 years. I was Jimmy's caregiver in the last years of his life.

As a result of Jimmy's career with the WWE, he sustained repeated head trauma, including concussions, and as a result, he suffered from dementia, Alzheimer's disease, and was recently diagnosed with Chronic Traumatic Encephalopathy ("CTE").

These injuries robbed Jimmy of his health, his memories, and his relationships with his friends and his family. In the last years of his life, he could no longer do even the simple things he had enjoyed so much, like eating his favorite meal or watching a movie on TV. He couldn't spend the same type of quality time that he had previously enjoyed with his loved ones, as he eventually got the point where he didn't even know who we were. It broke my heart that he did not even realize I was his wife at times. Jimmy was stripped of his dignity; he could not even bathe himself without help.

Jimmy was born in Fiji where he received minimal schooling or education and unfortunately he remained illiterate and he could not read or write. Jimmy signed WWE contracts that were given to him to sign frequently over the course of his WWE career. He signed them because he trusted the WWE, the WWE was aware he could not understand them. No one at WWE ever made an effort

to explain any of these documents that he was expected to sign, he was expected to sign just like most of the wrestlers he worked with. Jimmy was never represented by an attorney when signing contracts with WWE. I do not have copies of any of his old contracts. I do not have, or believe that he ever signed, a release with WWE for any lawsuit or legal claims against them.

The WWE sent Jimmy Form 1099s as he was misclassified as an independent contractor. I have been unable to find our old tax paperwork or returns. I do, however, know that Jimmy would not have understood the difference between an independent contractor and an employee.

Jimmy trusted Vince and even called him his "brother Vinny." We thought of the WWE as a family and we thought that the feeling was mutual. We put our trust in them to do what was best for him.

Jimmy performed for WWE in hundreds of matches. Jimmy was the headliner for much of his time at WWE. He was a main star in WrestleMania's V, VI and VII. His high-flying style helped popularize wrestling around the world, and he is considered one of the most successful WWE performers of all time. Some would say that his style was one of the major turning points in the success of the WWE.

Most of Jimmy's full-time wrestling was at the height of the 1980s. He went on to make occasional appearances for WWE, both in and out of the ring, between 2005 and 2015. His signature move, the "superfly splash," was to dive off of the top rope and land on his opponent. He was involved in one of the most famous stunts in WWE history on October 17, 1983 when he leapt 15 feet off the top of a metal cage in Madison Square Garden.

Jimmy sustained numerous blows to the head and described to his doctors multiple events that were consistent with concussions. During an infamous WWE interview known to millions of fans, he was struck in the head with a coconut that smashed open on contact. Toward the end of his career the night of his induction into the Hall of Fame in 1996, he was hit in the head with a steel chair by Kane. This blow was extremely difficult to recover from and he was up all night after the incident.

The following is a brief summary of Jimmy's wrestling career:

1970-82	territories	Hawaii, Portland, Houston, Jim Crockett Promotions, Georgia, Mid-Atlantic
1982-85	WWE	One of the most popular stars in the world
1985-89	inactive	Largely out of wrestling
1986-87	AWA	Made a few appearances in the AWA
1989-93	WWE	Returned to WWE
1992-96	ECW/indies	He wrestled for ECW and some independent promotions
1996		Inducted into WWE Hall of Fame and Appears in Survivor Series 11/96
1996-2015	inactive	Jimmy is largely semi-retired.
2000	WCW	Made an appearance on WCW
2005-2015		WWE made occasional appearances and some low impact wrestling a few times as a legend

#### Medical Information

We have extensive medical records and videos of the last years of Jimmy's life. While he was alive, the diagnosis we received from Neurologists was that he suffered from brain damage and that the cause was wrestling-related head trauma. His death certificate lists encephalopathy and dementia among the causes of his death.

After he died, with the help of our counsel in this case including Mr. Kyros, we donated Jimmy's brain and spinal cord to a physician and neuropathologist at the forefront of CTE research. His diagnosis, which we just recently received, was that Jimmy had Alzheimer's disease and Chronic Traumatic Encephalopathy ("CTE").

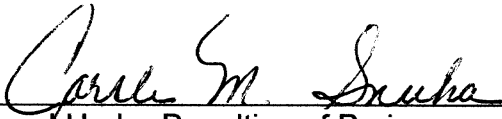
After Jimmy died Stephanie McMahon called him "one of the greatest icons in the history of our business." Jimmy was a simple man who used his body to build the WWE into a billion-dollar business. He never knew that the sacrifices he made for WWE would cause him to lose everything in the way that he did as a result of this severe and degenerative disease. The WWE hid these dangers throughout Jimmy's career in order to maximize profits. The WWE caused him

harm to make themselves succeed, then tossed him aside, leaving him with a deteriorating brain and quality of life.

Currently, WWE is still hiding from brain injuries and CTE. The WWE refused to help people like Jimmy and does not educate the wrestlers that are still alive about CTE, or acknowledge that these wrestlers are at increased risk of CTE.

I sincerely hope that the court gives Jimmy the justice he was denied in his lifetime. The WWE needs to be held to account for its inaction on this issue.

Carole M. Snuka

A handwritten signature in cursive script that reads "Carole M. Snuka". The signature is written in black ink and is positioned above a horizontal line.

Signed Under Penalties of Perjury  
October 25, 2017