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MICHAEL K. JEANES, CLERK
C. HOWE
DEPUTY CLERK

BERNSTEIN CHERNEY, L.L.P.

777 Third Avenue

New York, NY 10017

Telephone: (212) 381-9684

Facsimile: (646) 304-9535

E-mail: hbernstein@bernsteincherney.com

Hartley Bernstein (1050178 NY) (Pro Hac Vice AZ)

MUELLER LAW GROUP, P.A.

2141 East Camelback Road, Suite 100

Phoenix, Arizona 85016

Telephone: (602) 222-9800

Facsimile: (888) 411-1236

E-mail: mschaefer@muellerlawgroup.com

George E. Mueller (015209)

Attorneys for Plaintiffs

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA**

ANDREW GREEN and
STACI GREEN, Husband and Wife,

Plaintiffs,

v.

PAUL D. WIGHT, JR., a/k/a BIG
SHOW®, an individual, WORLD
WRESTLING ENTERTAINMENT,
INC., a foreign corporation doing
business in Arizona, DOES 1-30, XYZ
CORPORATIONS 1-30, and BLACK
AND WHITE PARTNERSHIPS 1-30,

Defendants.

CASE NO. CV2013-003255

COMPLAINT
(Tort Non-Motor Vehicle)

Plaintiffs Andrew Green and Staci Green, by and through counsel, as and for their
Complaint against Defendants named herein, allege as follows:

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2 INTRODUCTION
3 (The Parties)

4 1. Plaintiffs Andrew Green and Staci Green are, and were at all times material
5 hereto, residents of Weatogue, Connecticut.

6 2. Upon information and belief, Defendant Paul D. Wight, Jr. a/k/a Big
7 Show® (hereinafter referred to as "Big Show") is, and was at all times material hereto, a
8 resident of Miami, Florida.

9 3. Big Show is, and was at all times material hereto, a professional wrestler
10 and wrestling entertainer.

11 4. Upon information and belief, Defendant World Wrestling Entertainment,
12 Inc. (hereinafter referred to as "WWE") is, and was at all times material hereto, a
13 Delaware corporation doing business in the City of Phoenix, Maricopa County, Arizona.

14 5. Upon information and belief, WWE is an entertainment and media
15 company, whose products and services include live and pay-per-view wrestling events at
16 various venues around North America and internationally.

17 6. Plaintiff Andrew Green (hereinafter referred to as "Green") was at all times
18 material hereto employed by WWE as a road producer for digital production. His job was
19 to conduct interviews with WWE wrestlers after wrestling matches/exhibitions. In the
20 course of conducting interviews with wrestlers, Green asked questions of the wrestlers.

21 7. Big Show was at all times material hereto an employee and/or agent of
22 WWE for the purpose of appearing at and participating in live event and pay-per-view
23 wrestling matches and exhibitions.
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2 8. Big Show was at all times material hereto acting within the course and
3 scope of his employment and/or agency with WWE, or under the direction and control of
4 WWE under such circumstances as to justify imputing responsibility to WWE for the
5 negligent, reckless, and/or intentional acts complained of herein.

6 9. WWE is legally responsible, by respondeat superior or otherwise, for the
7 acts and omissions of its employees and/or agents, including Big Show, as set forth
8 herein.

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10 10. Upon information and belief, Defendants John and Jane Does, XYZ
11 Corporations, and Black and White Partnerships (hereafter "fictitious defendants") may
12 be in some way responsible for the acts complained of herein. Plaintiffs do not presently
13 know their true identities. Plaintiffs will seek leave of this Court to amend this Complaint
14 to state the true names, capacities and relationships when it becomes known.

15 11. Upon belief, all fictitious defendants were at all times material hereto
16 organized and existing under the laws of Arizona and doing business in the State of
17 Arizona and/or were foreign corporations, businesses, etc., qualified to do business
18 within the State of Arizona, and actually doing business therein.

