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COMMITTEE ON OVERSIGHT AND  
GOVERNMENT REFORM,  
U.S. HOUSE OF REPRESENTATIVES,  
WASHINGTON, D.C.

INTERVIEW OF: STEPHANIE MCMAHON LEVESQUE

Friday, December 14, 2007

Washington, D.C.

The interview in the above matter was held in Room 2157,  
Rayburn House Office Building, commencing at 9:10 a.m.

Appearances:

For COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM:

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For WWE:

STEPHANIE MCMAHON LEVESQUE, EXECUTIVE VICE PRESIDENT OF CREATIVE  
WRITING, TALENT RELATIONS AND LIVE EVENTS

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Mr. Leviss. Good morning. This is a transcribed interview of Stephanie McMahon Levesque by the Committee on Oversight and Government Reform.

The Chairman of the committee has sought this interview as part of the committee's investigation into allegations regarding the abuse of steroids and illegal drugs in professional wrestling.

Would you please state your name for the record?

Ms. Levesque. Stephanie McMahon Levesque.

Mr. Leviss. On behalf of the Committee on Oversight and Government Reform, I thank you for joining us today.

I am David Leviss. I am a senior investigative counsel with the majority staff of the committee.

I am going to ask everyone to introduce themselves, since there are so many of us here today.

Mr. Cohen. I am Brian Cohen. I am a senior investigator with the committee.

Mr. Buffone. Sam Buffone, staff, majority.

Ms. Despres. Sarah Despres, senior health counsel, majority staff.

Mr. Chance. Benjamin Chance, Republican staff.

Ms. Safavian. Jennifer Safavian, Republican staff.

Mr. Leviss. While you know your attorneys, I would ask for the record that they --

Mr. Koch. George Koch, Kirkpatrick Lockhart & Gates.

Mr. O'Neil. Mike O'Neil, K & L Gates.

Mr. McDevitt. Jerry McDevitt, K & L Gates.

Mr. Leviss. Thank you.

Let me just go over some general ground rules we have for these interviews. Typically, the majority staff will begin by asking questions. Several of us may chime in at times, but we will try to only ask you one question at a time. The minority will also have the opportunity to ask questions. We try to go by general topic areas to keep some order to it, but, if necessary, we may jump around a little bit.

As you can see, we have an official reporter who is taking down everything we say so that we have a written record of this interview. So it is very important that you give verbal, audible answers to every question. Do you understand that?

Ms. Levesque. Yes.

Mr. Leviss. Great.

The court reporter may interrupt us if we are talking over each other or if he can't hear an answer or question, and that is because we have asked him to do so so that we have an accurate record. Please wait until I finish my questions or any questioner finishes a question before beginning your answer. And we, in turn, will try to wait until you finish your answer before starting a new question. Understand?

Ms. Levesque. Yes.

Mr. Leviss. Great. You are required by law to answer

questions from Congress truthfully. If you fail to testify truthfully, you could be subject to criminal prosecution. Is there any reason why you would be unable to testify truthfully today?

Ms. Levesque. No.

Mr. Leviss. Great.

We try to take a short break every hour or so, but let us know if you need a break earlier. Our hope is that we can finish with you in just, you know, a couple, few hours this morning. So, just to give you a sense of what is to come. But, again, if you feel you need a break, please do let us know.

Ms. Levesque. Okay.

Mr. Leviss. Okay. Do you understand these guidelines, rules?

Ms. Levesque. Yes, I do.

Mr. Leviss. Okay. Any questions before we begin?

Ms. Levesque. No.

Mr. Leviss. Great.

#### EXAMINATION

BY MR. LEVISS:

Q I am going to start with just some background questions about your role at WWE. I understand that the corporation hasn't always been known as WWE, that there was some predecessor corporations. But if I refer to it as WWE, will you understand that I am referring to both the present company and its

predecessors?

A Yes.

Q Okay. What is your current position with WWE?

A My current position is executive vice president of creative writing, talent relations, and live events. They are working on shortening it, but that is what it currently is.

Q That is a lot for one business card. How long have you held that position?

A For the past couple months.

Q Okay. Have you held other positions with the company?

A Yes. I started -- well, not all the way back, but most recently I was the executive vice president of creative writing. Then about a year ago I added talent relations, and a couple months ago I added live events. And that is live event promotion and booking.

Q Okay. And prior to that position, did you have any other positions with the company?

A Yes. Prior to that position, I worked as an account executive in our New York sales office. Prior to that, I had a unique internship with both the chairman and the CEO. And prior to that, I held a number of internships, including switchboard operator when I was 13. I worked in media relations, dot-com, our production studio, a variety -- live event marketing. I have worked in a variety of assets in our company.

Mr. McDevitt. They didn't make her put up rings.

Ms. Levesque. No, my brother did, though, yes.

BY MR. LEVISS:

Q Family operation. How long have you been affiliated or working for WWE?

A Pretty much all my life, but really, consistently, interning since I was 13, and once I got out of college I became full-time.

Q Okay. So around what year did you start consistently?

A Full-time?

Q Yeah.

A '98.

Q Tell me, if you will, about your present roles and responsibilities in the organization, starting with creative writing.

A Okay. Starting with creative writing, I am in charge of -- we have three different shows. We have Raw, SmackDown and ECW. It is basically 5 hours of fresh programming every week, 52 weeks a year. We have no reruns. And I am in charge of all of the script writing that goes on for every show.

Q Okay. I assume you have a staff of writers who work with you?

A I do.

Q How many people are on that staff?

A We are pretty understaffed. It is about 10 people now.

Q And if you could just tell me in brief how the

script-writing process works. I mean, does the staff prepare drafts? Are you involved in original drafting? Are you more of an editor?

A Here is pretty much how it happens.

Q Sure.

A It is not a real wonderful process, because we don't have a lot of lead time. You know, we are week to week.

Q Sure.

A So my staff, I have a lead writer, and underneath him he has writers, associate writers, writers' assistants.

And the team works throughout the week. What happens is they bounce ideas off me creatively throughout the week, and then we have a meeting with Vince, Vince McMahon, who is the chairman and also the head creator of everything. The company is his vision in all aspects, make no mistake. And so then we present him with our ideas. And he gives approval or disapproval. We discuss, we come up with what creative work we are going to do, and then we go and draft the scripts.

On occasion, we do have drafts of the scripts to present to Vince at that meeting, but that is not always the best practice because they change so frequently.

Q And then, I guess, how far in advance of production are the scripts completed?

A Literally being processed the day of. I mean, they are produced that week, and then they are constantly changing



throughout the day up until the show goes on the air.

Q When you begin drafting a script, do you know what talent it is going to involve?

A For the most part, yes. We know our main-event talent, or the main-event talent that we want to feature. Because our business is very unique. We know where we are going for pay-per-views. We have right now 15 pay-per-views scheduled in '08. It is either 15 or 14. We were at 16. So that is roughly a pay-per-view every 3 weeks.

That is where we make a lot of our money. So what we do is we gear toward the pay-per-view. So we know where we are headed for pay-per-views, long term. And then we back into the story writing to get into those pay-per-views.

So if we know we have a 3-week promotion and we know our main-event match is -- I will just say two superstars. I am not sure how familiar you guys are. But say it is Randy Orton versus John Cena. We know we have 3 weeks to make that match as compelling as possible to hopefully intrigue the buyer to want to pay to see the match. So that is what we try to do.

Q And who comes up with the list of talent for a given match?

A Well, it is not necessarily a list of talent for a match. The way that it is determined is we have our main-event players, the guys who are the most -- in our business the parlance is "over," which means the most respected, most -- "respected" is

the wrong word because sometimes they are bad guys and they are not respected at all. But the ones people really want to see.

Mr. McDevitt. Just for the record, you mean "bad guys," script-wise.

Ms. Levesque. Yes, yes. Thank you. Within our vernacular, we have "babyfaces" and "heels," babyfaces being the good guys, heels being the bad guys.

Mr. McDevitt. Would you like to guess which side you guys are on?

Mr. Leviss. I will wait for the script.

Ms. Levesque. I am not writing this one.

So, yes, so, basically, the main-event players are the ones who draw the most money, the ones the people want to pay to see either win or lose, depending on their role.

Mr. Leviss. Sure.

Ms. Levesque. So we try to base our pay-per-views, obviously, around the guys who are going to draw us the most money, around our main-event guys.

BY MR. LEVISS:

Q Okay. Are the talent involved in developing the script?

A They are involved in their individual storylines. And, again, the main-event talent; not so much the lower-level talent. But main-event talent are called. We talk to them about the ideas we have, especially for their program, which is what that 3-week window would be.

Again, I am sorry to use the parlance of our business, but the program would be the 3 weeks leading up to the pay-per-view and sometimes beyond, because we do have so many pay-per-views, we have to book the same match. And we have to make the stories different within each program, which is challenging in and of itself. So the talent do like to contribute.

Q Uh-huh.

A And quite frankly, it is a better product when they do, because, you know, the talent are engaged and they are involved in the storylines. Sometimes it is their ideas. And, inherently, they perform better when it is their idea.

Q Okay. Before I get too deep into this -- and it is actually a fascinating process -- I should find out a little bit more about your other responsibilities.

A Okay.

Q Talent relations?

A Yes. Basically, John Laurinaitis is the ex-VP of Talent Relations, and he now reports to me. So I now basically oversee John and all of his responsibilities, which include developmental talent, our developmental talent system; they include booking all of the travel for the talent; the third-party appearances for talent, if talent are involved in any marketing or promotion outside our company or within our company. If talent are doing movies or any outside projects, it all comes through Talent Relations.

Basically, anything and everything talent-oriented -- talent contracts, et cetera -- all comes through Talent Relations.

Q And before John Laurinaitis was involved, did you oversee that process directly?

A No. John oversaw it, and he was the sole person in charge. And then it was deemed that John needed some management.

Q I see.

A So that is where I came into play.

Q And around when did that happen?

A That was about a year ago.

Q And your third area of responsibility was live events?

A Yes. Live-event -- it is actually two separate departments. Live-Event Booking is the actual booking of arenas around the world for our shows, because we have, God, over 300 shows, easy, a year.

Q Okay.

A And internationally, globally, everywhere. So it is the actual physical booking of those buildings.

And the routing is just a nightmare, because we also have not only our televised shows every week, but we also have a lot of nontelevised shows.

So we tour our two different brands. Raw tours Friday, Saturday, Sunday, Monday in America, domestically. And when we do international, it is different. SmackDown/ECW, we combine those two brands for touring. They tour Saturday, Sunday, Monday,

Tuesday. The live show for Raw is Monday. The live show for SmackDown and ECW is Tuesday. And ECW's live Tuesday; SmackDown airs Friday. But it is pretty much live to tape.

So there is a lot of arenas, a lot of booking.

And then the Live-Event Marketing portion is the promotion of those buildings, the promotion of the event.

Q Promotion of the buildings, you said?

A Yeah, promotion of the event at those buildings.

Q Okay. Is that basically a summary of your responsibilities? Not that it is not enough, but --

A I would say so.

Q Okay. And what aspect of your work changed? You said that your title changed over the last few months. Is that because you acquired new responsibility?

A Yes. Because the live-event portion is new. It's a few months old. And now my title is just so long that they are looking to change it.

Q And prior to that change, were you working primarily in creative writing and talent relations?

A Yes.

Q Okay. Great.

Outside of those areas, are there any other significant responsibilities you have had in the company in your time since '98?

A Nothing really significant. These are my most major

roles.

Q Okay.

A I mean, I suppose switchboard operator is vital to the company.

Q It would break down if people couldn't call.

A I still have extensions memorized.

Q I'm sure.

You mentioned Mr. McMahon. Tell me about how your responsibilities and your decision-making authority are, in relation to Mr. McMahon?

A I report to Mr. McMahon. I call him Vince in business, so please don't be deterred by that. At home he is Dad. And Linda is the same way; in business she is Linda, and at home she is Mom.

Q Understood.

A But so, I do report to Vince. So a lot of my, you know -- I am certainly free to make decisions, but if it involves a major decision within the company, I will pretty much run it by my boss and get the okay or the nay. So, in essence, I guess, to answer your question, however normal corporations work, I have to run, you know, my decision-making through my boss.

Q Do you report to anyone else besides Vince?

A No.

Q You spoke a little bit about Raw, SmackDown and ECW. First of all, does ECW stand for something?

A Extreme Championship Wrestling. But we are in the process of changing the image.

Initially, before we bought WCW, actually, before it almost went bankrupt, in the '90s, in the end of the '90s, there was a lot of competition within our organization. There was WWE -- it might have been WWF at the time, I forget -- and there was WCW, and then there was a fledgling group called ECW. And WCW was sort of the alternative to the big league wrestling. They used a lot of hardcore tactics, a lot of blood, a lot of thumb tacks and barbwire and all this bizarre stuff.

And we are looking to change that image. We own the brand. It had a cult following. We are looking to capitalize on the following but change the product. So we are in the process of doing that.

Q Okay. How did the other divisions differ? Tell me about Raw and SmackDown.

A Raw and SmackDown, the main difference between the two is the talent. You can only see certain talent, for the most part. There are some caveats to that. But for the most part, you can only see certain talent on Raw, which airs on the USA Network Monday nights, 9:00 to 11:00, and you can only see certain talent on SmackDown, which airs 8:00 to 10:00 on the CW Network.

Q And who determines how talent is divided among the divisions?

A The writing staff and Vince.

Q And how do you make those decisions?

A Well, it just depends creatively on where we want to go. A lot of it -- like, for example, if -- I should backtrack for a second as well.

We have a draft. And we have had a draft semi-annually, we have had it biannually, we have had it a number of different ways. But this draft enables us to have talent cross over to the different brands. So it is a creative loophole, if you will, to get our talent over to the other brands and engage viewer interest at the same time.

But so, if you are looking at these programs that I was talking about --

Q Uh-huh.

A -- say Randy Orton is a main-event guy who draws a lot of money. You know, you want to feature Randy Orton on a certain show, but he has wrestled against almost all of the other good guys. Well, now you have to do something, because Randy either needs to go to another brand or you need to bring over some new blood to face Randy.

So that is part of our decision-making process, to keep the programs fresh and interesting so the viewer will want to keep seeing them.

Q And do you need a new draft to bring him over, or can you bring him over, I guess, mid-season?

A It depends. The cleanest way to do is in the draft



show.

Q Uh-huh.

A But if we need him, if there is an injury and we need somebody to make a jump, we certainly creatively get around it.

Q Are there any other ways that talent are brought between programs or between divisions?

A Yes. Again, at WrestleMania, which is our Super Bowl of pay-per-views, we often have cross-promoting matches. So you might have a guy from Raw versus a guy from SmackDown, or girls.

And when that happens, it actually increases our viewership, because there is roughly 70 percent -- it might be a little more now -- are nonduplicated viewers for each brand. So now if you have a storyline that is on both brands, you get that much more audience intrigued in the storyline and wanting to pay to watch WrestleMania.

Q Nonduplicated viewers, you mean a unique audience?

A Yes.

Q Okay. What are the, sort of, target audiences for the brands?

A Well, it is funny, because Vince has never taken a stance of we only market to 18 to 49, or we only market to, you know, whatever it is. Vince's feeling and his company philosophy has always been, well, we are a cross-section of Americana.

And if you come to one of our live events, that is what you see. You see some teenagers, you see grandfathers with grandsons,

you see grandmothers with granddaughters, you see college kids, you see all different walks of life. And that is really what our product is.

Our network partners promote to the -- and they sell, because they sell their own advertising -- I believe it is the 18 to 49 demographic.

Q Uh-huh. But when you spoke of the viewers, I am blanking on what your phrase was, but sort of the unique audience --

A Uh-huh.

Q -- how do you make that assessment? You must have some criteria to determine, you know, who is watching SmackDown, who is watching Raw.

