

In addition to head injuries, I continued to suffer additional injuries to my ankles. A couple of months after the concussion I sustained in the August 1996 tag-team match described above, I was performing in the pay-per-view Survivor Series on November 17, 1996 in New York City at Madison Square Garden, when my ankle snapped during a four against four survivor match. I could not walk after the match. That particular venue, unlike almost any others, had a doctor available, so I was taken to a New York City hospital. Again after that, my ankle was not given sufficient time to heal. I may have performed in other matches in the interim, but my next televised performance was less than a month later, in a tag team match in the December 16, 1996 episode of Monday Night Raw. This constant cycle of injuring my ankles and being forced to perform without allowing them to heal caused the debilitating ankle problems that I suffer from and need surgery to correct today.

After being inactive from 2000 through 2004, I returned to WWE in early 2005. On the March 14, 2005 episode of RAW, I reunited with my tag-team partner Shawn Michaels. After that performance and another very successful match, I had impressed the WWE and was offered another contract, which I signed. By mid-2006, I had fought in many more WWE matches, and to the best of my recollection, was released from my WWE contract and then re-signed two more times. Then again in September of 2006, I signed with WWE to work as a trainer with new talent, but the contract was terminated before I even started. I returned to the WWE again in 2007 – 2009 for individual matches. I last wrestled for WWE on October 19, 2009 on an episode of RAW.

In the later years of my career, I continued to sustain additional head injuries, including concussions (none of which were treated), and I continued to put severe stress on my already severely injured ankles until they were eventually destroyed.

WWE Career – Aftermath

a. Ankle Injuries and Addiction

By the time my career ended in 2009, I had developed an addiction to pain medication. Whenever I was injured wrestling (which over 20 years is more times than I can remember and is far too many to attempt to describe here), I was typically supplied with pain medication by Dr. Unger. It was basically the cure-all regardless of what the injury was. After being injured repeatedly for so many years, I got to the point where I needed the pills themselves and not just for help with the injury because after taking such high dosages so frequently over such a long period of time, my body had become dependent on the drugs.

What is worse, and is the reason I still suffer from addiction, is that I still require medication to treat the excruciating pain I experience every day because of the severe ankle injuries I sustained over the course of my prolonged wrestling career. Years of constant injuries and no treatment or time to heal eventually destroyed my ankles.

After I stopped wrestling for the WWE and was no longer able to get pain medication from a WWE doctor, it became almost impossible to get prescribed to pain medication on my own. I do not have health insurance and doctors today are very hesitant to prescribe pain medication to former-wrestlers, given the frequency of wrestlers dying as a result of overdoses. As a result, I have at times turned to alcohol as an alternative to try to drink the pain away.

The only assistance I have received from WWE was a brief stint in rehab in October of 2014 that was ineffective, as it did not get to the root of my problem, which is that my ankles are destroyed and I will be in constant pain until I have surgery. However after my friend, former wrestler ██████████ went into a WWE rehab program, his girlfriend encouraged me to enroll as well and I agreed to give it a try. I received a letter from WWE offering to pay for drug or alcohol rehab. ██████████ girlfriend called WWE for me and arranged for me to start treatment at a facility near my home in Louisiana at the

time. I was only there for 10 days. The clinician from the facility indicated that I was self-medicating from all my injuries. I spoke with someone from WWE after who asked if it had helped and I explained it did not because it did not correct the root of the problem, which were the physical injuries to my ankles, but that I still appreciated the help.

My stint in rehab was doomed from the beginning to fail because for as long as I remain in severe pain due to my ankle injuries, I will continue to need medication, and no amount of rehab will be able to cure me of my addiction if I am physically unable to stand without self-medicating.

Currently, I suffer from two collapsed ankles, with one of my ankles being positioned sideways and the other one requiring a cast. I am in dire need of reconstructive surgery to correct the problem. I do not have health insurance, and cannot afford to pay for the required surgery. As a result, I suffer from severe and debilitating pain every day and can barely even stand unless I am medicated as the pain is too excruciating.