19 (Jurisdiction)

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21 12. The Superior Court in and for the County of Maricopa has jurisdiction over
22 the subject matter of this action, and has personal jurisdiction over all parties listed
23 above. The amount in controversy exceeds the minimum jurisdictional limits of the
24 Court.

(Venue)

13. Venue is proper in Maricopa County because the acts and omissions that give rise to Plaintiffs' cause of action occurred in Maricopa County, Arizona.

(General Allegations)

14. Big Show's employment by WWE required him to act in a violent, erratic, and threatening manner both inside and outside of the wrestling ring relative to his appearances and participation in wrestling matches and exhibitions.

15. WWE encouraged its wrestlers, including Big Show, to act in a violent and threatening manner both inside and outside of the wrestling ring relative to their appearances and participation in wrestling matches and exhibitions.

16. WWE encouraged its wrestlers, including Big Show, to engage in violent and erratic behavior as part of their participation in staged wrestling events as a means of entertainment.

17. WWE encouraged its wrestlers, including Big Show, to become emotional during videotaped interviews after wrestling matches and exhibitions.

18. WWE routinely publicized the violent and erratic behavior of its wrestlers, including Big Show, both on the WWE website and elsewhere for the commercial benefit of WWE and profit for WWE.

19. WWE knew or should have known of Big Show's propensity to engage in violence and violent confrontations outside of the wrestling arena.

20. Upon information and belief, prior to the events alleged in this Complaint, WWE had suspended or terminated Big Show's employment because of his behavior,

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2 including his engagement in violent and/or unlawful and/or improper activities outside of
3 the wrestling venue.

4 21. Upon information and belief, WWE had fined Big Show, or withheld
5 compensation from Big Show, because of his behavior, including his engagement in
6 violent and/or unlawful and/or improper activities outside of the wrestling venue.

7 22. WWE knew or should have known that Big Show posed an undue risk of
8 harm to others, including Green.

9 23. WWE knew or should have known that participation in staged wrestling
10 events was likely to cause Big Show to become emotionally unstable and volatile.

11 24. WWE knew or should have known that after his participation in a staged
12 wrestling event, Big Show was likely to be emotionally unstable and volatile.

13 25. Upon information and belief, WWE instructs its wrestlers who are
14 employees or agents of WWE to participate in and cooperate with regard to post
15 match/exhibition videotaped interviews, including those conducted for digital media.

16 26. WWE directed Green to interview wrestlers at the conclusion of their
17 WWE sponsored matches and exhibitions as part of his job responsibilities.

18 27. Green's interviews with WWE's wrestlers were recorded on videotape and
19 regularly used by WWE on its website, on YouTube, and elsewhere for marketing and
20 other purposes.

21 28. Prior to wrestling matches and exhibitions, WWE personnel gather in
22 production meetings where they discuss the planned events, and prepare a schedule that
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2 includes designated interviews with the participating wrestlers by WWE's digital media
3 crew, including Green.

4 29. On or about Sunday, January 27, 2013, WWE staged a pay-per-view
5 "Royal Rumble" event at the U.S. Airways Arena in Phoenix, Arizona (hereinafter
6 referred to as the "Phoenix Rumble").

7 30. On the day of the Phoenix Rumble, employees of WWE participated in a
8 production meeting where they determined that Big Show would be interviewed on
9 videotape for the WWE internet site at the conclusion of his match (hereinafter referred
10 to as the "Phoenix Production Meeting").

11 31. WWE employees present at the Phoenix Production Meeting included
12 WWE's Chairman and Chief Operating Officer, Vince McMahon (hereinafter referred to
13 as "McMahon") and Brian Pellegatto (hereinafter referred to as "Pellegatto"), one of the
14 WWE Road Producers.

15 32. Green did not participate in the Phoenix Production Meeting.

16 33. After the Phoenix Production Meeting concluded, Pellegatto directed Green
17 to approach Big Show for an interview immediately following his Match.

