

To Hon. Vanessa Bryant

Affidavit of Jon Heidenreich DOB: 6/28/69

My name is Jon Heidenreich, 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.

Wrestling Career

I am totally and completely dedicated to doing all and everything in my power to help you to show the world how the WWE operates its company and business with a total disregard for the health and well being of many, if not all of the athletes who sacrifice so much for that company. That same company took over the world of wrestling and is seen in over 300 countries. The WWE earns profits that I honestly could probably never imagine. This is my story in my own words.

This is an overview of my career with WWE. I trained in Los Angeles area with a farm system for WWE. I was signed in 2001 on developmental contract that paid me \$500 weekly. I trained out there for a year, and then moved to Louisville, Kentucky, another farm school for WWE. My pay increased to \$750 in Kentucky. After several months there, I was informed I was going on the road to debut on television. I believe I signed a contract, and I was sent 1099 forms. I was paid about \$100 in royalties in recent years.

Career Summary

2001-02	WWE	Signed to a developmental contract
2002-03	Japan	Wrestled for the Zero One promotion in Japan
2003-06	WWE	Returned to WWE to the main roster where I became tag team champion
2006-09	Indies	wrestled a handful of matches before retiring

I honestly think that they have never paid me all the money I earned due to their contracts being very difficult to understand and figure out. They do not want any of their wrestlers seeking advice from agents or legal advice. We were told to not discuss our details of our contracts with anyone else. I have some copies of checks that when I started making large amounts on my weekly checks.

I injured my shoulder (third degree AC separation) before going on the road. I went to southern orthopedics in New Orleans for repair.

WWE did not want me to see the doctor or to have the needed repairs. They wanted me to see a local doctor in Louisville, I ended up seeing Doctor Habig, The Saints (football team) Orthopedic Physician and very reputable, who performed the surgical repair.

It was supposed to be a three-month rehab, but due to complications, I had a hematoma that had to be drained. After not healing I had to see a plastic surgeon who performed z plasty procedures and rehab took approximately six months. The day I was cleared to go back to wrestle, the WWE informed me I was being released.

I was in a state of shock to be totally honest with you, but I began pursuing work in other wrestling companies. I signed a contract with a Japanese wrestling company called Zero-One pro wrestling. I went on tours that ranged in shows from three to 10 matches or shows a tour. I would fly in and stay a week to 3 weeks and do all shows. I was paid on each tour amounts ranging from \$1000-\$2000 a match. While I was in the U.S. I drove 700 miles (1400 miles round trip) to Louisville, Kentucky I did this to pursue being signed back with the WWE.

Wednesday was the day that the WWE television show was taped; the promotions name in Louisville was Ohio Valley Wrestling. This show was what the office in Connecticut would view (The WWE headquarters). The office often sent scouts down there so it was my best chance at getting re-signed.

I also went to any WWE shows that I could drive to within the Texas,

Mississippi, Louisiana, Alabama area to try and get to workout for the WWE scouts, or get tryout matches (matches before show started officially to give new talent an opportunity to be evaluated). After approximately 6-7 months the WWE contacted me and re-signed me.

I went back to Louisville and spent several months in there before being told I was going to be put on the road with the RAW television show.

I debuted and had great success with my character. I was involved with my character heavily because I am a writer and developed my character and wrote a lot of material.

I had an injury while wrestling in a TV match. I had a hematoma in my thigh, basically a deep bruise in my quadriceps. It did not seem severe at first (right after the match) but I quickly noticed I could barely walk.

I was in California and flew home next morning, my wife picked me up at airport, my leg had swollen very badly, I had my wife drive me straight to the ER, it was a severe hematoma. Unfortunately I had to do extensive rehab because I was on crutches for a few weeks.

I rehabbed at Tulane Medical Center. The WWE was very unhappy about this situation. If you are not working for them they do not hesitate firing you because they expect the wrestlers that work for them to put Vince McMahon and his company before any and everything! This is no exaggeration, I swear to you! It's WWE first or you will be terminated, meaning you get fired.

