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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON (PORTLAND)

WILLIAM ALBERT HAYNES III, individually  
and on behalf of all other similarly situated,

Plaintiffs,

v.

WORLD WRESTLING ENTERTAINMENT,  
INC.,

Defendant.

Case No. 3:14-cv-01689-ST

**DECLARATION OF B. JOHN CASEY  
IN SUPPORT OF DEFENDANT'S  
RESPONSE TO PLAINTIFF'S  
OBJECTIONS TO OPINION AND  
ORDER GRANTING MOTION TO  
TRANSFER VENUE**

I, B. John Casey, declare:

1. I am over the age of 18. I make this Declaration based on my personal knowledge, and it is true to the best of my knowledge, information and belief. I am prepared to testify to the matters discussed herein.

2. I am an attorney with K&L Gates LLP, and I represent defendant World Wrestling Entertainment, Inc. (“WWE”) in this action.

3. Attached hereto as Exhibit A is a true and correct copy of Judge Birotte Jr.’s July 10, 2015, Order Granting WWE’s Motion to Transfer Venue in *McCullough v. World Wrestling Entertainment, Inc.*, No. 2:15-cv-02662-AB-JEM (C.D. Cal.).

4. Attached hereto as Exhibit B is a true and correct copy of the Complaint filed on June 26, 2015, in *James v. World Wrestling Entertainment, Inc.*, No. 3:15-cv-02146-L (N.D. Tex.).

5. Attached hereto as Exhibit C is a true and correct copy of email correspondence on July 13 and 14, 2015, between Jerry McDevitt and Chris Gilreath.

6. Attached hereto as Exhibit D is a true and correct copy of a transcript of an interview with Konstantine Kyros during a March 27, 2015, “Radio Takedown” Podcast. The entire podcast is available for listening at:  
<http://www.blogtalkradio.com/radiotakedown/2015/03/27/drt--ep36--attorney-konstantine-kyros-educates-you-his-filing-on-wwe-lawsuits> (last accessed: July 22, 2015).

7. Attached hereto as Exhibit E is a true and correct copy of excerpts from a June 8, 2015, hearing transcript in *Singleton v. World Wrestling Entertainment, Inc.*, No. 3:15-cv-00425-VLB (D. Conn.).

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

DATED this 23rd day of July, 2015.

By: /s/ B. John Casey  
B. John Casey, OSB #120025

**CERTIFICATE OF SERVICE**

I hereby certify that on this 23rd day of July, 2015, I served a copy of the foregoing DECLARATION OF B. JOHN CASEY IN SUPPORT OF DEFENDANT'S RESPONSE TO PLAINTIFF'S OBJECTIONS TO OPINION AND ORDER GRANTING MOTION TO TRANSFER VENUE on the following parties via the Court's CM/ECF System:

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DATED this 23rd day of July, 2015.

*s/B. John Casey*  
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B. John Casey