A Again, it is unusual. I would say we pretty much go with what the network wants us to do. So, for the most part, we target 18- to 49-year-olds, but, really, we listen to our audiences.

Our audiences are like a live question-and-answer period right in front of us. It is a live focus group every night we have a show. Our fans tell us what they want, what they like, what they don't like.

And that goes from what the product is in the ring to out of the ring. They are buying T-shirts, they are buying merchandise. We have people on-site asking questions. So we have the ability to get a lot of information from our fans.

And, again, we are not only targeting the 18-year-old male when we are asking those questions. We are asking all of our fans.

Mr. McDevitt. I think you wanted to ask her how she determines the nonduplicative nature.

Mr. Leviss. Thank you. I was thinking --

Ms. Levesque. That is through our marketing research.

BY MR. LEVISS:

Q Is there crossover of talent from ECW to Raw or SmackDown?

A On occasion, because we are trying to make that ECW brand stronger. It currently airs on SciFi on Tuesday nights, live at 10:00, and that is not a well-watched network. So if we give the stars from ECW exposure on the other brands, it gives more interest. Hopefully, we will get some of our bigger audiences to watch the SciFi Network.

Q So there is crossover, but --

A There is some.

Q -- it is less frequent than --

A It is less frequent. Actually, right now we have a storyline going where the ECW general manager and the SmackDown general manager have struck a deal, and they are currently cross-promoting. So it is more SmackDown and ECW cross-promotion.

Q Okay.

A But we don't feel that conflicts with our WrestleMania

storylines -- it gets very complicated -- because it is not the main-event guys, for the most part, involved in those stories.

Q How do talent find out that they are going to move between divisions?

A Often either myself or the lead writers or Vince will notify them -- or John Laurinaitis will notify the talent.

Q Do they have any say in the decision?

A Certainly. If someone really has a problem with it, you know, you can't force someone to do something that is against their will.

Q Sure.

A So they do have a say.

Q Do the talent typically care about, you know, which division they are featured in?

A No. There was only one issue that we had, and that was with a top star who had on Tuesday was his religious day with his family. He is a born-again, and I am not sure of the right words. Those are my words.

Q Sure.

A So he is very, very religious, and he felt that he could not do the Tuesday show because he needed to be at home with his family. So we did not make that switch, even though it would have really helped our product.

Q Is there a financial difference for the talent in appearing in a match for one division versus another?

A No.

Q I guess I sort of asked you this, but who is part of the process of determining whether to switch someone over? It sounded like it was you, Talent Relations, the rest of Creative Writing and Vince?

A Yeah.

Q Anybody else?

A No. That is it, for the most part. And talent.

Q And the talent themselves?

A Right.

Q Okay.

A And it is more of the main-event talent, you know, that speak up and that we solicit more ideas from, in terms of creative, et cetera.

Q Roughly, what percentage of your talent qualifies as main-event talent, in your view?

A I would say probably about 30 percent. Maybe a little less, maybe 25.

Q And those are sort of the headliners?

A Yes.

Q Are there any other ways you have of distinguishing among the remaining 70 percent or so of the talent?

A What do you mean?

Q Well, I mean, do you have any other terms for them? Is it just the main-event talent and the rest of the talent, or are

there other --

A You will often hear -- well, you won't, but in my business you often hear the parlance of there is main-event and there is mid-card.

Q Okay.

A And mid-card would be, you know, what it sounds like, middle of the card. And then the other -- there is no lower end. So there is, really, I guess it is like an "other" category. We really don't have a term for them.

Q How does talent get to become main-event talent?

A Basically, hard work and perseverance and overwhelming the audience. It is really up to the talent.

Stone Cold Steve Austin tells this story all the time. I don't know if you are familiar with Stone Cold, but he was probably one of the biggest superstars that we ever had, bigger than Hulk Hogan. I am sure you have heard of Hulk Hogan.

Mr. McDevitt. Hulk would disagree with that.

Ms. Levesque. Of course. But Stone Cold, I mean, huge.

At any rate, Austin, when he first came in, was Stunning Steve Austin, not Stone Cold Steve Austin. And he was -- actually, when he first came in, he was a character called The Ringmaster, which was not getting over, as I explained to you before. The crowd wasn't into it. They didn't really care.

BY MR. LEVISS:

Q Is he a good guy or a bad guy?

A At the time, he was a bad guy.

Q Okay.

A But they didn't care to boo him either. They didn't really care if he lost. They didn't really want to -- it was our worst-case scenario.

And Steve was sitting in the back, and he was with Vince, and he was watching another match. And he said, "You know, that kid out there, he has really got something. You should push him," which is another parlance of our business, which is, you know, putting someone in that main-event spotlight.

And Vince looked at Steve and he said, "Well, I will give him all the opportunity in the world, but it is up to him. He has to do it on his own."

And Steve always says that that conversation clicked something in his head, because from that moment on, he changed his character. He knew it was up to him to make the difference, and that is what he did.

Q Uh-huh.

A And Austin rose in the ranks. He was a real self-made superstar. We gave him opportunity, but he took the ball and he ran with it.

There is oftentimes -- because we need to build talent along the way. We need more main-event guys. You know, we are constantly trying to cultivate more main-event guys as part of our developmental system. We want everybody to be a main-event guy.

It means more money to all of us.

Q Sure.

A So we constantly give the opportunity. It is just, who is able to take the ball and run with it?

Q What can talent do to improve the character? I mean, if it helps, you know, you can use Steve Austin as an example. What does he do that makes him a stronger character?

A Well, a lot of it has to do with charisma, which is the "it" factor that you can't teach, that you are either born with or you are not born with. And that is basically the ability to connect with the audience.

When someone walks out on that stage, they either connect with the people or they don't. If you walk out on stage and nobody cares and you don't have any presence, you are never going to be a main-event guy. But if you walk out and you make the people notice you, you can be a main-event guy.

You really don't even have to be a good wrestler. Hulk Hogan was a terrible wrestler, and he still is.

Q For the record, I am sure he would disagree with that too.

A I am sure he would disagree with that. I forget this is all public. But, you know, he was. He was a terrible wrestler. But what an incredible psychologist and what an incredible charismatic person. There is no denying Hulk Hogan is one of the biggest stars in the history of our business and will always be



perceived as such. But he was not a great wrestler, not a great technician.

Q What makes a great technician, a great wrestler?

A The craft of wrestling itself, which is more mechanical than it is showmanship.

Q How much of that is up to the wrestlers, and how much of it is scripted?

A The actual mechanics of a match?

Q Uh-huh.

A It depends on the situation. For most main-event talent, they have been around a long time, they understand how to do what they do. They have honed their craft. They are masters of it. There is very little input from anybody else. For the most part, it is, "Okay, here is who we want to win, and here is how we want you to win."

Because, for the most part, every superstar has a finishing maneuver. Like, for example, Stone Cold, it was the Stone Cold Stunner. And, you know, the audience knew if you were hit with the Stone Cold Stunner -- I cannot do the move while I say it -- then you were most likely going to lose.

Q Okay.

A So it is a ride that the audience gets taken on.

And the art of wrestling itself is the ability to tell a story in the ring without any words at all, with your body and your face, and to make the people care so much that they want to

either see you win and overcome the odds or they want to see you lose. And that art, it is truly an art, the ability to take the audience on that ride.

Q And so, I guess, generally, how much of that ride do you and the creative staff direct for the wrestler?

A The creative staff, very little. We have on the road what are called producers. They have also been called agents. They are one and the same. And they are former stars in our business and former professional wrestlers.

Q So are they talent?

A They are not talent.

Q Okay.

A What they do is they help guide a match. So they speak with the talent ahead of time. Basically, they are getting the talent to talk, to get their ideas out.

Again, the main-event guys know much more what they are doing than the younger guys. And they say, "Okay, well, let's help you out here. And you are stuck in this part of your match." Because, again, there is pretty much a format to a match. And you can switch it up and change it, but you have a beginning, a middle and an end, like any story. And it is helping the guys get started, helping them in the middle and helping them get into the big finish, where you want to take people on that last go 'round.

Q Sure.

A But the producers are much more involved in the matches

than the writers are. The writers aren't really involved in that.

Q And when do the producers get involved in the process?  
Just before the match?

A The producers are e-mailed the shows over the weekend, but, again, the producers are also working those live events. This is also where the producers' role come in. And the producers also report to Talent Relations.

So the producers, they are still also called agents on the road, and there is a head agent on the road. And they are basically in charge of all the matches, all the story-telling that happens on the road that is nontelevised. So they also have the ability to work with this talent in their matches before -- because, for example, you might have a pay-per-view match and a live event prior to getting to the pay-per-view to get them to work their kinks out, what works, what doesn't work, that kind of thing.

Q Uh-huh.

A So producers are involved pretty much at the ground level.

Q Now, for talent that needs more direction, could you actually script all of the moves of a match? I guess, would the producer do that?

A I do not believe that that is feasible.

Q Okay.

A I don't know of any situation ever where someone had

every single move scripted in a match. I suppose anything is possible.

Q Uh-huh.

A But I would highly doubt that that would be possible.

Q Because?

A Because it is a lot to remember. And because the audience tells you what is working and what is not working. And if I grab Jerry and I put him in a headlock and the people aren't responding, I have to change on the fly.

Q He would probably respond if you did that.

Mr. McDevitt. They would probably root for that.

Ms. Levesque. But, you know, we have to change on the fly.

And that is the art that I am talking about, in terms of the match. If you were following a formula and the people weren't with it, they don't care to watch it, you know. And we never want someone who doesn't care. We want you to care one way or the other. Either you love it or you hate it. Great. But don't be ambivalent. That is the worst.

Mr. Leviss. Okay. Makes sense.

Mr. Cohen. Could I just ask a quick question?

#### EXAMINATION

BY MR. COHEN:

Q This conversation you described between Stone Cold Steve Austin and Mr. McMahon, when did that conversation take place?

A You would have to ask Vince. But I really can't venture

a guess. I mean, I would say right before Stone Cold really started to take off.

Q And that was? When did he start taking off?

A Late '90s. So I would guess that conversation was around '96. But, again, that is a pure guess on my part.

Q Okay. Thank you.

I am sorry, one more follow-up here. Can you walk us through a very quick description of a schedule of a typical wrestler? You alluded to it, but, I think, in a little bit of detail, can you sort of give us a Sunday-to-Sunday perspective on a typical wrestler's schedule?

A Sure. Our shows tour, although not every wrestler performs on every show. So that is important to know.

But the basic touring schedule when we are domestic is Raw tours Friday, Saturday, Sunday, with the live show on Monday. SmackDown and ECW tour together. They tour Saturday, Sunday, Monday, with the live show on Tuesday.

Now, when we go internationally, there is a period of time off prior and there is a period of time off after, but we try to extend our international tours, obviously, so we can stay further away for a longer period of time.

Q And on the 3 off days, do they also have responsibilities to the company? Do they make promotional appearances or --

A On occasion they make promotional appearances, but it is

all looked at to make sure that no one works too much.

For example, John Cena, our top superstar, who is booked the majority out of anybody, last year worked 161 days. So when you look at that in the grand scheme of things, it doesn't seem like too hard of a schedule. But it definitely is, you know, a tough schedule.

Q Do you have informal guidelines on how many days talent can work in a month or a year? Do you have formal guidelines?

A Informally, some talent, they have dates that they cannot work more than. But we always look at that, and we never really hit that barometer. So certain talent do have a limit, a cap on the number of days they can work a year in their contract.

And other talent -- again, we actually -- some talent wish they could work more, because the more they work, the more money they make. But with the roster the size we have, we just can't feature everybody all the time.

#### EXAMINATION

BY MR. BUFFONE:

Q Do you have a running count in your creative meetings of how many days talent has worked?

A Well, it is not the Creative, because storyline-wise someone might be on TV, but if they have had a particularly hard run, you might give them the live events off that week. So it is really more of a Talent Relations call.

And yes, if someone -- for example, Chris Benoit came to us

and said that he was having a very difficult time and he needed time off for home. And so Talent Relations made the call, and Talent Relations told Creative Writing we are not going to have Benoit for 4 months. So no problem.

Q Does Talent Relations track each wrestler, how many days they have worked that year?

A Yes.

BY MR. LEVISS:

Q How do you determine which of the talent to put in a pay-per-view event?

A Well, again, we always want to have our main-event money players. And then primarily it is who are we building, you know, who are we building to hopefully have in that main-event spot in years to come. We want to make sure we feature the people that we believe have it and start the building process.

Q And "it" is, sort of, charisma?

A It is the total package, yes. It is the charisma. It is the ability to take the audience on a ride. It is hopefully some wrestling ability, because you can't -- again, to use the parlance of our business -- shit the bed when you are out there. Excuse me.

Q It is a business term, I understand.

A It actually is, believe it or not.

But if you have a terrible match out there, you know, basically that is not good for your career either. You have to

have some wrestling ability.

Q Okay. And, again, does it make a financial difference to the talent whether they appear in a pay-per-view versus another match?

A Absolutely. Absolutely. I am sorry, let me -- I answered before you finished speaking.

Q No, I was finished.

A If they wrestle a pay-per-view versus a TV?

Q Yeah.

A Yes, they make more money on a pay-per-view.

Q Can you quantify that?

A It depends on the spot. If you are a main-event talent, you make significantly more.

And it all depends on what the company makes. And the talent make a percentage off of that. So it depends on what the buy rate is. There is no fixed amount of -- because you don't know what the pay-per-view is going to draw.

Q Sure.

A We always hope it is going to draw a lot, but it doesn't necessarily.

Q Can you just give me an example for comparison purposes?

A Of what?

Q Of the difference in what a talent makes on a pay-per-view versus a TV event?

A Sure. A top-level talent could make anywhere from 150-



to 200- on a pay-per-view. And then on a TV, it is significantly lower. It would be more like 10-.

Q Okay.

A And, again, those figures are very rough.

Q Sure. I understand.

A And WrestleMania, our Super Bowl, talent can make even more than that.

Q How high can that go?

A Again, it depends on the buy rate.

Q Uh-huh.

A But it can go as high as, I think, a million. But, again, I don't have those figures in front of me.

Q Okay. It is the Super Bowl, after all.

A Right. And that is the top top that I am giving you.

Q Sure. No, I understand.

Sort of moving to a slightly different topic -- is there anything you wanted to cover?

Ms. Safavian. No.

Ms. Despres. I actually have just one.

#### EXAMINATION

BY MS. DESPRES:

Q What is the average professional life span of someone who is a main-event wrestler? You know, how long do most people last as main-event? Ten years, 5 years?

A It all depends. Again, like, for example, Ric Flair is,

I think, 54 years old and he is still wrestling. But the average life span, I know we did this research, I just honestly can't remember.

Q And by "life span," I mean professional life span.

A I know what you meant, career span. And we did that research, and I just don't want to misspeak. But it does vary.

Q Okay.

A And I can get that data to you. I just really don't want to misspeak.

Q That would be great. Thanks.

BY MR. LEVISS:

Q Are you familiar with what a typical contract looks like for talent?

A Yes.

Q Can you describe the main provisions in a typical contract?

A Sure. It would be, you know, the money.

Q Uh-huh.

A A lot of times it is the number of days that you work.

Q Okay.

A It would be your merch ratio, what the split is, which our standard is -- I just did this the other day. 25-10-10, I think, is our standard. But, again, don't quote me on that. I have to get that.

Q And what would those numbers mean?

A It is 25 -- the three categories: One category is licensing, one category is merchandise, and the other category is, you know, WWE merchandise.

Q Uh-huh.

A And, again, I could get you much more specific information. I might be misspeaking a little bit, but that is in general the split.

Q But the numbers you gave in that example would be the percentage that the talent receives?

A Yes. And let me just backtrack for a second, because I think I can get to a bigger question.

Q Okay.

A The talent participate in all sources of revenue in the company. So a talent contract reflects a lot of that.

Q Okay.