18 34. Green had previously interviewed Big Show after an August, 2012 WWE
19 "Summer Slam" event, at which time Big Show engaged in a pre-planned rant in
20 response to Green's questioning.

21 35. WWE took no action or precautions at the Phoenix Rumble to protect
22 Green or to prevent Big Show from causing harm to Green.
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2 36. WWE wrestling events are staged and the outcome of matches is
3 predetermined by WWE such that the wrestlers know, in advance, who the winner will
4 be.

5 37. The Phoenix Rumble featured, among other things, a wrestling match
6 (hereinafter referred to as the "Match") between Big Show and Alberto Rodriguez a/k/a
7 Alberto Del Rio (hereinafter referred to as "Del Rio"), which Del Rio won.

8 38. About five minutes after the Match concluded, Big Show emerged from a
9 staging area referred to by WWE as "Gorilla."
10

11 39. Green asked Big Show to participate in the videotaped interview as planned
12 at the Phoenix Production Meeting.

13 40. Big Show refused to participate cursing at Green and declaring, with
14 profanities, that he would not do any interview.

15 41. Green advised Big Show that Eric Pankowski, a senior vice-president of
16 WWE, (hereinafter referred to as "Pankowski") wanted Big Show to participate in the
17 interview.

18 42. In response, Big Show stated with the use of profanely indecent language
19 that if Green wanted an interview then he would give him one, and to turn on the camera.

20 43. Big Show went toward Green enraged, shouting obscenities, and waving
21 his fist in Green's face. Big Show then grabbed Green by the collar and throat, striking
22 Green in the face and backing him up against a trunk while declaring "You son of a bitch
23 ... Are you having fun right now ... Don't ever come up to me again ... I don't give a shit
24 who you are" (hereinafter referred to as the "Attack").

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2 44. The Attack was captured on videotape by the camera operator, Dustin
3 Wallace (hereinafter referred to as "Wallace").

4 45. Upon information and belief, Big Show was not feigning his emotional
5 outburst at the time of the Attack.

6 46. Upon information and belief, the Attack was observed by other WWE
7 employees, including makeup personnel.

8 47. Shortly after the Attack, Big Show returned in a much subdued state and
9 told Green to redo the "interview." Big Show told Green to ask him to comment on the
10 Match, and he said that he would respond by just walking away.

11 48. Green, fearing any further confrontation with Big Show, complied with Big
12 Show's request. Wallace filmed Big Show walking away after being asked to comment
13 on the Match (hereinafter referred to as the "second interview").

14 49. Shortly thereafter, Wallace located Pankowski and brought him to view the
15 two videotapes that had just been made of Green and Big Show. Pankowski viewed both
16 videotapes.

17 50. Pankowski stated that the videotape of the Attack could not be used
18 because of Big Show's repeated use of profanely indecent language.

19 51. Pankowski told Wallace to discard the second interview which he described
20 as useless.

21 52. A second WWE official, Paul Michael Levesque, a/k/a Hunter Hearst
22 Helmsley, a/k/a "Triple H," (hereinafter referred to as "Triple H") was summoned to
23 view the videotape of the Attack.
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2 53. Upon information and belief, Triple H was, at all relevant times, WWE's
3 Executive Vice-President of Talent and Live Events.

4 54. After viewing the videotape of the Attack, Triple H stated that it could not
5 be used because of Big Show's use of profanity.

6 55. Triple H insisted that Green re-do the "interview."

7 56. Although he was terrified of Big Show, Green felt compelled to do another
8 interview (hereinafter referred to as the "third interview").
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10 57. Triple H asked Big Show to muster the same emotional level for the third
11 interview as he had with the original shoot, that being the Attack. In response, Big Show
12 said that he did not think he would be able to do that because his emotions in the original
13 shoot had been real.

14 58. Prior to the third interview, Big Show told Green not to worry because this
15 time he would not strike him.

