

# **EXHIBIT 1**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

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|                          |   |                   |
|--------------------------|---|-------------------|
| OLIVER LUCK              | : | CIVIL NUMBER:     |
|                          | : | 3:20-CV-516 (VAB) |
| Plaintiff                | : |                   |
|                          | : |                   |
| VS.                      | : |                   |
|                          | : |                   |
| VINCENT K. MCMAHON and   | : |                   |
| ALPHA ENTERTAINMENT, LLC | : |                   |
|                          | : |                   |
| Defendants.              | : |                   |

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DEPOSITION OF: VINCENT K. MCMAHON  
DATE: MAY 13, 2021  
HELD AT: SHIPMAN & GOODWIN LLP  
300 ATLANTIC STREET  
STAMFORD, CONNECTICUT

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 25 Rocco Mercurio, Videographer, Vertitext New York

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 12 retained by Mr. Dombrowski.)  
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1 (The deposition commenced at 9:13 a.m.)  
 2 COURT REPORTER: Attorney McDevitt,  
 3 did you want a copy of the transcript?  
 4 MR. MCDEVITT: Yes.  
 5 COURT REPORTER: Attorney Mueller,  
 6 did you want a copy of the transcript?  
 7 MR. MUELLER: Yes, please.  
 8 COURT REPORTER: Thank you.  
 9 MR. MUELLER: Do you know exactly  
 10 when it might be available?  
 11 COURT REPORTER: Whenever you need  
 12 it. Is Monday okay?  
 13 MR. MUELLER: Yes.  
 14 MR. MERCURIO: We are now going on  
 15 the record. Today's date is May 13, 2021. The time  
 16 is approximately 9:13. This is the video deposition  
 17 of Vincent K. McMahon in the matter of Oliver Luck  
 18 versus Vincent McMahon and Alpha Entertainment LLC  
 19 filed in the U.S. District Court of Connecticut, case  
 20 number 3:20-CV-516.  
 21 My name is Rocco Mercurio, and the  
 22 court reporter is Jackie McCauley. Will counsel  
 23 please introduce yourselves and who you represent for  
 24 the record.  
 25 MR. DOBROWSKI: Paul Dobrowski for

REDACTED

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1 plaintiff, Oliver Luck.  
2 MR. ZEITLIN: Andrew Zeitlin of  
3 Shipman & Goodwin for the plaintiff, Oliver Luck.  
4 MS. KATZ: Joette Katz for the  
5 plaintiff, Oliver Luck.  
6 MS. GLEASON: Sarah Gleason for the  
7 plaintiff, Oliver Luck.  
8 MR. MCDEVITT: Jerry McDevitt for  
9 the defendant, Vince McMahon and Alpha Entertainment.  
10 MR. MUELLER: Jeffrey Mueller for  
11 the defendant, Vince McMahon and Alpha Entertainment.  
12 MR. MERCURIO: The court reporter  
13 will now swear in the witness, and we can proceed.  
14 VINCENT K. MCMAHON, Deponent, having first  
15 been duly sworn, deposes and states as follows:  
16 COURT REPORTER: Name and address,  
17 please.  
18 MR. MCMAHON: Vincent Kennedy  
19 McMahon  
20 DIRECT EXAMINATION BY MR. DOBROWSKI:

REDACTED

7 Q. When did you stop -- well, strike that.  
8 What was your position with Alpha prior to bankruptcy?  
9 A. Owner.  
10 Q. Were you chairman of Alpha as well?  
11 A. I was the owner.  
12 Q. Okay. Did you have any title such as  
13 chairman or ex officio chairman?  
14 A. I might have, but I was the owner.  
15 Q. Okay. And to you what did you understand  
16 being the owner meant?  
17 A. The owner meant that everyone would follow  
18 my directive. They would follow the tenet of the way  
19 that WWE began, I'm sorry, that the way Alpha began,  
20 that is, that I said in my opening remarks to the  
21 media that the quality of the human being was as  
22 important as the quality of the player.  
23 Q. Right. So the person who had been  
24 criminally charged with a felony would not be  
25 permitted to play in the XFL, right?

REDACTED

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1 A. Yes.

2 Q. And, I'm sorry, sir, were you ever

3 criminally charged previous to starting the XFL in

4 2018?

5 A. Was I prior to this?

6 Q. Yeah.

7 A. I was and acquitted.

8 Q. I didn't ask if you were acquitted. I

9 asked if you were criminally charged.

10 A. I was and acquitted.

11 Q. What were you criminally charged with?

12 A. A charge that someone has never been

13 charged with before or since. It was something along

14 the lines of deceiving the FDA in some capacity and

15 things along those lines.

16 Q. Okay. And, again, I'm not a criminal

17 lawyer like Mr. McMahon, but was that a felony charge?

18 A. It would have been, yes.

19 Q. And so if a person had your background as

20 a player, would they have been disqualified from being

21 employed by the XFL?

22 A. If, in fact, someone had been charged with

23 a felony?

24 Q. Yeah.

25 A. If, in fact -- yes, they would have been.

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1 Q. And that would have meant that by being

2 charged with a criminal felony such as yourself, they

3 were not men of good character, as you phrased it,

4 right?

5 MR. MCDEVITT: Object to the form

6 and foundation.

7 Q. You can answer.

8 A. That's correct.

9 Q. Okay. So under your definition of the WWE

10 standard you were not a man of good character, true?

11 MR. MCDEVITT: Object to the form.

12 You used WWE there.

13 Q. You're right. Thanks, Jerry. Under your

14 definition of that applied to XFL employees and

15 players particularly, you were not a man of good

16 character, true?

17 MR. MCDEVITT: Object. That's

18 argumentative.

19 Q. You can answer.

20 A. As an employer, I would not have been

21 allowed to play.

22 Q. But it was okay for you to be the owner,

23 right, with that criminal charge, right?

24 MR. MCDEVITT: Argumentative.

25 A. I was the owner.