A And it will reflect their participation in each of the streams of revenue. And that was something that Vince implemented since, you know, way before my time.

And it was one of the things that was very different than what promoters did at that time. Our business, if you go back, used to be regional. There was the northeast territory, there was the southeast territory, the midwest, the northwest. You know, it was all over the place.

Q Uh-huh.

A And with all of these different territories, my father,

Vince -- sorry -- had a vision -- I can call him my father -- but he had a vision. And his vision was to have one company and make it global and get sponsorship. And so what he did, much to my grandfather's chagrin -- because my grandfather didn't like to rock the boat, but my father had a vision.

So, ultimately, when my dad bought the company from my grandfather, that is what he did. He went into each individual territory and basically invaded. And he wound up buying out all of the other territories and creating one big global brand.

Now, we did have one major rival, again, more in the late '90s, which was WCW, to a much smaller scale ECW, but WCW was a part of the AWA, which was a territory in the past. And they held onto their name. It was the one territory that Vince didn't buy or couldn't buy, whatever the story is.

Q Okay.

A And so, at any rate, when Vince took the company global and made one big company, he wanted to make sure that all the talent were treated as fairly as possible. So he said, okay, all of these streams of revenue that we have, we are going to have the talent participate in it, those streams that they are involved in.

Q Okay.

A DVDs they receive royalties from for their appearances. Merchandise, whether it is WWE-produced or whether it is a licensed good, which is what I was referring to with the split --

Q Uh-huh.

A -- they receive a portion of the income.

Q Can you give me an example of licensed or WWE-produced?

A Sure. We have various licensees that produce a lot of T-shirts that you will see.

Q Okay.

A Like the T-shirts when you walk into K-Mart and you see a lot of WWE merchandise, a lot of that is licensed products. And you can tell by the tag that it is not a WWE product. It is a Hybrid T's product, or it is a Fruit of the Loom product, which -- we don't have a deal with Fruit of the Loom, but I am just saying that would be a licensed deal.

Q And WWE would receive a portion of that or a fee?

A WWE receives a portion. The talent receives a portion, as well.

Q How about the Hulk Hogan action figures?

A Action figures, as well, they receive royalties. Hulk Hogan is a little different. His deal is a little different. He has been around a long time. I think Hulk owns all of his rights.

Q Do contracts for talent differ generally, or is it just an individual superstar can negotiate his own terms?

A We have standards that really are prevalent in the majority of the contracts. But, again, that top-level superstar, they will vary little bits. Not very much.

Q Okay.

A There are no big, huge variances between the contracts.

Q Are there other, sort of, main provisions in the typical contract? You talked about money, number of days, merch ratio.

A Travel.

Q What would it say about travel?

A If someone wanted to be a first-class traveler versus a coach traveler. I mean, that is not a major provision. It is just one that comes to mind.

Q Anything else?

A Those are really the main ones. I would say the money, first and foremost. I am sure I am forgetting some.

BY MR. COHEN:

Q Are there other contracts for other talent, for referees or managers? Do those differ in any significant --

A Dramatically, yes. Referees don't participate in the revenue, for example, of a T-shirt because they don't have a T-shirt. Referees have a booking contract, which is similar in terms of it protects the company should something happen to them in the ring, but is different in terms of the monetary.

I would say mainly the money is the biggest difference in their contracts. But, again, I am not legal, and I do look at things from, you know, 50,000 feet. So I don't want to misspeak in terms of the details.

Q Sure.

BY MR. LEVISS:

Q Are contracts negotiated or renewed annually?

A No, it depends on the term of the contract. For example, if we have a 3-year contract, we will start renegotiating a year out. If it is a 5-year contract, depending on where they are at 3 years in, they are doing gangbusters and that talent really wants to, you know, up their minimum guarantee, then we will certainly look at that. If, 3 years in of a 5-year contract, we say, God, we really want this guy longer, we might negotiate at that point too.

Q What is the typical term, or is there one?

A Three to 5 years.

And talent also receive a minimum guarantee. So basically, their contract, the money is based on a minimum, but that is just, "You are guaranteed to make this amount." But they can participate in revenue with no ceiling. So they can make significantly more than what their downside guarantee is, and most of them do. So I just wanted to explain that that is the money that is negotiated. It is the minimum. There is no ceiling at all on what they can make.

Q Okay. Are any of the talent employees, or are they all independent contractors?

A They are all independent contractors.

Q And that covers the referees?

A Yes.

Q The producers?

A The producers are employees.

Q Okay. Because they are not talent. Okay.

We talked a little bit about, sort of, which talent are promoted, and I have some other questions about that. What are the characteristics, generally, that you look for in determining which talent to promote? I understand you talked about sort of the "it" factor. How do you make a determination about whether somebody is ready to be pushed, to use Steve Austin's term?

A Basically, it is when they start engaging the audience. I mean, when somebody walks out and engages the audience, we know we want to hire that person or we want to push that person or we want to give them the ball, so to speak. Because that charisma, that it factor is such a rare thing. That is why there is such a small amount of main-event guys.

And it is unfortunate. We wish everybody had this kind of charisma. I mean, The Rock had this engaging charisma. He is Duane Johnson. He has done other movies now.

Q Sure.

A He is Duane "The Rock" Johnson.

Q I know The Rock.

A Yes, okay. But he has this just unbridled charisma, and people just want to see him.

And so, really, I believe charisma is the biggest factor in determining who gets the ball and who doesn't.

Q And how often do you evaluate this? I mean, is it constant? Is it ongoing?



A It is constant. We even have developmental talent come up to our TVs, what we call "coming up." Every week, different talent rotate through. We will have a period of, you know, a few months where we are evaluating a small number of talent, developmental talent, and they wrestle before our television show. So they get to wrestle in front of the live audience that night. We are seeing how they handle the crowd, seeing what kind of charisma they have, how they handle themselves in the ring. And, you know, we can get a good feel for whether or not they are ready to come up.

Q Uh-huh.

A We also have those talent on the live events with the producers, who are, again, not necessarily grading them, but looking at them and making certain determinations and helping them along the way.

Look, you have this -- we have a kid right now in our developmental system who is doing an excellent job. He has this charisma, and it is great. And we want him on TV so badly, but he is just not ready yet. He just doesn't quite have the total package all together. But we have our eye on him.

Q Uh-huh.

A So he is honing his craft in the ring. Again, like I said, you can't throw a punch and have it wildly miss and, just because you have great charisma, people are going to like you. I mean, you have to still be at least decent in the ring.

So that is someone who has it that we are anxiously waiting to get our hands on.

Q And who, again, is the "we" in "we have"?

A The Writing Department. And the producers are involved in terms of the Creative, as well in terms of the wrestling portion of it. And if they have other ideas, it is great. They have been around the business a long time, and a lot of them know what works and what doesn't work fundamentally.

Q Do you meet as a group to talk about how a show went or talk about how particular talent is doing?

A We do. Once we get to -- I am sorry, were you done with your question?

Q No, that is all right.

A Once we get to a show -- like, say, Monday we are in Huntsville, Alabama.

Q Okay.

A So we meet and we have what is called the producers meeting. And we run through -- the writers and Vince and myself, John Laurinaitis, and Kevin Dunn, who is our executive producer, we all meet with all of the producers, and we run through the actual script of the show.

Q You do that on the road, or you do that locally?

A That is at the building we are going to be performing at that night. It is a run-through of the show before we do the show.

Q Uh-huh.

A And we basically work out the kinks. The producers will talk about what they want to see in the match, who goes over -- which means who wins -- what the finish is -- which is the same thing --

Q Okay.

A -- and how we get there. We will discuss the pretapes backstage. We discuss the promos that are the in the ring. The promos are basically the in-ring monologues, where they might involve other people. And we go through all the details of the show.

And after the producers have said their piece and given their feedback, then the writing team, Vince and Kevin and myself and John, all meet. And we go through any questions that might have arisen, what changes we want to make, if we want to put a graphic in, if we don't want to put a graphic in, if there are too many graphics, if there is too much footage, if there is not enough action, whatever. We look at the total picture as a whole and make the necessary changes.

Q Okay. And what about after the match? Is there any sort of --

A There is. The producer meets with the talent after the match. The producer who is responsible for that match meets with the talent after the match and goes through what worked, what didn't work, what were you feeling out there, you know, all those

kinds of things -- or congratulating them if they had a great match.

Q Okay. When Creative is meeting collectively to talk about, you know, which talent to promote, are there ever any discussions about the use of steroids or prescription drugs or illegal drugs? Do those topics ever play a role in the discussions about who to promote and who not to promote?

A No. The only time that it is ever an issue is when the writing team is notified by Talent Relations that a person is suspended. We know we have to get that person off television.

Q How is the writing team notified of that?

A They are notified by me or by John Laurinaitis.

Q How do you learn that somebody is being suspended?

A Well, in my new role now, as the head of Talent Relations, I am notified by Legal at the same time that John Laurinaitis is.

Q Uh-huh.

A So I find out that a talent is suspended. And that talent will either be suspended right that day, or if they are a champion, say, and we have to get the title off of them, we have to wait until the next TV, which is normally just a few days. It is never more than a week to get that title off of that person.

Q What do you mean by that?

A So, say, we had an example when --

Mr. McDevitt. Don't use names on drug tests. Hypotheticals.

Ms. Levesque. Okay. Thank you.

So we had an example where someone was going to be suspended, and they were a champion. And we found out I think it was on a Wednesday. Well, our shows were done Monday and Tuesday. So now we have this person we need to suspend for 30 days, but he has a title. And so what we did is, the next TV that we had, we had that person compete on TV so he could lose the title and then be gone.

There is certain cases where we are forced to do that because we are not professional sport; we are entertainment, and we have to continue our storylines. Even though it is a major change in direction for us, that is fine. But we at least have to get a title off of somebody.

Q Okay. Because whoever has the title is going to continue to compete in the story arc?

A Exactly. I mean, a lot of -- and it is not only with regards to the championship. That is just the best example I could give to you, since I am not sure that you are a fan of the product.

But when someone is involved in a major storyline, then, you know, we have to end the storyline. So we have to have that -- in some cases, we have that person compete on the next available TV, and then they are off TV after that.

The best-case scenario I can give you is when you have a champion and you need to get the title off of them, because a lot

of our programs and stories are written around being a champion, because, obviously, that is what everyone aspires to be.

Q Sure. Are there other scenarios where talent will continue to perform even though there has been a suspension imposed?

A There has been in the past, but where we are now, as of November 1, we started making the names public of those wrestlers who have been suspended. And since then, we are no longer having them compete after they do whatever they need to do for TV, if they need to do anything for TV.

Q And what about prior to November 1?

A Prior to November 1, we had I believe it was a few different periods of time. When this new policy was implemented in February '06, originally -- and, again, my facts might be a little vague, but this is how I remember it.

Q Sure.

A Originally, talent were suspended, and, you know, again, if they needed to be on TV the next day or the next week, then they were, but never longer than a week's time, and then they were gone.

Then there was a period of time where we allowed talent to work pay-per-views and TVs and not work live events. And they still had their 30-day suspension in terms of their pay was still suspended, but they were allowed to appear on TV at that time.

Q Uh-huh.

A Then we added live events, because we said, well, why should the product suffer just because this one person screwed up?

Q Right.

A They won't make any money. We would give them a per diem so they could, you know, get food and what not, \$200 a day, which is minimal compared to what they could make if they were working a live event. So they would, they worked the live event and TVs and pay-per-views. We continued to use them as a talent, but they just wouldn't be getting paid.

Q Uh-huh.

A And then, most recently, we said, okay, well, once these names become public, you know, we need to rechange our policy. We need to make sure that, okay, they are not going to be on TV. They might do the necessary program again the week after, but they won't be on TV now or pay-per-view or live events for the next 30 days.

BY MR. COHEN:

Q So, is the policy now, is it that -- if they have a positive test done and their name is going to be made public, and let's say they are a champion --

A Right.

Q -- you need to have them get rid of the title, do you hold that name, have them make the appearance necessary to get rid of the title, and then announce the suspension?

A I am not sure, because we haven't had the situation yet.

And it is something we need to determine. But we have not -- I am not sure.

Q So, in the past, can you give us a sense how many times have wrestlers who have been suspended appeared on shows?

A It is not a large number of talent. And I am not sure of the exact number. But I would say there is definitely a few.

Q And these involved cases where they were champions who --

A No, in that case, they were -- in that case, it was any talent that -- during that time, when we said why should the company be penalized for the actions of one person, during that time we had the discretion of whomever we wanted to use. So it was definitely more than one person. In that case, it was not a champion, because we were continuing to use that person.

That being said, during that period of time, we were not rewarding that person at all. They were not winning on TV. They were in losing efforts. Because, certainly, you don't want to reward that kind of behavior. And, again, they were not getting paid during that time.

Q Can you give us just a ballpark, I mean, how many times this has happened?

A During that period of time when we did allow talent?

Q Yes.

A I would say, ballpark, five, maybe less.

Q Okay. And what was the longest or the most frequent,



for any individual talent, do you know what the longest period of time or the most number of times they appeared during a suspension was?

A Well, say, a suspension is 30 days and they appeared every TV --

Q Uh-huh.

A -- I mean, that is at least four television appearances.

Q So were there cases where that happened?

A Yes, because we decided we were going to use them as we normally would; they just wouldn't get paid.

Q Okay. Did the talent have any concerns about this? Did they come to you and say, "Listen, I understand I have done something wrong, I am not going to be paid." Did they complain that they were being made to work without pay?

A Not at all.

Q Not one complaint?

A No. I think they were upset -- again, I am speculating -- but I think the talent knew that they screwed up.

Mr. McDevitt. I assume you are asking of any complaints that she knows of.

Mr. Cohen. Yeah.

Ms. Levesque. Right. Obviously, I can only speak to what I know of.

Mr. Cohen. I would presume, as the individual in charge of the talent, you would be a --

Ms. Levesque. I would imagine I would have heard.

Mr. Cohen. -- natural avenue for complaints.

Ms. Levesque. Right.

BY MR. LEVISS:

Q Does the talent who wins an event make more than the talent who loses?

A Not necessarily. But it can help build your character to win.

Q Because you move on to the next match?

A Yes. I mean, and it depends on whether or not you are in a building phase in your career or you are an established person. If you are an established person -- say, like Shawn Michaels is an established superstar. He is over. He has been around a long time. Whether or not he wins or loses doesn't really matter because the fans are just as engaged in him one way or the other.

But if you are a performer that is in the middle of the card and you either win or you lose, it can help build your character to get you to that next level. For example, if you have been on a losing effort, you are not going to be facing the champion any time soon. You know, even though it is entertainment, we have to build the facade of you win matches to face the champion.

Q Sure.

A So if, for example, a talent is suspended, and say we were allowing them to wrestle on TV during that time but we had

them in losing efforts, it was doing nothing to build their character.

Q Okay. How do you decide whether to make a particular talent win or lose an event you are scripting?

A It really depends all on the situation. And I would have to give you unique examples.

Q Sure.

A But, you know, for example we had -- say you had MVP versus Shawn Michaels, who I said -- Shawn Michaels is an established person. It doesn't really matter whether he wins or loses.

Q Uh-huh.

A And we are trying to build MVP to face the champion. We might have him beat Shawn Michaels, which is a huge victory over an established guy. MVP, I should say, is a newer character.

Q Okay.

A He is someone we are trying to build. He is in the middle of the card right now. We are hoping he is going to be a main-event player. So we might have him beat a main-event player to prove he belongs there. Give him the ball and see how he does. He will either engage the crowd or he won't engage the crowd. And we will be able to see how he can perform, if he can perform at that level. And if he does, great, then we have somebody else who is in that top, upper echelon.

Q And is that main-event player likely to complain about

the fact that you are writing in a loss for him?

A No. Most of our main-event talent understand how the business works because they have been through it.

Q Sure.

Mr. Leviss. Okay. Maybe it is a good time to break.