16 59. Green conducted Big Show's third interview.

17 60. Pankowski viewed the videotape of the third interview and decided it
18 lacked the emotional impact of the original shoot.

19 61. Pankowski decided to use the original shoot of the Attack with the
20 profanity omitted.

21 62. WWE posted the Attack on its website on Sunday, January 27, 2013.

22 63. At the time WWE caused the Attack to be posted on its website, WWE
23 knew or should have known that the Attack had not been staged.
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2 64. At the time WWE caused the Attack to be posted on its website, WWE
3 knew or should have known that the Attack took place without Green's prior knowledge
4 or consent.

5 65. At the time WWE caused the Attack to be posted on its website, WWE
6 knew or should have known that Green had suffered physical and mental injuries as a
7 direct and proximate result of the Attack.

8 66. While it continued to maintain the Attack on its website, WWE knew or
9 should have known that the Attack had not been staged.

10 67. While it continued to maintain the Attack on its website, WWE knew or
11 should have known that the Attack took place without Green's prior knowledge or
12 consent.

13 68. While it continued to maintain the Attack on its website, WWE knew or
14 should have known that Green had suffered physical and/or psychological, emotional
15 and/or mental injuries as a direct and proximate result of the Attack.

16 69. WWE did not cause the Attack to be removed from the internet until, at the
17 soonest, Tuesday, January 29, 2013.

18 70. The Attack received in excess of one hundred thousand page views while it
19 was posted on the WWE website.

20 71. WWE's purpose for having the Attack posted on the internet was for the
21 commercial benefit of WWE and profit for WWE.
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2 72. WWE intentionally posted and maintained the video on the WWE website
3 even though WWE knew or should have known that it would cause Green to be
4 humiliated and suffer other injuries.

5 73. The next day, January 28, 2013, Green was at the Las Vegas venue for that
6 evening's WWE event, and advised Triple H, Pankowski, and Mark Carrano (of WWE's
7 Talent Relations Department) that he did not want to work with Big Show and wanted
8 WWE to keep Big Show away from him.

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10 74. On January 28, 2013, Triple H verbally apologized to Green for the Attack.

11 75. WWE personnel told Green that Big Show wanted to apologize for the
12 Attack.

13 76. Green informed WWE that he did not wish to have any further contact with
14 Big Show.

15 77. Green informed WWE that he did not want to be anywhere near Big Show.

16 78. WWE knew or should have known that Big Show caused Green physical
17 and mental harm.

18 79. By its actions, WWE intentionally created a dangerous condition that made
19 it more likely for Green's injuries to occur.

20 80. At the time of the Attack, Big Show intended to assault, batter and injure
21 Green.

22 81. At the time of the Attack, Big Show was an employee and/or agent of
23 WWE.
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82. Big Show intended for Green to suffer injuries as a result of the Attack.

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2 83. After the Attack, WWE knew or should have known that Green remained
3 frightened of Big Show and of any further contact with Big Show.

4 84. After the Attack, WWE did not take any appropriate or necessary action to
5 prevent Big Show from attempting to contact Green or to protect Green against further
6 contact with Big Show.

7 85. Over the two days following the Attack, Big Show repeatedly sought out
8 Green, with the knowledge of WWE personnel.

9 86. Over the two days following the Attack, Big Show repeatedly attempted to
10 confront Green, with the knowledge of WWE personnel.

11 87. Over the two days following the Attack, Big Show continued to intimidate
12 Green, with the knowledge of WWE personnel.

13 88. On January 29, 2013, Green advised his direct supervisor, Rob Bernstein,
14 that he was uncomfortable working around Big Show and the other wrestlers, nervous,
15 and had "a ton of anxiety" as a result of the Attack and Big Show's subsequent conduct,
16 and he could no longer remain at the wrestling venue.

17 89. On January 29, 2013, Stephanie McMahon, WWE's Executive Vice
18 President-Creative, contacted Green. Green advised her that he was afraid to work and
19 scared that he would be confronted by Big Show or another wrestler.

