

To Hon. Vanessa Bryant

Affidavit of Dorris Billington on behalf of Thomas Billington DOB: 12/5/58

My name is Dorris "Dot" Billington and my husband Thomas Billington is defendant in a lawsuit, WWE v. Windham 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. I have also received the assistance of Anthony Josephedes who is Tom's manager and was involved in the communications with the WWE.

Tom is 58 years old, wheelchair bound and currently residing in the Dementia Ward of the Bedford Care Home in Leigh, a suburb of Manchester England, the address is WN7 2AH, Battersby St, Leigh, UK.

Tom began wrestling in England in 1975 and then moved to Canada in 1978 where he trained and wrestled in Stampede Wrestling with the well-known Hart Family. He then went on to Japan where he wrestled for several years increasing his fame, where he competed in Japan 1983 for the WWF Junior Heavyweight Championship.

He came to the United States having been recruited by the WWF in 1984-1988 wrestling where he and his Tag Team partner became one of the most well known wrestlers of the era called the British Bulldogs. He often used a move called the Diving Headbutt that was regularly used by Chris Benoit the first wrestler discovered to have CTE.

According to his biography, Pure Dynamite, Tom "British Bulldog" Billington (Winding Stair Press 1999) he was injured on December 13, 1986 with a back injury in a WWF event, in which he lost use of his legs (page 106-108). After which he is flown by Vince McMahon to a doctor where he is diagnosed with ruptured discs and permanent back injuries.

Billington in this book describes how McMahon pressured him into performing so that he could drop title belts. Billington explains that he cannot return to the ring, as he could not walk, McMahon is quoted saying: "Tom, I know

you're not well, but I need those belts back." Billington reluctantly returns and is hit in the head before the match pages 111-112.

After leaving WWF in 1988 he wrestled on and off until 1996 ending his career in Japan.

In 2012 Tom's friend and manager, Anthony Josephedes who had helped us in the past contacted WWE on our behalf to get an accounting of Tom's royalties or to inquire as to whether he was owed any.

On October 22, 2012 a WWE employee identified as Kevin Hennessy, Senior Director of Publicity replied that Billington was "active and being paid royalties per his last contracts with WWE."

At this point Billington had not been paid any royalties for over 15 years.

Further email communications with Kristin Altman and Scott Amann in the legal department proved unsuccessful in clarifying the situation or getting any response or accounting. The conclusion to these exchanges was to find a lawyer.

After retaining Mr. Kyros in 2015 to investigate our possible claims. We received legal advice and requested a letter be sent to WWE to obtain whatever contracts the WWE might have. Afterwards we learned that Tom was being sued by the WWE.

Medical Information

Tom is totally disabled physically and neurologically, he is confined to a bed and cannot write and can speak very slowly. We have been married for over 20 years and I have seen him waste away from his injuries.

Dorris Billington



Signed Under Penalties of Perjury
October 25, 2017