RPTS McKENZIE

DCMN MAYER

[10:23 a.m.]

BY MR. LEVISS:

Q Back in the previous round of questions, there was one point where I was asking you about what wrestlers could make on, you know, TV versus pay-per-view; and you gave me some rough examples. And just so that our record is clear, you said "10 for TV." You, of course, didn't mean \$10?

A No, no, no. I'm sorry. I meant \$10,000.

But again, that's on the very high end. I'm really not positive about these figures. After I said that, I was second-guessing myself.

There is a large difference between what you would make on TV and pay-per-view.

Q It could be as much as \$10,000 to \$50,000 to \$100,000 for the pay-per-view?

A Yes.

Q I'm not going to hold you to those numbers.

A Right. Just roughly.

Q I didn't want anyone to think \$10.

A Yes.

Q We talked a little bit about sort of the "it" factor and what makes a wrestler have it or not have it.

Is one component of that physical attributes?

A How do you mean?

Q I mean how the wrestler looks, strength, things like that.

A No, not necessarily. I mean we have a guy right now that is a really big, fat, bloppy guy. I mean, that's the only, really, way to describe him; and I shouldn't say his name now because it's going to be on record.

He is a spectacle. He is an attraction.

There are some attractions that we certainly look for in our business. I mean, we have a giant, a giant colleague right now. We have a midget -- a little person, sorry.

And pretty much it's just all different types. It's just really, you know, the specialness that they bring to the product.

Q Okay. Can you describe the typical champion right now, if there is something typical?

A Well, there really isn't much typical. I can describe our three current champions.

Q Okay.

A Randy Orton is -- you mean just physically describe him?

Q Sure. And their personality on screen.

A Well, clearly, the three have the "it" factor. They have that unbridled charisma. They just have an ability to connect with the audience.

Randy Orton plays a heel, he plays a bad guy; and he is the most egotistical, arrogant, obnoxious person you could ever meet.

Mr. McDevitt. You are --

Mr. Leviss. I understand you are describing the character.

Mr. McDevitt. He may be that way.

Ms. Levesque. We are strictly talking about his character. His character is that of the ladies, the gift to all ladies; and he is the best there ever was in the ring. He's young, he's good looking, he's arrogant and that's basically it. He is sort of a tall, leaner body type.

Our champion on SmackDown right now, Batista, is also a good-looking guy, and he is more of the -- more of the bigger kind of kick-your-ass-type guy. Excuse my language again.

Mr. Leviss. This is Congress. We can take it.

Ms. Levesque. I'm sure you have your own language.

So Batista is more of the kind of guy -- while Randy Orton is the kind of guy you want to pay to get his butt kicked, Batista is the kind of guy you want to pay to see kick somebody's butt. He is a knock-your-block-off-type guy.

CM Punk, who is currently our ECW champion, I would say is probably not your best-looking guy, but he has this straight-edge character. His whole character is that he doesn't do drugs, he's never touched alcohol, he's never done anything. And he is more of like a punk rock-type character, so he has the black hair and it's long; and he is a bit smaller -- he's not as tall as the other two guys -- and also a lean body type like Randy.

But that's his gimmick, his character is this hard-core,

straight-edge kind of guy.

Mr. Leviss. Okay. I get it.

BY MR. LEVISS:

Q Some witnesses have described to us that typical wrestlers look different today than they did in the '80s, for example, that they're more muscle bound today.

Is that a characterization that you would agree or disagree with?

A Actually, I wouldn't agree with that personally. If you look at some of the characters from the '80s, there were tons of muscle-bound guys, probably just as many as there are today, if not less today. I don't think in the '80s that you would have seen Rey Mysterio necessarily, because it seemed like -- it was almost the guys were maybe even a little bigger in the '80s.

Q Uh-huh. Why do you think that is?

A I don't know. This is just my memory as a child you know watching and maybe everybody seemed larger than life to me then.

Q Uh-huh.

A But -- so I can't really answer.

Q Do you have any opinion why about why they might have been bigger in the '80s than now?

A No.

Mr. McDevitt. First of all, it's not even a fact that they were. If you are asking for an opinion as to something that is



not even a fact.

BY MR. LEVISS:

Q It's your perception. Do you have any opinion about why that appeared to you that way?

A No. Again, maybe I was just a little kid, you know, watching; and everybody just seemed, you know, larger than life. It's the only, really, guess I can make.

Q Have you had any discussions at WWE with people about wrestlers today versus the '80s, specifically with reference to physical attributes, how big the wrestlers are?

A No.

Q Okay.

Mr. McDevitt. Hang on for just 1 minute.

Ms. Levesque. Yes. We did do a study which is the average weight of the roster right now -- not compared to the '80s, but the average weight -- gosh, and again I will have to get you the hard data -- but we were actually surprised; the average weight was far lower than what the average weight for an NFL player was. It was in the -- I think the high 100s, like 195 pounds or something like that.

It might have been slightly above that, you know; don't hold me to the specific number. But it was a dramatic difference between that of the NFL, which actually surprised me. But it just goes to show all the various body types that we really do have.

BY MR. LEVISS:

Q Why did it surprise you?

A Just because I thought our guys were bigger than that. You know, I mean -- but they're just not on the whole. The majority is -- there's a lot of different kinds of bodies.

Q When did you do this study or assessment or whatever?

A That was this year.

Q Uh-huh. What prompted that?

A Pretty much just fact finding about our talent. Just we wanted to understand more about, you know, our talent as a whole; and that's when we did this study where I mentioned before about the -- you know, the Courier spam, which I couldn't remember the date off the top of my head. But it's just a more comprehensive look at our talent.

Q Were there other issues considered in the study?

A No. I mean -- and a lot of this came about as a result of Chris Benoit. Chris is such a tragedy, but he did force us to look at our business in a different way. You know, our talent; you know, what are talent doing? How many of them have health insurance? How many of them have financial planning?

We really want to engage our talent and to be doing the best that we can for our talent. So Chris Benoit, while a tragedy, I think has helped in some ways because it's helped us look at our talent and how can we treat them better.

Q Whose idea was it to do this study?

A It was a collaborative idea -- I mean, Vince, Linda,

Jerry, I think, myself, John Laurinaitis. It was really a collective sort of feeling.

Mr. Cohen. Who received a copy?

Ms. Levesque. Pretty much the people I just named.

BY MR. LEVISS:

Q Who conducted the study?

A It was pretty much John Laurinaitis in terms of just facts, data. It wasn't -- you know, if we were asking a talent a question, then that was obviously through Talent Relations as well, but it was done through John Laurinaitis.

Q And did he have a questionnaire?

A No. Well, we had -- for example, if we're looking at how many talent have worked -- you know, "worked" is again another parlance, but how many days they actually performed. You know, we have records of that because we know when they were booked and when they weren't booked. So that's hard data that we just accessed and put together.

Average weights: We, you know, took everybody's weight. We always do take everybody's weight, but we took it again to get the most accurate weight, and we pretty much update annually, anyway, maybe biennially.

Q Did he interview them at all?

A No. But there was no -- well, I shouldn't say "no."

If you have a specific question, I can tell you if he had specifically asked that question of talent. One time we did

specifically ask questions of talent, if they had health insurance or not.

Q Okay. You'd mentioned financial planning, health insurance.

A Yes. Those were the two questions that we asked. I think those were the only two off the top of my head.

Q Was the focus exclusively on current talent? Did you look at talent previously associated with WWE as well?

A We did look at talent previously associated with WWE and what we looked at is, how can we help talent who may or may not have a drug issue.

Q Uh-huh.

A And what we did is, we implemented a policy where any talent that previously worked for WWE who was, you know, a regularly scheduled performer -- because there's some guys who came through for a cup of coffee, showed up one day and did something; we have to draw the line somewhere -- that we would pay for drug and alcohol treatment, should it be necessary for them.

Q That's the letter you sent out to, I don't know, 500 or so performers?

A Yes. Because, you know, we tried to look at a way of, okay, how can we help? What can we do as a company? And that was the best thing that we could think to do.

Q Okay. Are there other changes or policies that you made in response to what you learned from the study?

A There weren't really many changes to be made, other than we're going to be having more educational seminars with the talent to keep them more informed.

We were actually over half -- I believe it's actually over 60 percent have health insurance and have financial planning. But we're still going to be doing more educational seminars to help talent, you know, realize that it is of vital importance. We're looking at, you know, a number of different seminars that we could include to have talent be better prepared for the life of professional wrestling which is an unusual life.

Q Sure.

A Because it's on the road so much. There is no off season.

Q What's the typical retirement age, for lack of a better term, for a professional wrestler?

A You know, that was something else we found out in this data. And I cannot accurately say because, you know, the person who keeps coming up in my head is Ric Flair, who is 54 years old.

But there is an average and it's -- gosh, I just don't want to say. I don't want to misspeak. But I can get you the data so that you have the accurate numbers.

[The information follows:]

\*\*\*\*\* COMMITTEE INSERT \*\*\*\*\*

Q Okay.

Are you able to generalize about what talent typically does at the end of a wrestling career, what they move on to?

A I really can't. I don't know what people do when they move on.

Q So that's not something that was considered in the study?

A No.

You know, talking to talent on their way out, part of an exit strategy is part of the seminar that we were thinking is that -- you know, basically a life skills-type seminar is one of the things we talk about, which includes life after wrestling because not everybody's going to make it.

But in terms of what talent do afterwards, I'm not sure. I mean, I know a handful of cases, but not well enough to speak on an average.

Q How much daily contact do you have with the talent?

A At TV I have tons of contact. So every week, every Monday and every Tuesday.

Q And otherwise?

A And otherwise the random phone call here or there. I'm not involved as much directly with contacting the talent as my lead writers or -- for Creative, or John Laurinaitis may be for Appearances.

Q I guess -- of the pool of talent who are currently associated with WWE, what portion of them are in active circulation, performing regularly?

A Of the -- of our current roster?

Q Uh-huh.

A Well, not including the Developmental -- let me just make sure you are asking a specific question, Developmental aside, because Developmental has their own shows that they do.

Q Okay.

A But you are talking about performers regularly performing on Raw, SmackDown and ECW that are part of the roster?

Q What is Developmental?

A Developmental is our Developmental Territories. We currently have two where we're trying to basically groom the next crop of WWE superstars. They're independently owned.

Q Okay.

A But we do have some employees stationed there. They are affiliated with us.

Q Do they have their own names?

A Yes. OVW is one, Ohio Valley Wrestling and Florida Championship Wrestling is the other. One is in Ohio and one is in Florida.

Q And these are like the farm teams?

A Yes, basically.

Actually, I said it's in Ohio, but it's not; it's in

Lexington, Kentucky.

Q OVW is in Kentucky?

A Yeah. Don't ask. I didn't come up with the name. But Kentucky Wrestling -- I'm just kidding.

Q Okay. So Developmental has its own schedule and you are not involved in marketing or --

A No, I'm not involved in the marketing or booking of those talents. They are booked, and it's -- actually the way that the owner makes his money is by the shows that he runs with those territories. And it's great because the talent get the experience of working in front of a crowd.

Q Sure.

A You know, and they get that feedback of how the crowd's going to react to them. But it's on a much smaller level. They're allowed to screw up. They can try different characters, and it doesn't impact once they're on television.

Q How do people get brought up from Developmental?

A We have people basically watching all the time, and we send producers down to evaluate; and as well, the writers go down and give their opinions, probably on a quarterly basis. And in addition we have a liaison between the Writing staff and the Developmental systems, who goes once a month, right now as it stands.

And so we have constant feedback on who is doing well, who we have our eye on.



Then the next step is those three to four talents who we think are going to make it, that's when we start putting them on the live events and coming and wrestling before the TVs, as I was explaining before.

Q So what role, if any, do you play in bringing talent from Developmental to --

A I basically make sure it's happening.

Q Okay.

A And if people are slacking or not giving their feedback, you know, that's -- my job is to make sure -- okay, guys, who's the next person here?

You know, we've got to make sure that we're bringing them up. And, really, I'm more in charge of making it happen.

Q So will someone make a recommendation to you about the next three or four people?

A Oh, absolutely. We actually take collective feedback. And it is a decision by John Laurinaitis and I of who actually does come up to work those live events prior to the television taping.

Q Will you go watch that person or those people perform?

A I try my best. It's very busy at TV. But I do try my best, and I always assign somebody to be watching to make sure we get the feedback. And then typically we discuss it the next day in a meeting with Vince, because it's most important for Vince, for Mr. McMahon, to hear the feedback.

Q And so does he play a role then in the decision to bring someone up from Developmental?

A No. That's strictly John and I.

Q I was asking you about sort of --

A He could. Obviously, if he saw someone and said bring him, he's brought.

Q Okay.

I was asking you initially about your sort of day-to-day contact with talent. Putting Developmental aside for the rest of the talent, how much contact do you have with them? And -- well, why don't we start with that one?

A Okay. For the most part, I see them all every Monday and Tuesday or if there's a pay-per-view I see them on Sunday, those who are performing, those who are there.

Q Right.

A And you know, I pretty much see everybody. Whether or not I engage in a conversation really depends on what my responsibilities are of the day, because also at Television, I not only have my role as a TV, but I'm also a director/producer, and I work on the backstage vignettes. I work on some of the dialogue with the talent and, as well, I feed the commentators.

Q Uh-huh.

A So I have multiple responsibilities at TV.

So that's why I say, it depends on how much time I have to interact with the talent and whether or not I'm working with them

that night. If I have a pretape that I'm producing, pretape being one of the backstage scenes that you would see in our show -- it's either live or pretaped; that's why it's called pretaped -- then obviously I have more interaction with those talent because I'm working directly with them.

Q Sure.

How many people are we talking about in terms of talents who are actively performing?

A I would say probably around 30.

Q Okay.

A Each -- every Monday and every Tuesday.

Q And how many talent are there who are currently affiliated with WWE?

A Excluding or including Developmental?

Q Excluding.

A I would say about 150 total.

Q So roughly 30 out of the 150 are performing any given week?

A No. Thirty would be for the Monday night and then there would be more, probably more like 50 on the Tuesday night, because it's the two different shows.

Q Okay.

A And again it's very rough. But --

Mr. Cohen. If they're not performing, do they have to show up at the arena or event?

Ms. Levesque. Yes. Because we're not sure if we're going to need them or not. Because, again, a lot of times if a performer is not wrestling in a match, we still try to get them on the show so they have some exposure. So we might have them in a conversation backstage in a pretape before someone else walks into the scene, just to get them some exposure on the show.

The more exposure you have, obviously the better.

Mr. Cohen. Okay.

BY MR. LEVISS:

Q Do all talent in ECW, Raw or SmackDown come through one of the two Developmental?

A I'm sorry. Let me go back one second to answer your question.

We don't bring everybody on the roster to TV every time. We know who we want to use primarily, so there is a list that -- the writers are in communication with Talent Relations at a lower level than Johnny and I, and that's basically how we establish who we bring to TV and who we don't.

So it's not like there are tons of guys sitting around twiddling their thumbs, just to be clear.

Q I was asking if Developmental is the only way to get to ECW, Raw or SmackDown?

A For the most part because -- there's also what's called independent shows. And well -- I mean, so at any rate when someone is on an independent show, and say they catch our eye, we

will hire them to our Developmental system. That's actually how CM Punk came to us.

Q Is an independent show affiliated with WWE?

A No, not affiliated at all.

So there are some of these smaller shows, but they're not nearly territories like they were, as I was describing before. But there are independent circuits, and they run much smaller shows; they still wrestle in the high school gyms or, you know, in the smaller venues that you might remember, growing up.

Q Sure.

A So they still have those independent shows. And as well, there is still another competitor out there as well, too, on a much smaller scale. They're called TNA. There haven't been any examples yet, but we would be open to having a talent come to our show from TNA. And if they were ready, they would probably not go through the Developmental system, they would probably come right in.

Q And how does talent like that come to your attention?