20 90. Bernstein offered Green an "800" telephone number to call for assistance.

21 91. Green was unable to continue working on January 29, 2013, because of his
22 mental condition resulting from the Attack, Big Show's subsequent conduct, and WWE's
23 failure to take appropriate and necessary action related to the foregoing.
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COUNT ONE
(Negligence-Big Show)

92. Plaintiffs hereby incorporate by this reference all of the previous paragraphs and allegations of this Complaint as if restated here in full.

93. Big Show owed Green a duty of reasonable care not to conduct himself in a manner such that he would cause harm to Green.

94. Big Show's Attack upon Green was intentional and malicious.

95. Big Show intended to cause injuries to Green as a result of the Attack.

96. Big Show knew or should have known that he posed a physical and mental threat to Green.

97. Big Show knew or should have known that his conduct involved an unreasonable risk of causing physical and mental harm to Green.

98. Big Show knew that there was a substantial likelihood that Green would suffer injuries from the Attack.

99. Big Show breached his duty of care to Green by his conduct as set forth herein.

100. Big Show's breach of duty is a direct and proximate cause of injuries, losses, and damages to Plaintiffs.

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COUNT TWO
(Assault-Big Show)

101. Plaintiffs hereby incorporate by this reference all of the previous paragraphs and allegations of this Complaint as if restated here in full.

102. The Attack by Big Show upon Green was intentional.

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2 103. Big Show intended to cause harm or offensive contact with Green.

3 104. Big Show acted with malice when he attacked Green.

4 105. Big Show intended to cause Green apprehension of an immediate harmful
5 or offensive contact.

6 106. Big Show caused Green apprehension of an immediate harmful or offensive
7 contact.

8 107. Big Show intended for Green to suffer injuries as a result of the Attack.

9 108. Big Show's conduct as set forth herein is a direct and proximate cause of
10 injuries, losses, and damages to Plaintiffs.
11

12 COUNT THREE
13 (Battery-Big Show)

14 109. Plaintiffs hereby incorporate by this reference all of the previous
15 paragraphs and allegations of this Complaint as if restated here in full.

16 110. Big Show intended to cause a harm or offensive contact with Green.

17 111. Big Show intended to cause Green apprehension of an immediate harmful
18 or offensive contact.

19 112. Big Show caused a harmful or offensive contact with Green.

20 113. Big Show intended for Green to suffer injuries as a result of the Attack.

21 114. As set forth herein, Green suffered injuries as a result of the Attack.

22 115. Big Show's conduct as set forth herein is a direct and proximate cause of
23 injuries, losses, and damages to Plaintiffs.
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COUNT FOUR
(Intentional Infliction of Emotional Distress-Big Show)

116. Plaintiffs hereby incorporate by this reference all of the previous paragraphs and allegations of this Complaint as if restated here in full.

117. Big Show acted in an extreme and outrageous manner toward Green.

118. Big Show's conduct was either intentional or reckless.

119. Big Show's conduct caused Green to suffer severe emotional distress.

120. Big Show's conduct as set forth herein is a direct and proximate cause of injuries, losses, and damages to Plaintiffs.

COUNT FIVE
(Negligent Infliction of Emotional Distress-Big Show)

121. Plaintiffs hereby incorporate by this reference all of the previous paragraphs and allegations of this Complaint as if restated here in full.

122. Big Show knew or should have known that his conduct involved an unreasonable risk of causing emotional distress to Green.

123. Big Show knew or should have known that the emotional distress to Green would likely result in illness or bodily injury.

124. Big Show's conduct caused Green to suffer severe emotional distress, anxiety, and upset that manifested itself in physical injury, harm, and illness.

125. Big Show's conduct as set forth herein is a direct and proximate cause of injuries, losses, and damages to Plaintiffs.