I rehabbed as fast as I possibly could and got back to Louisville. I feared I was going to be fired again, but I was told I was going to be put on Smackdown their other television show.

I went on to wrestle at the top of the company. I wrestled the Undertaker and became one of the Legion of Doom. The travel schedule was totally insane; I ended up at the top of wrestling many hundreds of nights each year until they fired me after Hurricane Katrina.

On My injuries

I have been knocked out in WWE many times. I broke my right hand wrestling, I had a boxers fracture and my right hand has given me alot of trouble

since. Of course when I broke my hand wrestling with WWE I had to wrestle so I was never able to take any time off. I just wrestled with a removable cast.

I have also torn my right pectoralis muscle that took me almost 8 or 9 months to recover from. I have broken my right hand and broken both my thumbs and pinky fingers. I suffer from severe arthritis in both hands.

I have also broken my tailbone that causes me pain still. I have injured my right hip also that still causes me pain and discomfort. I tore my medial lateral ligament. I've also had a diagnosis from a doctor that suspects I have torn my anterior cruciate ligament in my right knee. My left shoulder was injured. I had a 3rd degree AC separation I had to have 4 operations on left shoulder. I had complication and had to have a plastic surgeon fix the incision because it would not heal. I also have the MRI of my right shoulder. I separated it while wrestling with WWE, but I didn't take off any time because the time I separated my left shoulder and took off time to have it surgically repaired they released me.

So my right shoulder is in bad shape. I have a large bone spur inside my right shoulder that causes alot of pain. I have the MRI reports that show the conditions of my spine. I have four bulging disc in my middle back that have bone spurs inside them. I've been to Oschner emergency room (Slidell Louisiana) for my left knee. I also have congestive heart disease. My left knee is so bad some days I can barely walk. I had to go to Oschner due to my left knee swelling so bad I could not walk, they drained over 100CCs of fluid and wrote me a prescription for Percocet pain medicine. They told me I needed to be seeing an orthopedic doctor I don't have money to do so.

I've also been diagnosed with manic depression by psychiatrist and attention deficit disorder by psychiatrist. I suffer from extreme depression resulting in me contemplating suicide almost every day.

What facts are personally known to me that form the basis of my belief that WWE or any of its agents or affiliates knew or should have known that wrestling caused traumatic brain injuries, including CTE?

The WWE has without a doubt been directly related to many of my

conditions that have harmed me. I was extremely successful, dedicated and enjoyed a tremendous amount of success in many areas of my life before and after my career with the WWE.

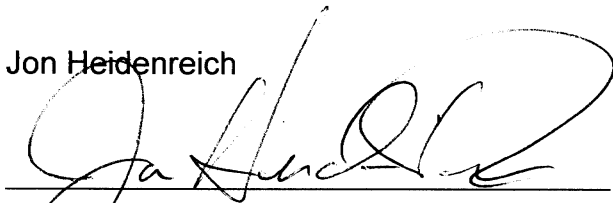
I gave the WWE everything for almost 8 or 9 years and they gave me little but unfair, dishonest, and inhumane treatment on so many levels. Vince McMahon does not care about me or anyone he is about greed.

I am grateful for justice to be heard and for my lawyer that is trying to help me and others in my similar situation.

I worked my entire life so diligently and had so much success and I can truly say that I lived a fairy tale life and was able to pursue and succeed at several of my dreams.

But I am suffering badly both physically and mentally. I am in a very dark, hopeless and helpless place. I am in dire need of hope. I have no money to get help from a doctor which is what I need desperately. I need help for my heart condition which could kill me if it continues to go unchecked. I also need to get to orthopedic doctor for my severe degenerative arthritis in my knees and shoulders and also the four bulging discs in my spine that have bone spurs inside them. I am really having severe mental issues, and I think they are from the head trauma I have had. I been knocked out so many times I can't even remember.

Jon Heidenreich

A handwritten signature in black ink, appearing to read 'Jon Heidenreich', written over a horizontal line.

Signed Under Penalties of Perjury

October 4, 2017