A Well, we have scouts, you know; and we certainly have people who watch their programming. And you know contractually you are not allowed to contact a talent until they're -- and I'm not sure of the legal specifics of it, but -- you know, until their contract is up, but we might have people we have our eye on.

Q Uh-huh.

Are the scouts full-time employees of WWE?

A Yes. There's no scout person. It's different people that are employees that we would have scout, and they're in the Talent Relations Department.

Q All right. Is that something you ever do?

A No.

Q Is it something you have done in the past?

A No. I have watched different shows and said, ooh, hey, that person's interesting before. But I wish I had the time to do that; I just don't.

Q Do you interact at all with the scouts?

A Not normally on a personal level, but I might.

Q Uh-huh.

A But pretty much it's all through John, because they report to John.

Q And is John the one who instructs them and receives reports back from them?

A Yes. And I'm normally copied on the reports. If there's anyone of interest, I'm definitely copied, I'm kept informed.

And I might give a direction, you know, if I feel like there's someone I have heard about a lot from all different sources. You know, where are we on this guy? You know, are we available to bring him?

Q Do you know how John instructs them, you know, what sort of information he gives them about what WWE is looking for?

A Well, it's pretty much all the same mantra. It's, who is the crowd responding to? And if there's somebody, even if they're lower on the card, but if the crowd is going nuts for them, they've got it, you know, and so we want it.

Q Sure.

Are you ever in a situation where you are more specific about recruiting, you know, you would instruct a scout, Gee, we really need somebody who's kind of tall to fill a particular need or --

A I'm trying to think of a specific case.

Not that I can think of.

Q Okay.

A Because it'd all depend on the story. Like, for example, The Great Collie, we don't necessarily put him against a big guy -- you might want to tell the underdog stories -- you put him against a smaller guy, you know.

And quite often big guy matches, big guy versus big guy, aren't good anyway. They're typically not technically very good to watch.

Q Uh-huh.

A Because sometimes it's lumbering, and it just doesn't look like -- but that's -- I'm getting away, beside the point.

So at any rate I can't think of a specific case where we said, oh, let's hire a big guy, or, oh, we need a small guy or we need -- at some time we have said, we need more ethnicity in our show, so we may have had more of an eye towards a minority.

That's certainly something that we've looked at.

Q Are scouts given any instructions to inquire about steroid use or illegal drug use?

A No. And typically the scouts are not speaking with these talent. They're just observing the talent.

Q All right.

Do they ever speak with folks in the audience to gauge their reaction?

A Yes. But again there's no specific protocol for a scout.

Q Okay. Are you aware of whether any scouts have ever reported back that a potential hire was rumored to be a steroid user?

A No. Because then we wouldn't hire them.

Q Is that a matter of policy?

A No. It's just if someone -- you wouldn't want to bring in trouble. So it's, hey, there's this guy out there, but, oh, he's got a lot of baggage; okay, well, then we don't need him. Or, hey, there's this guy out there and people are going crazy for him. Great, do you know anything about him? No. But, you know, let's take a look at him.

So then we would take a look at him. And if the decision was made to hire him, he would have to go through our testing procedure. Because we now have precontract screening.

Q Uh-huh.



Do you know whether WWE has ever hired anyone who was a reported steroid user?

A Again, "reported" is really vague. I am not aware of any time that we've hired anyone that was a -- "reported," I don't know what you mean by reported. Like assumption?

Q I guess a rumored steroid user that others in the community have suggested was a user.

Mr. McDevitt. What community? Come on. That is almost impossible to answer a question like that.

Has WWE ever hired somebody, somebody in some community somewhere, rumored as a steroid user? Come on. That is so absurd you can't even answer a question like that truthfully. Somebody in Arkansas rumors that somebody took steroids and how is she supposed to answer that question?

Give her a specific factual predicate and she'll answer the question, but don't deal in rumor mongering for Christ's sake.

BY MR. LEVISS:

Q Has anybody -- are you aware of whether WWE has ever hired anybody after a positive steroid test?

A I'm not -- from what I'm aware of, no. And we did have a case just recently where someone was looking for employment. They tested positive and we did not hire them.

Q Okay. Do you have any interaction with trainers at OVW or Florida Championship Wrestling?

A Very little.

Q Does that mean any at all or --

A I get written reports from them that are sent to a number of us, you know, basically about how a show may have gone or the script of one of their shows. So I hear from them, but I have very little personal contact with them.

Q Uh-huh. And do you provide feedback at all in response to these reports?

A Only if I saw something that necessitated it. It's been very rare. On occasion I have, but very rarely.

Q Can you give me an example?

A I read a report that, you know, a particular superstar was doing really well; and I followed up with Johnny and said, Who is this guy? You know, Should we bring him up? That would be an example.

Q Sure. Do trainers in the Developmental leagues submit ratings of their wrestlers, submit to WWE?

A Their own ratings?

Q Uh-huh.

A In OVW we have -- well, there was. I'm not sure if we're still doing it, but they gave basically a grade. You could call it a rating system or a grading system, and it was on a scale of 1 to 10, and they were graded on attitude, work ethic and promo -- promo is the ability to speak, basically --

Q Uh-huh.

A -- and overall contribution to WWE.

Q Okay.

A And I think it was a 1 to 10 scale. And in Florida Championship Wrestling they have not been doing that.

Q And are all the wrestlers graded in that way?

A All of the wrestlers for OVW were, but not for Florida Championship Wrestling. And, honestly, I can't speak to whether or not they are still doing that practice because I haven't seen a report in a while.

Q How much importance -- or how important were those ratings in deciding whether to elevate a wrestler?

A They're part of an overall factor. But the trainers themselves are not -- you know, they're training technical ability, the trainers specifically, we do have people who go down periodically to work on personality and the ability to speak, et cetera.

But the trainers are training you how to bump, which is another parlance of our business, how to fall properly without getting hurt. So they give their grades on how they think they're doing promo-wise; and attitude they can certainly give us a good feeling on.

So it's really all taken into consideration: the trainers' feedback, plus the producers who go to see, plus the writers. It's really an overall assessment.

Q Uh-huh.

Are you aware of any instance where WWE elevated an OVW

wrestler whom the trainer graded poorly?

A I'm not aware off the top of my head. There may have been, because maybe his charisma was much better than his work, you know, and we decided to bring him up and give him a try anyway. Because again the trainers are not the only people we look at in terms of assessment.

Q Are you aware of any reports that OVW wrestlers -- let me try that again.

Are you aware of any reports of particular OVW wrestlers using steroids or illegal drugs?

A Unless they tested positive during our system and were suspended, I know that we -- I think we have had a couple.

But Developmental talent are not in my foreground as much because, again, I'm not working with them on a regular basis, writing storylines for them, so I'm -- I'm sure there are a couple of cases, but I cannot recall specifically.

Q But you would receive suspension information for Developmental wrestlers, as well?

A Yes, absolutely --

Q Okay.

A -- for both OVW and FCW.

Q Are they paid directly by --

A WWE? WWE plays for the talent. The systems themselves have WWE talent and then -- like, for example, OVW also has some noncontracted WWE talent, because they are pertinent to their

local promotion, the local shows that they put on. But when they're training, WWE talent only train with WWE talent.

Q Okay.

A You need -- for example, sometimes when you are trying to build a character, as I was saying before, those wins and losses do matter.

You have someone that you are investing in beat somebody who the crowd doesn't even know; it's just a body to beat. So that's where -- in a situation like where the Developmental territory has a non-WWE talent working for them, what they would do is have the WWE talent wrestle the no-name guy and the WWE talent would win. That's one of the ways that you build talent.

Q Okay. Have you ever -- have you ever told a WWE talent or prospective talent that they needed to be bigger or more muscular?

A No.

Q Okay. Any words to that effect?

A No.

Q Have you ever suggested to WWE talent or prospective talent that they should change their physical appearance one way or another?

A I told Beth Phoenix the other day that she should change her hair, because she looks too much like another female diva that we have. So that would be the type of physical appearance -- tattoos, hair, piercings, that kind of thing.

Q Do you know if anybody else affiliated with WWE has ever told a wrestler -- told talent or prospective talent that they needed to be bigger or more muscular?

Mr. McDevitt. Did she ever hear anybody say that?

Mr. Leviss. Do you know?

Mr. McDevitt. When you say "know," do you mean hear it?

BY MR. LEVISS:

Q Do you understand, when I ask you, do you have firsthand knowledge of whether somebody -- did you ever witness anybody associated with WWE make comment to WWE talent, or prospective talent, that he or she should be bigger or more muscular?

A I have never witnessed that, no.

Q Has anybody ever reported to you -- say, a talent or somebody else -- that a comment like that has been made to a WWE talent or prospective talent?

A No. The only time physical appearance has ever come into play is, I had to ask a diva to lose some weight -- which was very uncomfortable, by the way.

Mr. Leviss. No doubt.

BY MR. COHEN:

Q To follow up on Dave's question in slightly different -- have you ever told -- have you ever had a conversation in which you indicated that a particular talent, or prospective talent, would not succeed because they do not look a certain way?

A No.

Q Okay.

A Again, it's really not how you look. It's really your charisma. I mean, I know that's difficult to explain and it's just one of the greatest challenges to find people with charisma to perform.

But you can have -- you can be small and have a ton of charisma. You know, Chris Jericho right now just made a big return, and he is not one of the biggest guys on our roster by any means. He is wrestling in the main event. He just has this intangible quality.

BY MR. LEVISS:

Q Have you ever heard Vince McMahon make any comment to talent about whether they should be bigger or more muscular?

A No.

Q Has anyone ever told you that Vince McMahon made comments like that to talent or to prospective talent?

A No.

Q Do you know whether it's ever been a part of a WWE script or storyline that a particular talent should be bigger, more muscular?

A How so?

Q I don't know, part of the story arc, part of, you know, why a particular talent is successful or not. Does -- well, let's start with those.

A I just -- would you mind being more specific? I mean,

it's never been a part of -- I don't quite know how to answer your question.

Would you mind being more specific?

Q Well, I guess, does a wrestler's physical appearance, amount of muscles, does that enter into the WWE narratives at all?

A In terms of who gets on television or who doesn't?

Q No. In terms of the plot. I guess, the prematch story or anything that's going on in the ring.

A No. I mean, the only example I can think to give you of what you are looking for is, in one circumstance we did have a guy who is deemed to be more muscular and he was in a match with someone who is more muscular, so we had a bench press contest between the two of them as a part of a storyline.

So if that helps you --

BY MR. COHEN:

Q Are you familiar or have you ever heard the term "getting on the gas"?

A I have heard that term, yes.

Q And what's your understanding of the meaning of that term?

A Using steroids is my understanding.

Q Have you ever heard anyone refer to -- have you ever heard a conversation -- been made aware of conversations regarding individuals "getting on the gas"?

A No, not in terms of wrestling.



I have heard it in terms of body building, you know, "Oh, that guy's got to be on the gas." That's what I've heard.

Q I just want to clarify, when you were talking about your current champions a little while ago, you mentioned CM Punk and his image being a clean wrestler and somebody who doesn't do drugs, doesn't drink alcohol.

When was CM Punk made a champion?

A I'm really not sure. I would say within the last year. It was recent.

Q Was it following the death of Mr. Benoit?

A Yes, it was. Ironically, Mr. Benoit was supposed to become ECW champion that night, and he didn't show up at the pay-per-view because he was dead.

Q Creatively, was it a conscious decision to make CM Punk, this wrestler with this clean image -- was it a decision to make him the champion post-Benoit?

Mr. McDevitt. You mean, because of Benoit? The innuendo of your question, if it is the innuendo of your question, why don't you ask?

Mr. Leviss. He asked post. It wasn't a temporal question. It wasn't a loaded question.

Mr. McDevitt. There was a lot of loaded stuff in there.

There's no question he was made champion after Benoit died. Sequentially, that's not in dispute. But I think you are trying to suggest something in your question.

If you are, fine. Put it to her directly and ask it then.

Are you asking her whether he was made champion in response to Benoit?

Mr. Cohen. I guess I'm just asking generally, what were the factors that went into the decision to make CM Punk a champion?

Mr. Leviss. Because Punk is our most over Babyface on Raw. He is the guy with the most charisma, the most personality. He happens to have this straight-edge lifestyle, which makes him different, which might make him more of a fan favorite. So the fact that the fans are responding to him for whatever reason is why we made him the champion.

BY MR. LEVISS:

Q Are there any scripts that you can recall that have made use of or made light of the fact that a particular wrestler lost a substantial amount of weight?

A Not that I can think of.

Q Okay.

Aside from the company's Wellness Policy, how does Talent Relations discourage steroid use among talent?

A Well, the policy is pretty effective in terms of discouraging, you know, any drug use.

Q Okay.

A And I mean, aside from that part of the life skills seminars that we are going to be conducting, we'll certainly include education about drug use. But aside from that, we really

don't have that many issues with drug use. So there's not a big focus on, you know, speaking to talent on a regular basis about drug use, if that's what you are asking.

Q Sure.

No outreach efforts or anything?

A Not unless, you know, deemed necessary or if we suspected someone had a problem. But again, the Wellness Policy is pretty effective.

Q Have you ever been talent in the company?

A Yes, I have.

Q And when was that?

A I was a talent Monday night in terms of, I made an appearance. But I haven't -- I have wrestled in the past, but I haven't wrestled for over 2 years. So I make sporadic appearances. I was much more of a regular character in -- God, it was a little while ago now; I'm starting to date myself.

Someone actually -- it's ridiculous. I'm sorry, as an aside, when people came up to you, when I was this big, and they are older than you are, it's very insulting.

But, gosh, I guess it was mainly in 2000, like early 2000 that I was -- maybe late like '99 to 2004, I think, that I was more of a primary performer.

Q And were you a wrestler at that time?

A I wrestled on occasion. Again, my character was the -- I was a heel and I was the -- you know, the boss's daughter. They

called me The Billion Dollar Princess. And I basically was Paris Hilton before Paris Hilton became popular.

I was ahead of my time, only people didn't love me, they hated me.

Q Paris would probably say the same.

A But Paris Hilton was voted as a role model in Australia recently. It just baffled me. It scared me a little bit.

So -- at any rate, that was my character; so when I did wrestle, it was a big deal because The Billionaire Princess was wrestling. So I was never really a regular wrestler, but I wrestled maybe a total of 10 matches.

Q Okay. Over what time period?

A Since I made my first appearance, which would probably be '99 to, you know, now; but I haven't wrestled in a long time.

Q Okay. The WWE provided the committee with a number of case files for wrestlers who have been to drug rehabilitation.

Mr. McDevitt. Out of clearly redacted case file.

Ms. Levesque. What does "redacted" mean?

Mr. McDevitt. Names, identifying information is not provided.

Mr. Leviss. To protect individuals' privacy, that is right.

BY MR. LEVISS:

Q Are you familiar with, generally speaking, wrestlers who are sent to drug rehabilitation? Is that information that would come to your attention in the ordinary course of business?

A Yes. Currently, yes.

Q And how long has that been the case? How long have you been in a situation where you were typically informed of which wrestlers were being sent to drug rehabilitation?

A Now I'm required to be informed for about the past year. But prior to that, I was aware pretty much because I worked so closely with Vince.

Q And for, I guess, prior to that, back to what period of time?

A Probably 4 years -- 4 years, 5 years. Once I became a predominant member of the executive staff.

Q Okay. Aside from these situations, aside from when you were informed that a wrestler is going to drug rehabilitation, have there been other instances where you obtained firsthand information that an individual associated with WWE had used steroids or illegal drugs?

When I say "firsthand information," you know, that could be either because somebody tells you about themselves, you know, about someone they're in a position to know or because you see documentation of it.

A Can you just repeat the first part of the question?

Q Sure.

The question was, aside from the report -- and I'm sorry this is so complicated. But aside from the reports that you were informed of, that individual wrestlers were going to drug

rehabilitation, are there other instances where you have received firsthand information that somebody affiliated with WWE had used steroids or illegal drugs?