COUNT SIX
(Negligence-WWE)

126. Plaintiffs hereby incorporate by this reference all of the previous paragraphs and allegations of this Complaint as if restated here in full.

127. WWE owed Green a duty of reasonable care not to conduct itself in a manner such that it would cause harm to Green.

128. WWE knew or should have known that posting the Attack on the internet involved an unreasonable risk of causing mental harm to Green.

129. WWE knew or should have known that maintaining the Attack on the internet involved an unreasonable risk of causing mental harm to Green.

130. WWE breached its duty of care to Green by its actions as set forth herein.

131. WWE's breach of duty is a direct and proximate cause of injuries, losses, and damages to Plaintiffs.

COUNT SEVEN
(Invasion of Privacy-WWE)

132. Plaintiffs hereby incorporate by this reference all of the previous paragraphs and allegations of this Complaint as if restated here in full.

133. WWE knowingly, intentionally and/or recklessly caused the Attack to be posted on the Internet.

134. WWE knowingly, intentionally and/or recklessly caused the Attack to be maintained on the Internet.

135. WWE's treatment and publication of Green through advertising, marketing and promotion of its internet presence is highly offensive to a reasonable person.

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2 136. WWE's actions were extreme and outrageous.

3 137. WWE had knowledge of or acted in a reckless disregard to the invasion of
4 privacy in which Green was placed.

5 138. WWE knew that there was a substantial likelihood that Green would suffer
6 injuries from the posting of the videotape on the Internet.

7 139. WWE intended to cause injury to Green by posting the videotape on the
8 Internet.

9 140. WWE's actions caused Green to suffer further mental injury,
10 embarrassment, ridicule, and humiliation.

11 141. WWE's conduct as set forth herein is a direct and proximate cause of
12 injuries, losses, and damages to Plaintiffs.
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14 COUNT EIGHT
15 (Intentional Infliction of Emotional Distress-WWE)

16 142. Plaintiffs hereby incorporate by this reference all of the previous
17 paragraphs and allegations of this Complaint as if restated here in full.

18 143. WWE acted in an extreme and outrageous manner toward Green.

19 144. WWE's conduct was either intentional or reckless.

20 145. WWE's conduct caused Green to suffer severe emotional distress.

21 146. WWE's conduct as set forth herein is a direct and proximate cause of
22 injuries, losses, and damages to Plaintiffs.
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COUNT NINE
(Negligent Infliction of Emotional Distress-WWE)

147. Plaintiffs hereby incorporate by this reference all of the previous paragraphs and allegations of this Complaint as if restated here in full.

148. WWE knew or should have known that its conduct involved an unreasonable risk of causing emotional distress to Green.

149. WWE knew or should have known that the emotional distress to Green would likely result in illness and/or emotional or bodily injury.

150. WWE's conduct caused Green to suffer severe emotional distress, anxiety, and upset that manifested itself in physical and/or emotional injury, harm, and illness.

151. WWE's conduct as set forth herein is a direct and proximate cause of injuries, losses, and damages to Plaintiffs.

COUNT TEN
(Commercial Appropriation of Likeness-WWE)

152. Plaintiffs hereby incorporate by this reference all of the previous paragraphs and allegations of this Complaint as if restated here in full.

153. WWE used Green's identity and image concerning the attack to its commercial advantage, without Green's consent, and this use resulted in Green being injured.

154. WWE's conduct as set forth herein is a direct and proximate cause of injuries, losses, and damages to Plaintiffs.

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COUNT ELEVEN
(Unjust Enrichment/Restitution-WWE)

155. Plaintiffs hereby incorporate by this reference all of the previous paragraphs and allegations of this Complaint as if restated here in full.

156. WWE has been unjustly enriched by its wrongful conduct, to the detriment of Green.

157. Green is entitled to restitution and reimbursement of the profits and gains WWE has received through its wrongful conduct and exploitation of Green.