I have, over the years, begged the WWE to pay for the surgery I desperately need, and they have refused each time. Specifically, in 2015, after the brief stint in WWE-facilitated rehab, I called Anne Russo, who was the head of WWE Wellness at the time, to make my request, which she refused. I tried again in 2016 and called Bob Clark, who also refused.

I explained to each of them that my ankles had been destroyed due to in-ring injuries, and that I needed help. I stated that as a result of my WWE career, I can now barely walk due to the injuries I sustained in ring. I worked for the WWE full time; I committed my life to the WWE for a significant period of time; I got hurt wrestling; and I worked through it. My injuries are as bad as they are now due to WWE forcing me to work through my ankle injuries over the years, even going so far as to require me to perform in a match with a broken ankle, and never providing me with medical treatment or even time to heal. WWE nevertheless refused to pay for my surgery.

I argued that the WWE has promised that it would help former wrestlers with addiction problems, but that until I can stand without requiring ten Vicodin (or an excessive amount of alcohol as a last resort), my addictions cannot be cured. Since

WWE has taken on an obligation to treat former wrestlers' addiction problems, it should pay for my ankle surgery so that I am able to fight my addictions. WWE still refused to pay for my surgery.

I explained to them that an old friend, Dr. McCluskly, is a renowned surgeon who specializes in ankle reconstruction surgery. He has offered to perform the surgery for free, so the only costs associated with the surgery would be the hospital bills, and that I would only require about \$30,000 to have my ankles fixed. I pointed out that I made the WWE a million dollars in the last quarter and that it was incredibly unfair that they would not help me with this debilitating problem. They were not persuaded.

I reiterated the fact that I got injured working for WWE, and that I was on drugs because of that injury, and asked why the WWE would pay for multiple extended rehab programs for individuals who only used drugs recreationally, but won't help former wrestlers suffering from injuries sustained while wrestling for WWE. For example, WWE paid for ten stints in rehab for a friend and former WWE wrestler, ██████████ who used drugs recreationally. As much as I like ██████████ his problem resulted from partying and poor choices; my injuries and related addiction are work-related. It seems unfair that WWE would choose to pay for someone who partied too much to go to rehab ten times but won't pay for the surgery I need because of injuries I sustained in the ring.²

The response I received from both Ann Russo and Bob Clark remained the same: I raised some good points, but that if they did it for me, they would have to do it for everyone. I offered to sign a confidentiality agreement if they would just help me, and they said no because that could expose WWE to legal liability.

Vince would often say, "it's not about friendship; it's about business." Similarly,

² As an aside, I made this comparison only to illustrate that it is unfair that WWE refuses to pay for treatment of my work-related injuries, but I do give WWE some credit for at least helping those with other problems, especially when so many guys that I wrestled with have died at very young ages. I looked at an old wrestling program from a show I was in recently, and realized about half the guys listed had died at young ages (Curt Hennig, Big Boss Man, Rick Rude, Road Warrior Hawk, just to name a few). This saddened me deeply, and I support any assistance that WWE provides to help prevent future tragedies and untimely deaths. I just find the policy unfair in that it excludes me from receiving help since I am unable to stop taking pain medication until my underlying work-related injury is treated.

my involvement in this lawsuit is not personal, and is simply about trying to get the WWE to do what is right. I have no anger towards the McMahon family, and I look back with pride on my WWE wrestling career and all that I accomplished. I have no desire for vengeance. I just want the WWE to treat me fairly and pay for my hospital fees so I can get the surgery to correct the injuries that are the direct consequence of my WWE career. This would be the right thing to do even if WWE had not committed itself to helping former wrestlers with addictions. Now that it has taken on that obligation, WWE clearly has a duty to pay for the surgery I need to correct the work-related injuries I sustained that are prohibiting me from battling my addictions.