Mr. McDevitt. She has already identified some of those.

Mr. Leviss. Sorry?

Mr. McDevitt. She has already told you those.

Mr. Leviss. I'm not sure I follow you.

Mr. McDevitt. Well, she's told you about what they do when they get suspension notices for Creative.

Mr. Leviss. Sure.

Mr. McDevitt. Discussed a lot of ways. She's already identified.

Mr. Leviss. My question is, outside of the official --

Ms. Levesque. Wellness Policy?

BY MR. LEVISS:

Q The official reporting, the Wellness Policy?

A There has been one case I can recall where someone who had actually been to rehabilitation appeared to be groggy and drowsy and really out of it, and John Laurinaitis confronted that person and he said that, yes, he had taken some muscle relaxant painkiller, whatever it was, I can't recall the drug, specific drug. And that person was asked to leave immediately,.

Q And around when did this occur?

A Timelines are tough for me because so much happens in a year. But I think within the past year, maybe the past 2 years

that that happened.

Q Okay.

So that would be -- would that be after the Wellness Policy was adopted?

A It was definitely after the Wellness Policy, yes.

Q How about in the period between '96, when the prior drug policy ended, and the beginning of 2006 when the Wellness Policy was adopted?

A I don't have much knowledge during that period because I wasn't in the position I am in now where I'm working so closely with talent, et cetera.

So to answer your question, no, I don't know of any cases prior to --

Q I'm sorry. Finish your answer.

A That was it.

Q Were you not working closely with talent prior to 2006?

A I was, but I was working as a talent.

Q Okay.

A And I just don't recall any particular instance involving anybody.

Q Uh-huh.

A I'm not saying there wasn't. I just don't recall any.

Q Sure.

A I don't know.

Q What about, you know, secondhand talk? I mean, did

talent talk amongst themselves about, you know, whether people thought that one individual was using drugs or not?

Mr. McDevitt. Secondhand talk. What does that mean? What does "secondhand talk" mean? Does she witness secondhand talk?

Mr. Leviss. I defined to you what I meant by firsthand information.

Mr. McDevitt. I'm sorry. I know what firsthand information means. I don't know what secondhand information means. Identify that for me.

Are you asking whether she has heard other wrestlers talking about using steroids?

Mr. Leviss. That is exactly what I just said.

Mr. McDevitt. No, it isn't what you just said. If you know how to phrase a question clearly, I'd ask you do it.

These vague, general questions about what is secondhand information, I don't know what that means. Ask precise questions, please.

Mr. Leviss. I understand. And you can make your statement and you can ask for clarification. But each time you make a clarification, you don't have to then go on to a criticism of how we're doing this. It's going to make it go a lot longer.

I appreciate --

Mr. McDevitt. I have been sitting here quiet all day, allowing you to delve into congressional inquiries and how we write storylines. I haven't said a word. Now I have. Now if you



would clarify your question, we could move expeditiously.

BY MR. LEVISS:

Q I asked you before about what I characterized as firsthand information, and now I'm asking you about when you had a lot of contact with talent -- I guess particularly when you were a talent -- did talent talk about, you know, other wrestlers? Did people ever gossip about, you know, suspicions about whether one wrestler or another was using steroids or using illegal drugs?

Mr. McDevitt. You have about three questions in there. You're still asking her whether people talk about -- you are asking whether she witnessed --

Mr. Leviss. That you witnessed.

Mr. McDevitt. Well, then what's the distinction between firsthand and the secondhand you are drawing in your question?

"Firsthand" means she hears it; what does "secondhand" mean, that somebody else is saying it, and she's what, floating through the room somewhere?

What are you asking her that is different from the first question you asked her? "Firsthand" means you hear it, see it, feel it, touch it, taste it. What does "secondhand" mean?

Mr. Leviss. I'm not interested in what anyone is tasting.

Ms. Levesque, you strike me as an intelligent --

Mr. McDevitt. She is.

Mr. Leviss. I would like to hear from you. I think you probably have an understanding that people can have conversations.

And I'm asking you about conversations that you either took part in or were in the locker room and listened to. That's what I'm asking you about.

Mr. McDevitt. That's firsthand.

Ms. Levesque. I have never witnessed anybody talking about steroids or illegal drugs. Whether it was a conversation happening in the room with me or if someone were speaking to me directly, I personally have not witnessed that.

You know, you have to remember, too, I am the boss's daughter in real life. So I think people are a little careful how they might speak around me as well.

Mr. Leviss. Fair enough.

Did you have any opinion at that time, you know, when you were talent, when you had contact, ongoing contact with talent, did you have any opinion about whether there was any widespread use of steroids among talent?

Mr. McDevitt. At what time are you asking?

Mr. Leviss. I'm still asking about the same time frame we're talking about, when you were talent when you had ongoing contact with talent.

Ms. Levesque. When I was a talent, was I -- would you mind repeating it?

BY MR. LEVISS:

Q The period of time when you had significant contact with ongoing talent, before you were in your present position.

A Okay. So when I was a talent, okay, did I --

Q Did you have any opinion about whether there was any widespread use of steroids among WWE talent?

A No, I had no opinion on the subject.

Q You had no opinion, meaning you didn't think there was widespread use?

Mr. McDevitt. She just said she had no opinion on the subject, Counsel. Did you hear her answer?

BY MR. LEVISS:

Q Did you ever consider whether there was steroid use among WWE talent in that time frame?

A No.

Q It's not something that occurred to you?

A No.

Q Is it something that you discussed with people?

A No.

Mr. Leviss. Okay.

Mr. Cohen. Why don't I start with the next set of questions? We're going to walk through a set of questions now.

Actually, before, do you have any thoughts?

Ms. Safavian. I'm a little lost as to where we are on the topics.

No, we're fine. Thank you.

BY MR. COHEN:

Q Let's sift through a set of topics about the current

Wellness Policy that's in effect.

Were you involved -- did you play any role in the development of the current WWE Wellness Policy?

A No, I did not.

Q You did not. Okay.

Were you aware that -- when the policy was being developed?

A Yes.

Q But you were not involved in any of the discussions?

A No. At that time my sole responsibility was --

Mr. Leviss. We've been joined by Susanne Sachsman, who is another counsel with the majority staff.

Ms. Levesque. I'm Steph.

BY MR. COHEN:

Q There have been several amendments to the Wellness Policy. Have you been involved in the discussion or enactment of any of those amendments?

A Yes.

Q Okay. There are two amendments I'd like to discuss. One was -- let me hand these out. We'll call these Exhibits 1 and 2.

[Levesque Exhibit No. 1  
was marked for identification.]

[Levesque Exhibit No. 2  
was marked for identification.]

Mr. Koch. How do you spell the young lady's name who just came in?

Mr. Cohen. S-A-C-H-S-M-A-N.

BY MR. COHEN:

Q These two amendments are amendments to the policy that allow wrestlers who have tested positive to appear on television?

A Uh-huh.

Q The first of these two stipulates that the wrestler will not be paid. The second stipulates that they will be paid a small stipend. Were you involved in the development of these amendments?

A Not of Exhibit 1.

But let me just read Exhibit 2.

Yes, I was involved in Exhibit 2, not in Exhibit 1.

Q Okay. Can you describe your involvement with regard to that exhibit?

A With regard to Exhibit 2?

Q Yes.

A A discussion was held between Vince and John Laurinaitis and myself, which was, you know, why should the company be penalized when an individual has made a mistake, so why shouldn't we have them work live events as well as television and pay-per-view?

Q I see.

A That is the reasoning for the second exhibit.

Mr. Buffone. So your Exhibit 1 is the second amendment?

Ms. Levesque. Second amendment is Exhibit 1.

Third amendment is Exhibit 2.

Mr. McDevitt. Are you on the same?

Mr. Buffone. Yes.

BY MR. COHEN:

Q So you were not involved in the original decision to allow wrestlers who test positive to appear at televised events in pay-per-views?

A I was not a part of this exhibit, no.

Q Okay. Do you know if anyone in Creative was involved?

A No. Vince, who is essentially the head of all Creative, but this was mainly done with Vince and -- Vince.

Q Okay. This was --

A Vince and John Laurinaitis and Legal primarily, because this exhibit predates my involvement with Talent Relations.

Mr. McDevitt. When you say "this," you mean 1?

Ms. Levesque. I'm sorry. Exhibit 1 predates my involvement with Talent Relations. And the Creative Writing Team is not involved in any amendments to any contracts or the Wellness Policy or anything. They really just write the creative.

Mr. Cohen. Okay.

BY MR. COHEN:

Q And now you had described to us the policy change, that these two amendments went into effect allowing wrestlers to appear. There's since been a change to that policy?

A Yes. It has not been in writing, however.

Q Okay. Can you just briefly -- I know you walked us through it. I just want to understand make sure I understand the time frame correctly.

Can you walk us through the changes that have been put in place since this third amendment was passed and when those were put into place?

A The best I can recollect, we had -- let me take it from the top.

When we first implemented the policy, performers were not allowed to appear on television or pay-per-view. We then made the second amendment because creatively it is so difficult, you know, to make these stars and you build these stories and then, oops, they're gone. So we said okay we'll -- let's allow them to work television and pay-per-view.

Then we said well, if we're allowing them to work television and pay-per-view, why should the WWE be penalized for this person's mistake? So we said, we'll allow them to work live events. The \$200 stipend is really just for everyday cost of living; we didn't want to be unreasonable.

So then, we've now -- we do not have it in writing.

Mr. McDevitt. I'm going to -- I'm -- we covered that. I can find out for you whether it's further amendments.

Mr. Cohen. Okay.

Ms. Levesque. So now we have made the decision that once we are going to make the names public, which was as of November 1,

that we are not going to feature these performers on television, pay-per-view or live events.

Again, in a special circumstance, we will, but only within a week's period of time. The next available television program or pay-per-view, we will end the storyline creatively that we need to end, and they will be suspended.

Q And has talent been made aware of that change?

A No.

Well, hang on. Talent has been made aware that their names will be public as of November 1. But if you read these amendments, it's always been the spirit of the amendments that it's at WWE's discretion whether or not we use you for television, live events or pay-per-view. So it is still at our discretion.

The company's made a decision that we're not going to use talent ongoing on TV because we don't feel it makes a lot of sense. If you are making the names public and people are aware that these talent have been suspended, then it didn't make sense to us to have them on television. So that's why we made the last change.

Q Okay.

Now, again, this last change allows that they may appear in one event -- after the suspension is announced, they may appear at one event to clean up a storyline?

A Again, it's not anything that is that cut and dried or that black and white.



But, yes, it would be -- just talking amongst ourselves, it would be that the next available opportunity to end that storyline, which at the most is only a week, because once we find out, we have to do something on that next pay-per-view or that next television, and we have weekly television and pay-per-view events. So it's easy for us to make a change, but we do need to creatively segue somehow because we are an entertainment company, not a sports company.

RPTS JOHNSON

DCMN SECKMAN

[11:24 p.m.]

Q Okay. I want to clarify something. I had asked this before, and I am still a little bit confused. Is there a scenario where a wrestler tests positive, talent tests positive, is formally suspended, but before the announcement is made that that individual is suspended, they make an appearance?

A We have not come across this yet. So we are not sure.

Q Okay.

A Or I am not sure, I should say. I am not sure how we are going to handle it.

Q Okay.

A Since November 1st, we have had two suspensions. Neither one were involved in a major story line. They were immediately suspended, and their names were released.

Q Okay.

A So we do need to make a determination on this point. But as far as I know, we haven't crossed that bridge yet.

Q Okay. So you are still trying to figure out how to apply this policy?

A Yes.

Mr. McDevitt. You mean, the new public disclosure part of it.

Mr. Cohen. Public disclosure and the appearance of

wrestlers --

Ms. McMahon. Once.

BY MR. COHEN:

Q Let me ask the question again.

A Okay.

Q You are still trying to determine how the application of the new public disclosure policy and the decision to limit appearances for wrestlers who test positive will -- you are trying to determine how those policies will be applied? Is it fair to say it is still up in the air?

A Does that make sense to you?

Mr. McDevitt. I know what you are asking. I think she has answered it. There are only two times it has happened, Brian. What happens in the future, it would be speculation at this point, but I think the essence of what you are asking is, yes.

Mr. Cohen. Okay.

Mr. McDevitt. Still trying to figure some of those things out.

BY MR. BUFFONE:

Q Have you discussed the suspension itself being a script segue?

A No. We don't like to make it public in terms of a script. It is not part of a story line. It is what it is. We make it public. But it is not a part of a story line. We don't want to draw attention to that in a story line because that is not

what fans care about. They are involved in the personal relationship that we have built, hopefully, if we have done our jobs, between these two men or women. And we don't want to bring a real life element into it that might not make sense creatively.

Q So when a wrestler is suspended, are they still discussed on the show?

A Not really. There might be a circumstance, again, this has not happened yet, but I could see a circumstance where they were, you know, a DVD was being released that they were a part of. We certainly would still promote that DVD. But the talent is -- once we make the decision that they are not going to be on television, they are not on television.

Q And would you explain away their nonappearance on television as anything other than a suspension?

A We typically don't explain it.

Q Okay.

A We just move on. And I think our fans are smart enough to know, without us -- we just move on and go to a different story line to engage them otherwise.

BY MR. COHEN:

Q Are you familiar with the results of the testing program that has been in place since early 2006?

A I am aware of I would say the majority of the results now.

Q Okay.

A But, you know, since I have been in charge of talent relations, I am aware of the results.

Q Okay. Are you familiar -- information provided to the committee by WWE indicated that on the first round of baseline testing --

A Uh-huh.

Q -- under the plan, 75 wrestlers tested positive for steroids or illegal drugs. When you found out about that, about 40 percent of the talent that was tested, when you found about that, were you surprised?

A I didn't find out about that until just recently. And yes, I was surprised.

#### EXAMINATION

BY MS. SACHSMAN:

Q Why were you surprised?

A Because it seemed like a large number to me of people who were using illegal substances.

BY MR. COHEN:

Q Did you take any additional action or did you recommend any additional action after finding out about those 75 positives?

A I wasn't in a position to take action. I knew the wellness policy was being implemented and that the first round of tests would, you know, have punitive repercussions for those who were continuing to use whatever substance.

Q Okay.

A But again, I wasn't made aware of that information at that time.

Q Okay.

A I learned about it later.

Q When did you learn about it specifically?

A I am not sure, but at some point after the fact.

Q Okay. Can you nail it down a little bit tighter?

A Probably not until, you know, after Benoit passed. So it wouldn't have been my place to say, hey, obviously something needs to be done. But -- it is purely speculative at this point, but I don't think I would have because something was being done. And that first round of tests, you know, there were suspensions for people who clearly did continue to have things in their systems.

Q The application of the current policy now, can you describe to us your relations with Dr. Black? Do you have --

A I have met Dr. Black.

Q Uh-huh.

A He was wearing a Santa Claus tie in June. So he made an impact on me. But that is pretty much it. He came in for one meeting that I was a part of where we were discussing the wellness policy and improvements we could make, et cetera. But I was not -- that is really my only involvement with Dr. Black.

Q Okay. And do you ever -- do you have communications with him regarding the policy on an ongoing basis in your current

position?

A No.

Q Okay. When a wrestler tests positive for a prohibited substance how do you find out about this positive test.

Mr. McDevitt. Can I just ask, when you say, mean tests positive, you mean after he does all his work and declares it to be a positive?

Mr. Cohen. Correct.

BY MR. COHEN:

A Okay. Once -- the WWE is notified through our head counsel, Ed Kaufman. And Ed notifies myself and John Laurinaitis and Vince.

Q Okay. Jerry, you made the distinction there between being informed of a positive test and being informed after -- of Dr. Black's recommendation after he has gone through his process after an initial positive test. He consults with the wrestlers. He then makes a formal determination about whether a suspension is warranted. And our understanding is that -- once he makes that decision, that is passed on to Ed Kaufman, and that is when you find out about it?