COUNT TWELVE
(Intentional Tort-WWE)

158. Plaintiffs hereby incorporate by this reference all of the previous paragraphs and allegations of this Complaint as if restated here in full.

159. WWE intentionally posted the videotape on the Internet.

160. WWE knew that there was a substantial likelihood that Green would suffer injuries from the posting of the videotape.

161. WWE intended for Green to suffer injuries, including humiliation, as a result of the posting of the videotape on the Internet.

162. WWE's actions caused Green to suffer the injuries alleged herein.

COUNT THIRTEEN
(Accounting/Constructive Trust-WWE)

163. Plaintiffs hereby incorporate by this reference all of the previous paragraphs and allegations of this Complaint as if restated here in full.

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2 164. WWE exploited Green for its own commercial gain without providing
3 Green any equitable share of the profits or royalties nor any restitution or reimbursement
4 for monies rightfully owed to Green.

5 165. Green is entitled to (1) an accounting; (2) a constructive trust; and, (3) an
6 equitable distribution of profits from the use of his image and likeness in advertising,
7 marketing, and promotions.

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9 COUNT FOURTEEN
(Negligent Hiring-WWE)

10 166. Plaintiffs hereby incorporate by this reference all of the previous
11 paragraphs and allegations of this Complaint as if restated here in full.

12 167. WWE had a duty to employ only those people who do not pose an
13 unreasonable risk of harm to others.

14 168. WWE breached its duty by employing Big Show, an improper person.

15 169. WWE knew or should have known that employing Big Show involved an
16 unreasonable risk of causing injury to others.

17 170. WWE employing Big Show resulted in harm to Green.

18 171. WWE employing Big Show is a direct and proximate cause of injuries,
19 losses, and damages to Plaintiffs.
20

21 COUNT FIFTEEN
22 (Negligent Retention-WWE)

23 172. Plaintiffs hereby incorporate by this reference all of the previous
24 paragraphs and allegations of this Complaint as if restated here in full.

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2 173. WWE had a duty to terminate the employment of people who posed an
3 unreasonable risk of harm to others.

4 174. WWE breached its duty by retaining Big Show, an improper person.

5 175. WWE knew or should have known that retaining Big Show involved an
6 unreasonable risk of causing injury to others.

7 176. WWE retaining Big Show resulted in harm to Green.

8 177. WWE retaining Big Show is a direct and proximate cause of injuries,
9 losses, and damages to Plaintiffs.
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11 COUNT SIXTEEN
12 (Negligent Training/Supervision-WWE)

13 178. Plaintiffs hereby incorporate by this reference all of the previous
14 paragraphs and allegations of this Complaint as if restated here in full.

15 179. WWE had a duty to properly train and supervise Big Show to properly deal
16 with confrontations inevitable to his position and to not cause harm to others.

17 180. WWE breached its duty by failing to properly train and supervise Big
18 Show.

19 181. WWE failed to exercise proper control over Big Show to prevent harm to
20 Green.

21 182. WWE knew or should have known that failing to properly train and
22 supervise Big Show involved an unreasonable risk of causing injury to others.

23 183. WWE gave improper or ambiguous orders to Big Show.

24 184. WWE failed to make proper regulations of Big Show.

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2 185. WWE permitted or failed to prevent negligent and other tortious conduct by
3 Big Show.

4 186. WWE failing to properly train and supervise Big Show is a direct and
5 proximate cause of injuries, losses, and damages to Plaintiffs.

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COUNT SEVENTEEN
(Compensatory Damages)

187. Plaintiffs hereby incorporate by this reference all of the previous paragraphs and allegations of this Complaint as if restated here in full.

