

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

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<b>RUSS McCULLOUGH, et al.,</b>	:	<b>No. 3:15-CV-01074 (VLB)</b>
	:	<b>LEAD CASE</b>
<b>Plaintiffs,</b>	:	
<b>VS.</b>	:	
<b>WORLD WRESTLING ENTERTAINMENT, INC.,</b>	:	
<b>Defendant.</b>	:	

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<b>EVAN SINGLETON and VITO LOGRASSO,</b>	:	<b>NO. 3:15-CV-00425 (VLB)</b>
	:	<b>CONSOLIDATED CASE</b>
<b>Plaintiffs,</b>	:	
<b>VS.</b>	:	
<b>WORLD WRESTLING ENTERTAINMENT, INC.,</b>	:	
<b>Defendant.</b>	:	

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**DECLARATION OF SEAN MICHAEL WALTMAN**

I, Sean Michael Waltman, do hereby declare and state the following under penalty of perjury:

1. My name is Sean Michael Waltman and I am over 18 years old. I am a professional wrestler and have wrestled for World Wrestling Entertainment (“WWE”), World Championship Wrestling (“WCW”), and Total Nonstop Action Wrestling (“TNA”), as well as other professional wrestling promoters’ programs. I have often wrestled under the ring names Syxx-Pac, X-Pac, and Sean Waltman.

Over the years at WWE, WCW, and TNA, I have won a number of Championship titles.

2. On June 11, 2016, I attended the Legends of the Ring Fan Fest convention at the Crowne Plaza Hotel in Monroe, New Jersey as a professional wrestling celebrity for purposes of meeting fans and signing autograph requests.

3. While at the Legends of the Ring Fan Fest convention on June 11<sup>th</sup>, I observed Renee Dupree, a former WWE wrestler whom I know from professional wrestling. I also observed Konstantine Kyros, who was with Mr. Dupree at the convention and is the lawyer involved in the CTE cases brought against WWE.

4. During the day of the June 11<sup>th</sup> convention, I observed Mr. Kyros and Mr. Dupree approaching and talking to a number of former WWE wrestlers whom I recognized from my professional wrestling career. I also learned that Mr. Kyros was handing out his business card to former WWE wrestlers.

I hereby declare, under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Dated: June 20, 2016  
St. Petersburg, Florida

  
Sean Michael Waltman