A As far as I understand, yes.

Q Okay. In a case where a wrestler has a positive test but is either given a warning or receives a medical use exemption for a particular drug, are you informed of that result?

A I am not informed unless it is a -- unless there are

punitive actions to be taken.

Q Okay.

A If that answers your question.

Q I think that answers my question.

A Okay.

Q Would a warning be considered a punitive action?

A I was not aware we gave warnings. So I have never heard of a warning.

Q Okay. There were -- you are not familiar with any wrestlers who have tested positive through Dr. Black's tests and received warnings from WWE rather than being suspended?

Mr. McDevitt. When you say warnings from WWE, did you mean to say warnings from Dr. Black?

Mr. Cohen. Yes, that is right.

Mr. McDevitt. All right. I mean, that is an important distinction.

Mr. Cohen. It is an important distinction.

Mr. McDevitt. Right.

BY MR. COHEN:

Q Are you familiar at all with cases where wrestlers had received warnings from Dr. Black but have not been suspended or otherwise penalized by WWE?

A I was really not aware that we or that Dr. Black ever issued warnings.

Q Okay.



A I am actually very interested, because I have never heard that before.

Q Okay. I am just going to ask specifically, and I don't mean to badger on this point, there was a specific case that Dr. Black informed us about where he and Vince McMahon had a disagreement about whether a wrestler should be suspended or had been given warnings. Are you aware of any such incidents between Dr. Black and Vince McMahon?

A I am aware they had a conversation, but I was not a witness to that conversation, so I do not know what was discussed.

Q Okay. How did you become aware that they had a conversation?

A Just I was aware from a conversation I had with my dad. I mean, it was a personal conversation. That is why I referred to him as my dad, and he just made some comment about speaking to Dr. Black today.

Q Okay. And he --

A To the best of my recollection. I mean, I believe this was a while ago.

Q He didn't note any disagreement that he may have had with Dr. Black or indicated that the issue was whether a wrestler should or should not be suspended?

A Not that I can recall specifically.

Q Okay.

A What I am aware of is, since I became in my position of

talent relations, that we have a hard and fast policy that if someone tests positive, they are suspended for 30 days at the first offense, 60 days for the second offense, and they are terminated for A third offense.

Q Okay.

A I was never aware of any warnings.

Q We are going to move onto one more topic -- actually, I may have a wrap-up topic after this, but the next topic is going to be on other safety issues. But I just wanted to see if you had any questions.

Ms. Safavian. No, we are good.

Mr. Cohen. One last question on this topic.

BY MR. COHEN:

Q The decision to announce publicly that wrestlers were to be suspended for positive tests, was there any disagreement that you are aware of within the organization about making those suspensions public?

A That I am aware of, no. We discussed it.

Q Uh-huh.

A We questioned the -- how it would affect the performers.

Q Uh-huh.

A And that is why we made the decision to say that they were being suspended in violation of the policy but without saying what they were violating specifically.

Q Okay.

A We were trying to protect the integrity of the performers, but at the same time letting the performers, as well as the rest of the world, know this is for real and it will be made public, in an effort to hopefully further deter use.

Q Okay. And there was no disagreement being created by that decision?

A No.

BY MR. BUFFONE:

Q What about the decision to not have performers appear on shows that went along with that decision?

A What about that decision?

Q Was there any disagreement with that decision to not have performers appear?

A No.

BY MR. COHEN:

Q Other safety issues, ringside safety.

A Uh-huh.

Q We understand that WWE -- in your role as director of talent, are you responsible for WWE referees as well?

A My department is, yes. In my role as the head of talent relations, yes, referees report to us.

Q Okay.

A They actually have -- some of them have a dual reporting structure, because some of them are a part of event operations, they are part of what is called ring crew, and they set up and

tear down the ring. And it is actually paid -- they are paid through two different departments, which is very odd, and it is something I am looking into since I took over, but that is the way it is right now.

Q Okay. We understand that WWE referees, they are not like major league baseball umpires or NFL referees. They are there to be part of the show. They are not impartial judges.

Mr. McDevitt. Might be like NBA referees.

BY MR. COHEN:

Q Nor are they there to assure fairness. But --

A But they are there to give the impression that that is what they are there to do.

Q Indeed, it does seem to us, though, and maybe you can offer some input here, do referees play any role in matches? Do they help wrestlers communicate with each other? Do they communicate with other talent outside the ring? Can you talk with us about the role of the referee?

A The role of the referee, from a fan perspective, is absolutely to maintain the integrity of a match.

Q Uh-huh.

A No closed fist punches, no holds for more than 5 seconds, you know, that kind of thing.

Behind the scenes, the referee is very much involved in communication between talent. If, you know, say I want Jerry to come -- I am on the outside of the ring. I have been thrown

outside the ring. I am pretending that, you know, my back is hurting me, and I want Jerry to come dive on me. I might tell the referee, tell Jerry to come dive on me. You know, and the referee will go in the ring and tell Jerry. And sure enough, Jerry will come dive on me.

Mr. McDevitt. Better explain how that happens.

Ms. McMahon. Okay. The referee has an IFB, which is a hearing device. And the referee is wired to what is called guerilla position. Guerilla position, I know it is difficult, guerilla position is basically the last bastion of communication from when a talent walks through the curtain and goes down the ramp or out the entranceway, whichever we have with that particular set. So we tell people, you know, you have 8 minutes. You are timed, because we are live. We are in a scripted show. You have a certain amount of time. You are 8 minutes. You don't have your pyro; it is your short entrance, go. You know, and they go, and they understand everything I just said. And then the referee, however, does still have communication with the people at that position, at that entry point, that are hidden from the camera. So the referee, for example, if they need to cut the match short, we can tell the referee, Cut the match short. If it looks as though someone is hurt, we ask, Is so and so okay? The referee goes over -- and this is, you know, very inside -- but the referee goes over and either asks the performer verbally, are you okay, and he will either get a response; or if someone's

unconscious, you know, clearly he will end the match. If a person is okay, he gives a signal. And if a person is not okay, he gives a signal. And he doesn't have to be asked, is someone okay? Just I am using that as an example. The referee on his own if something happens will go and check a performer. Because we know in our business what is meant to happen and what isn't meant to happen. So, you know, we know when something doesn't look right, to check on them.

Q Do your wrestlers, do they receive any training -- I am sorry, do your referees receive any training?

A Yes.

Q Do they receive any medical training?

A The referees do not receive medical training, no.

Q Okay.

A We have EMTs, as well as local doctors all on-site.

Q Okay. And you indicated that your referees do have authority to end the match?

A Yes.

Q Due to injury, they can call the match?

A Absolutely.

Q Has this happened, to your knowledge? Have referees ended matches early because of injury?

A I can't think of an instance off the top of my head, but I am sure that there are.

Q Okay. What about ringside doctors? Can you discuss

your ringside doctors and the role -- how you choose them and what role they play?

A Currently, we have local doctors. And they are with the EMTs watching the show.

Q Okay.

A They also have a walkie-talkie for communication. And I am not sure, I don't believe they have an IFB. But they do have the walkie-talkie.

Q And those are local doctors?

A Local doctors at the buildings currently.

Q Uh-huh.

A We are actually in the process of looking for a more comprehensive, sports-type doctor.

Q Okay.

A But so these local doctors are at the triage, which is right outside the guerilla position. Should, God forbid, something happen, we want to make sure we have a station right there, so they don't have to be walked to a back stage area, which did happen in the past before we instituted this triage. So you know, we learned as we go. So the doctors are at this triage. And should something happen, the doctor and the EMTs run out.

Q Okay.

A Should the doctor for some reason miss it, we are calling for the doctor at the same time, and the doctor has the ability to call the match as well.

Q They do. Okay.

BY MR. BUFFONE:

Q How do they communicate with guerilla position?

A They have walkie-talkies. That is how they communicate with guerilla. And should they not work, they are right next to guerilla, so they just run out.

BY MR. COHEN:

Q Okay. Is there a way for these ringside doctors to communicate with WWE management regarding injuries?

A Absolutely.

Q How does that process occur?

A Well, can you be more specific with your question? Because there are a number of different scenarios.

Q Yeah. Let us say, the scenario -- I mean, obviously, if a wrestler has a broken leg, that is going to be a very obvious injury. A scenario where a referee has a concern about -- I am sorry, a doctor has a concern about a more chronic injury.

A During the day?

Q During the day prior to the match.

A Prior to the show?

Q Or after a show. For example, if a wrestler receives a concussion and is walking around on their feet, but the doctor has reason to believe that there may be some longer-term effect. Do they have the ability to communicate with WWE management?

A Absolutely, they are required to communicate any such



injury or concern. They are required. They are mandated to let John Laurinaitis know, and in John's absence, me, and in my absence, Vince.

Q They are mandated by their contractual agreement with WWE?

A Absolutely. And you know, I am not sure exactly the language, but that is definitely verbally reinforced. And I am pretty positive it is in the writing. I just don't have the document in front of me.

Q Okay. And do they ever provide recommendations? Do they say listen, this individual has -- this particular injury, he ought not to wrestle for a week or 2 weeks; he needs to be off his feet? Do they provide those kind of recommendations?

A They are not treating physicians. So they might say -- and I can think of an example recently where somebody didn't seem to be feeling right, and they were very concerned and brought it up to management and said we would like to send him to the hospital. Management said fine. So this person went to the hospital, wound up he had appendicitis and had to have his appendix removed. So, clearly, that was a case where a doctor was concerned and took action with management. I say not a treating physician because the local doctor might say, you know, this person is complaining about a knee injury; I think they should follow up with their treating physician, maybe have an MRI to make sure there is nothing going on. Because they are not their

full-time regular doctor. So they don't have a great knowledge of the talent's medical history as it were. But they certainly make references to their treating physicians. And then it is up to management to follow up and make sure that that is happening.

Q Okay. Have ringside doctors or treating physicians ever diagnosed a wrestler with a concussion and reported this to WWE?

A That I am aware of, no. There was a doctor who issued a warning to us, you know, that this person could develop a concussion but currently didn't have signs of it, and that person never wound up developing one.

Q Okay. Are you aware of any times where wrestlers have I guess self-reported -- where wrestlers have self-reported to you that they received concussions and this information came from the wrestler rather than a treating doctor?

A Not that I am aware of, but I am not saying that that never happened.

Q Right.

A Just not involved me.

Q Okay. All right. Are you aware of any incident where a wrestler in a match received a concussion?

A No.

Q Does WWE have a policy for time off if talent suffers a concussion?

A Yes. We go with the recommendation of the treating physician.

Q Okay. How about in cases where talent has suffered multiple concussions?

A Well, in the case -- the only case I can think of, this person was -- actually, I think he is still under contract to us. And he suffered a number of concussions and has wound up, I think, forming a foundation to look into concussions. But clearly he no longer performed for us. We are not going to put anybody in danger.

Q Okay. You have indicated that you are not aware of a case where a wrestler has received a concussion. Do you believe that WWE wrestlers are at risk for concussions because of the nature of their work?

A I think, under certain circumstances, yes.

Q Can you describe those circumstances?

A Well, inherently any move can be done incorrectly. You really are giving your life to the person that you are in the ring with. It is much more than guys just punching each other. Every move, even a simple body slam could go wrong, and you could land on your head. That, in and of itself, is very, you know, it is a very skilled move to do. You wouldn't think it just watching it, but it is. So, I mean, I would think if anything went wrong, certainly you would be at risk for concussion.

Q Would a chair shot to the head or a pile driver on an unpadded surface, would those present concussion risks?

A Not -- I mean, a pile driver, no, because your head

never actually hits. And a chair shot, there is a particular way to hit someone with a chair. And again, if you screwed up and hit someone wrong, then sure. Or if you slipped on a pile driver and let somebody go, absolutely.

Q Okay.

A But the moves as they are supposed to be performed, I would say, no.

Q Okay.

A And mistakes do happen, certainly, as in life.

Q So if you had an unskilled wrestler and there was some concern that -- you have described, I think, Hulk Hogan as not a very good wrestler.

A Right. Which I didn't really realize I was on the record and wasn't thinking about that. But yes, he --

Q I want the record to reflect that was your description.

A Correct.

Mr. McDevitt. Technical performer.

Ms. McMahon. Terrific performer, charisma oozing out of everywhere, just not a great technical wrestler.

BY MR. COHEN:

Q A scenario where you had a wrestler who was not a great technical wrestler, and you are concerned about perhaps the protection of the other wrestler in the ring with that individual, are you in a position to script the moves of that match to protect a wrestler?

A We would never put anybody in a ring that didn't know what they were doing fundamentally. When I said Hulk Hogan wasn't a great wrestler, I didn't mean he didn't know how to do the moves, the move technically. He just had three moves. And that is all he did. That is what I meant. It wasn't an exciting, technical display of reversing holds and, you know, multiple different maneuvers. It was a very basic match. Psychologically, it worked every time. The crowd got behind Hulk. But he was skilled in how to perform those moves. We would never put anybody in the ring who was an unskilled wrestler to the point where we were concerned about the safety of those in the ring. We wouldn't put anybody in jeopardy that way.

Mr. Cohen. Okay.

BY MR. BUFFONE:

Q Do you track concussions?

A We have medical notes that are provided to Dr. Ray, who is third-party. And all the medical notes come from the doctors that we work with. And so certainly there is a listing of everything. And I am not sure to the point where we have -- we have asked, have there been concussions documented? And we were told no. To my recollection, I was told no, because I asked specifically the question. And I know that going forward -- so there was no documentation of concussions, at least at the point of which I asked.

Q When was this that you asked?

A This was recently, since Benoit and since Michael Benoit came out on whatever show it was; I mean, about concussions, I asked. And but so there is no documentation as far as I am aware of. However, we are looking into certain tests that can be done to look at concussions or pre-concussion syndrome, et cetera. I think it is called impact testing. So it is something going forward that we are certainly looking at to make sure we can ascertain whether or not someone is prone to concussions or -- I think you get a baseline level of someone, and then if they do have a concussion, you can tell -- I am not sure exactly the specifics of it, but it is something we are looking into doing as a proactive implementation.

Q So, if I understand you correctly, since the enactment of the wellness policy, WWE has documented no concussions?

A As far as I know, as far as I was told --

Q Yes.

A -- no.

BY MS. SACHSMAN:

Q And who told you that?

A I was told that by Ed Kaufman, who is our head counsel.

Mr. McDevitt. You should not be disclosing any privileged communications. I didn't realize that is where that came from. And I would instruct you not to answer any further questions about that.

Mr. Buffone. Do you script --

Mr. McDevitt. Not in any case -- in any questions you give, you never disclose communications with counsel, period.

Ms. McMahon. Okay.

Mr. McDevitt. If the question calls for it, ask me, and before you give an answer. You should never disclose communications with counsel.

Mr. Buffone. Do you script --

Ms. Sachsman. Of course, just for the record, the committee does not recognize attorney-client privilege. So certainly, you know, you should discuss that with your attorney, and we will discuss at that point whether we need you to disclose that information.

BY MR. BUFFONE:

Q Do you script chair shots to the head?

A No. At times, we discuss -- I should say, to be clear, the writing team does not script chair shots to the head. We might script what is called heat, which is when you are getting extra physicality than just winning a match. It is when you are really beating someone down in order to elicit a reaction from the crowd of, "Oh, my God, please get up, get up, get up," and the guy can't. It is a way of continuing a story line to where you really want to see that bad guy who got the heat on the baby face, you want to see him get beat. So, in essence, if we wrote in heat, we might -- the agents, the producers might then subscribe to a chair shot or, you know, if there is a particular -- there are all

different props.

Q So the agents may instruct chair shots?