188. As a direct and proximate result of Defendants' actions and failures to act as set forth herein, Plaintiff Andrew Green suffered the following foreseeable injuries, losses, and damages:

- a. Green suffered personal injuries, including physical, emotional, and psychological, the full extent of which are yet unknown. Certain of these injuries to Green are chronic, irreversible, and permanent in nature.
- b. Green suffered great bodily pain and mental anguish, discomfort, and disability. This will continue into the future and permanently as Green's condition is chronic, irreversible, and permanent in nature.
- c. Green incurred reasonable expenses for necessary medical care and treatment, the exact amount of which is presently unknown, but which will be proven at the time of trial. Green will continue to incur reasonable expenses for necessary medical care and treatment into the future and permanently.

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- 2 d. Green suffered monetary damages in the form of costs and expenses for
- 3 transportation while traveling to receive necessary medical care and
- 4 treatment, the exact amount of which is presently unknown, but which will
- 5 be proven at the time of trial. Green will continue to incur these expenses
- 6 for transportation to receive necessary medical care and treatment into the
- 7 future and permanently.
- 8
- 9 e. Green suffered monetary damages in the form of a loss of income, benefits,
- 10 and of earning capacity, the exact amount of which is presently unknown,
- 11 but which will be proven at the time of trial. This loss of income, benefits,
- 12 and of earning capacity will continue into the future and permanently.
- 13
- 14 f. Green lost the present capacity to earn a living. Green is presently unable to
- 15 accurately estimate such loss of earning capacity and, therefore, will prove
- 16 such a loss in an ascertainable amount upon the trial in this matter.
- 17
- 18 g. Green's future earning capacity has been diminished. Green is presently
- 19 unable to accurately estimate such loss of future earning capacity and,
- 20 therefore, will prove such a loss in an ascertainable amount upon the trial in
- 21 this matter.
- 22
- 23 h. Green has been deprived of the full enjoyment of life, and the same will
- 24 continue into the future and permanently.
- i. Green suffered intimidation, fright, humiliation, and embarrassment.
- j. Green suffered physical manifestation of emotional distress including sleeplessness.

COUNT EIGHTEEN
(Loss of Consortium)

189. Plaintiffs hereby incorporate by this reference all of the previous paragraphs and allegations of this Complaint as if restated here in full.

190. As a direct and proximate result of Defendants' actions and failures to act as set forth herein, Plaintiff Staci Green was and continues to be deprived of the society, companionship, assistance, services, and enjoyment of Plaintiff Andrew Green, her husband, this being a foreseeable consequence of Defendants' conduct.

COUNT NINETEEN
(Punitive/Exemplary Damages)

191. Plaintiffs hereby incorporate by this reference all of the previous paragraphs and allegations of this Complaint as if restated here in full.

192. Defendant Big Show intended to cause injury.

193. Defendant Big Show's wrongful conduct was motivated by spite or ill will.

194. Defendant WWE acted to serve its own interests, having reason to know and consciously disregarding a substantial risk that its conduct might significantly injure the rights of others.

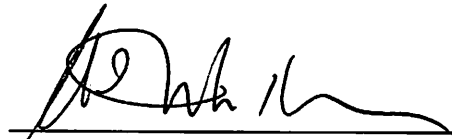
195. Defendant WWE intentionally created dangerous conditions that made it substantially likely Green's injuries would occur.

196. Both Defendant Big Show and Defendant WWE consciously pursued a course of conduct knowing that it created a substantial risk of significant harm to others.

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2 WHEREFORE, Plaintiffs Andrew Green and Staci Green demand judgment
3 against Defendants named herein for damages in an amount to be proven at trial that fully
4 and adequately compensates Plaintiffs, for punitive and exemplary damages against all
5 Defendants, for an accounting of profits; for restitution/equitable distribution of
6 commercial profits; for constructive trust; for all costs and expenses incurred herein,
7 including reasonable attorneys' fees, for pre-judgment and post-judgment interest at the
8 maximum rate allowed by law, and for such other and further relief to which Plaintiffs
9 may be entitled either at law or in equity, or as the Court may deem just in the premises.
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11 DATED this 5th day of April 2013.

12 MUELLER LAW GROUP, P.A.

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16 George E. Mueller
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