A They might suggest it with the talent. It is really up to the talent to determine how they want to get the heat, how they want to convey the message. For example, if there are a number of guys in the ring, like say there is five guys attacking one guy, and I am a good guy going to come out, if I come out by myself, I am going to get beat down just as bad as the other guy. But if I come out with a chair, I might have a better chance. Logically, so that is how the chairs are used. You might have seen -- or I don't know if you have seen any of our scripts -- but there might be chair shots written in at some point. But they are suggestions. They are guidelines. It is the producers and the talent who determine what exactly is used and how.

Q What about pile drivers to unpadded surfaces?

A Those are talent calls only.

Q Okay.

A And talent -- there is only, as of right now, we only allow two people to do pile drivers. And they are two of the stronger guys, superstars who have done these maneuvers for a long time, really know how to do them safely. They are very rare. They have to be approved. Pile drivers, chair shots, everything has to be approved, and it is all approved by Vince.

Q So chair shots do need to be approved by --

A Absolutely.



Q -- Vince McMahon before they occur?

A Yes.

Q And what happens if they are not approved?

A Then they work around it, and they don't use chairs.

Q I mean, are you aware of incidents where chair shots to the head have occurred that were not preapproved by Vince McMahon?

A Yes, and Vince was very upset about it.

Q And what was the --

A And it was very rare. But it was someone, you know, taking the script, if you will, into their own hands and using a chair. It is very rare that it has happened. But I can think of one time where Vince was so upset, because we want to use chair shots judiciously as well. You know, if our show just becomes a bunch of chairs, then you lose the art of wrestling. And that is not what we want to do.

Q And do you give wrestlers guidelines for -- I guess you said that for chair shots to the head, that they must be preapproved by Vince McMahon?

A Any props have to be preapproved.

Q And is that a safety concern or a not wanting to use excessive amount of props concern?

A It is more about excessive props. If there is a particularly dangerous maneuver where you want to do something through the announce table, that is a safety concern. But either way, they have to be approved.

Q And so what ways does WWE try to limit potentially hazardous moves that may cause concussions or other injuries?

A Can you ask that again?

Q Does WWE have regulations or guidelines or standard operating protocol that limits the use of potentially hazardous moves that may cause serious damage, such as a concussion? What kind of protocols does WWE have in place that it gives its wrestlers?

A Well, again, in terms of concussions specifically, we don't believe that there is any particular move, unless it is an accident, that will cause a concussion. So an accident we can't foresee. But certainly a more dangerous maneuver, like one I was describing through the announce table, or you know, we have had someone fall off the Hell in the Cell, which is a giant 30-foot cage. And it is all, you know, done with a stunt man. WWE has a stunt man under contract. And everything is done as safely as we possibly can, but there is still risk assumed. These guys are essentially highly skilled stunt men in some of the stunts that they do. So any time there is a high-risk maneuver, it absolutely has a protocol that it has to be, first of all, approved by Vince. Vince himself has performed more of the stunts, because he believes that anything he asks people to do, that he should do. So Vince typically does the test run. And then there is always a test run before the performer is asked to do it. And in the case of a highly specialized stunt like that, which would be more of

the dangerous stunts that you are talking about, and then the talent themselves perform the stunt to make sure they are comfortable with it before we do it live on the show.

BY MS. SACHSMAN:

Q What is the process for getting approval, the preapproval by Vince?

A The producer or the talent go to Vince and ask him. In the case of a big planned stunt?

Q Uh-huh.

A The same process happens, just earlier.

Q At what point does that happen in a not sort of large, preplanned stunt? So a chair shot or --

A It is the same. The agent or the producer -- the agent and producer is the same. That was something I covered before. I use them synonymously. But they speak with Vince the same way.

Q And I guess what timing is that? And I am just not particularly familiar with the --

A It depends. If it is a big planned stunt, typically we have a week to 2 weeks, maybe even longer, sometimes to really plan it. And those bigger stunts are worked on at pay-per-views, which are our bigger events. If there is a chair shot to the head, typically that is -- or to the back or to the leg, typically that is determined day of, and we discuss it with talent, and the talent get involved in how they want to get the heat or how they want to do whatever they want do. And then it is discussed with

Vince that day.

Q Does talent ever make -- you had referred to certain decisions, like how they were going to do the heat, as decisions that the talent ultimately gets to make. Does talent make decisions like that ever during the show or just immediately before the show?

A On their own?

Q Yes.

A Is that what you are asking?

Q Yes.

A On their own without approval?

Q Yes.

A They are not supposed to, and no. But there has been the rare occasion that they have. And that is what I was referring to before when Vince was so upset. I mean, I can think of maybe one instance, and not even specifically. So it is very rare that that happens. Talent is very well aware that they either have approval to do something or they don't.

Q What if you are changing up the script in the middle of a show? I am not sure, do you ever change up the script in the middle of a show?

Mr. McDevitt. The script or the script for the ongoing match?

Ms. Sachsman. I guess I should be more specific.

BY MS. SACHSMAN:

Q Do you ever change up what is going on in that match during a show?

A Not from a writing perspective. From a perspective of the two talent who are in the ring, they are trying to tell a story. And the fans aren't reacting, so they need to do something different; yes, it might change. But that does not necessitate a chair shot, that kind of change. That involves changing the structure of your match. Okay, you know what, this isn't working. I am the baby face. I am going to shine on you for a little bit. Let us see if we can get the people behind us.

Q And is that a decision at that point that is done by talent? Does talent ever get to make decisions on what they are doing like that during --

A The skilled ones --

Q -- the process?

A -- yes. In terms of, you know, it is not working, they do what we call an audible, and they do it on the fly. But a chair shot would never be a part of that.

Q Okay. So if at some point then somebody said, oh, a chair shot would be really great right here in this scenario that we are having, what would be the process then?

A That has to be predetermined.

Q Okay.

A Any stunt or any prop use has to be predetermined. You can't on the fly use a prop.

Q So before the television show?

A It can also get you disqualified. Because it changes the finish of the match. It is a little complicated in terms of the creative -- the referee is there to give the illusion that he is a referee. And should someone bring in a prop in a match that is a -- not a no disqualification match -- we do have a match that is a no disqualification match where everything is legal. And in either case, chair shots would have to be preapproved.

BY MS. DESPRES:

Q Is there ever an instance where talent says -- where a specific move is suggested to a wrestler and the wrestler says they aren't -- don't want to do it because it is too dangerous, for example, where they refuse to do a move -- not refuse, where they do not take the suggestion about doing a move?

A Yes. That has happened. If a talent is not comfortable doing something, we are not going to put them in danger.

BY MR. BUFFONE:

Q Contractually, could you? Not put them in danger, but could you -- not saying that you could contractually put them in danger, could you contractually force a talent to do a move?

A No.

BY MR. COHEN:

Q I want to ask about an incident that happened on October 22nd, 2007. This was a match involving wrestler Candice Michelle.

A Michelle.

Q Michelle?

A Yeah.

Mr. McDevitt. What was the date? October --

Mr. Cohen. October 22nd, 2007.

BY MR. COHEN:

Q In performing a stunt, she fell from the top rope and was knocked unconscious. Are you familiar with this incident?

A Yes.

Q The referee in that match appeared to have directed the other wrestler, as she was laying unconscious, appeared to have directed the other wrestler to pull her by her neck and her underarm to the middle of the match -- to the middle of the ring for a pin to end the match. Do you remember this incident?

A Yes, and that referee made what could have been a huge mistake. And the referee was severely reprimanded after. And it was reinforced again with the referee there, and then with all the referees the following day, that you have the ability to end the match. It is constantly reinforced. And should something like that ever happen, it is your responsibility and duty to end the match.

Q Okay. So you provided additional guidance. Did you provide any additional written guidance to your referees?

A It is all already in writing. And it was then verbally reinforced, yes.

Q So this was a decision made by the referee on his own to

have her pulled to the middle of the ring?

A Yes, and he screwed up royally.

Q Okay. Do referees receive any specific training in how to deal with traumatic neck or head injuries?

A The training that they are given is to stop the match and call the EMTs to the ring. They are not qualified. They are not doctors. They need to call the doctors, the specialized people into the ring.

BY MR. BUFFONE:

Q Were the other people who came out to the ring after the match was ended, were those the EMTs?

A The EMTs and the doctor.

Q And they proceeded to sit her up?

A I know.

Q And try and give her water?

A And I can't speak to why they did that. It alarmed me. But I am not a doctor. So, clearly, they made that decision for whatever medical reasons they did. She responded or --

Q Those were local doctors?

A No, at that time, that was our physician that we had traveling with us on the road. And we have since terminated him in order to get somebody who has more sports medicine experience, to get somebody better.

Q So what has been WWE's reaction to this incident?

A A number of policies were actually implemented because



of this. It was reinforced then with the doctor and with the referees that absolutely you have to end the match should anything like this happen ever. In addition, the EMTs always had a dry run of how they would come to the ring and exit the ring should there be, you know, any type of accident. Only, in the past, they didn't do it with a stretcher. Well, now we mandate that they have to do the full rehearsal as if it is a dress rehearsal with the stretcher. In addition to that, they have to have a predetermined area where they are going to hold the patient, the talent before the ambulance gets there.

So, you know, in the case of Candice, we were just running back stage, and eventually they found a little nook where they put her. I mean, and it was ridiculous. And we were infuriated by it. And luckily, it just turned out to be a separated shoulder, but it could have been so much worse. And, you know, unfortunately, sometimes it takes incidents like this for us to improve our policies. And that is what happened in this case.

Q And wasn't she diagnosed with a concussion?

A I don't recall. I don't believe so, but she might have been. But I don't believe so. She was unconscious. So if that warrants a concussion, then -- but I don't recall.

Q And was that -- did you ask about information about a concussion before or after that incident?

A It was before, my question about concussions.

Q This incident was before your question about

concussions?

A No, this incident was after.

Mr. Buffone. After. Okay.

BY MR. COHEN:

Q Do you provide health insurance to your wrestlers, your talent?

A No, we do not.

Q Can I ask why not?

A Yes, because we have actually looked into it, and because the wrestlers live all over the United States, it is very difficult to find any group that would actually support this, you know, people who live all over the place. There are no discounted rates. There are no benefits to doing it. Also, more than 60 percent of our talent already have health insurance. So it would be difficult to say, Well, you have to be a part of WWE's insurance because, you know, we are mandating it as such when you might have better insurance with your family.

Q So you believe it would be a hardship for your wrestlers?

A We believe it would be more difficult for them, yes. But what we are doing now, as a part of what I discussed before, is we are going to be educating the talent more in terms of, you know, you should be thinking about health insurance. You should be thinking about financial planning, et cetera. But it is very difficult for us as a company to -- because these guys live all

over the place -- to have one group.

Q To clarify, you have been unable to find a provider that would provide health insurance for your talent because they are so widespread, or you just haven't been able to find one you believe is cost-effective?

A No, we decided that it wasn't the best policy for our talent because, A, because over 60 percent have health insurance; and B, it did not seem like a logical course of action. We did have discussions with several different healthcare providers. And once they laid out all of their concerns, you know, we brought it back and discussed it as a group and said, Well, it doesn't seem to make sense. However, we should make sure that we educate talent and make sure that they are aware that healthcare is necessary, and possibly make a few suggestions and, you know, but without having one uniform provider.

Mr. McDevitt. You also haven't asked the question about contractual relationships with talent. Contractually, it is their responsibility to have their own insurance.

BY MR. COHEN:

Q To the extent that there is an injury that -- an acute injury in the ring, wrestler breaks his leg in the ring, to what extent does WWE provide coverage for treatment of that injury?

A We pay for it in total.

Q And to the extent that this is a chronic injury that has occurred, a wrestler develops arthritis, or because of repeated

contact or that kind of an injury, does WWE cover the cost of any treatment for those kinds of chronic injuries that have occurred in the ring?

A There hasn't been any chronic treatment like that. But unless you say like -- actually, yes. So if someone has a bad knee, for example, and they get ice before and after their match and stim and ultrasound, in that regard, yes.

Q Okay.

A But I can't think of any major injury that someone has had that was chronic and required outside rehabilitation that we were unable to provide.

BY MS. DESPRES:

Q Is it part of the contractual relationship that WWE would pay for the care that the talent needed as a part of their -- because of something that happened on the job?

A Because of something that happened on the job, yes.

Q So that is part of the contract?

A To my best recollection, yes.

Ms. Despres. Okay. Thanks.

BY MR. COHEN:

Q In cases where wrestlers ask for time off due to an injury, how are you and how is the creative team informed of that request?

A We are informed that they need -- you know, they have been diagnosed with a torn ACL, and they are going to have

surgery, and they require 4 to 6 weeks off.

Q Okay. Have you ever -- have you or to your knowledge has anyone at WWE ever suggested to a wrestler that they should not take time off?

A Can you be more specific?

Q Are you aware of any cases where a wrestler has asked for time off and has --

A As it relates to an injury?

Q As it relates to an injury -- or an injury, an illness, exhaustion?

Mr. Buffone. Medical concern.

BY MR. COHEN:

Q That is a good way to put it.

A So time off for any reason?

Q Time off for a medical concern, and that wrestler has been encouraged or it has been suggested to the wrestler that they should not take this time off?

A No.

Q And in the opposite case, are you familiar with any cases where WWE officials, you or other WWE officials, have told the wrestler and suggested that a wrestler might need medical time off for a medical --

A Not for medical but for personal, yes.

Q Okay.

A In the case of one of our performers who was just

working so much and requested to work that much, we said, you know what, Mr. X, you need to take some time off. We are going to unbook you from these live events. But it was not due to a medical reason.

Q Okay. One more piece on this one, and then I will ask if you have any. One of the suggestions Dr. Black, in our interview with Dr. Black, he told the committee that one of the suggestions he has made to WWE is that a medical trailer travel with WWE so there is always appropriate medical equipment and a WWE affiliated doctor at events. Are you aware of this recommendation?

A No.

Q Can you tell us if you are aware of any activity to purchase or equip a medical trailer at WWE events?

A No. I know that we have a great deal of medical equipment there. Like I said before, ultrasound, stim, et cetera. But in terms of a truck, no.

Mr. Cohen. Okay. You have anything else?

Ms. Safavian. We do not. Thank you very much.

Ms. Despres. I -- actually, just one last.

BY MS. DESPRES:

Q On that October 22nd, 2007, incident, was that broadcast live on TV?

A Yes, that was a live show. She landed wrong and was knocked unconscious -- and the referee made a terrible decision --

and was pulled into the ring, and she was pinned.

Ms. Despres. Right. Okay. Thanks.

Mr. Cohen. I am sorry, a couple more.

BY MR. COHEN:

Q This is the issue of fan mail. I just have three very quick questions here. Does creative or talent relations have any role in processing fan mail?

A No, we have a Fan Services Department. Some mail might be sent to talent relations which is then forwarded to fan services.

Q Okay. Are you aware, ever aware of any of the content of fan mail?

A No, only the letters that I have received that I signed autographs for or what have you.

Q And in any of the letters that you have received or seen, have you had any cases where fans have asked about or asked about advice for using steroids or --

A No.

Q -- illegal drugs?

A Not at all.

Mr. McDevitt. Fan mail asking who for advice on steroids?

Mr. Cohen. Asking WWE talent for advice or information.

Ms. McMahon. I have personally never heard anything like that ever. I have received a death threat once, but that was it. That was really mean. They didn't like me.

Mr. McDevitt. Brian, I am interested in that last part. Are you saying there is some fan mail that has been published by WWE --

Mr. Cohen. No, no, no, I am just asking about --

Mr. McDevitt. We don't control what people send to us.

Mr. Cohen. I am aware of that, Jerry. I am aware of that.

Mr. McDevitt. All right.

Mr. Cohen. All right. We are done.

[Whereupon, at 12:15 p.m., the interview was concluded.]



## Certificate of Deponent/Interviewee

I have read the foregoing \_\_\_\_ pages, which contain the correct transcript of the answers made by me to the questions therein recorded.

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Witness Name

