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Sent via Electronic Mail

Daniel J. Toal
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Jessica T. Rosenberg
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Edward M. Brennan
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18534 N. Dale Mabry Hwy
Lutz, FL 33548

Re: Call for WWE to Release Former and Current Employees and Contractors from Non-Disclosure Agreements

Dear Mr. Toal, Ms. Rosenberg, and Mr. Brennan:

World Wrestling Entertainment, LLC (“WWE”) has said that it “takes Ms. Grant’s allegations very seriously and has no tolerance for any physical abuse or unwanted physical contact.” In other words, WWE would like the world to believe that it has reformed its workplace culture. But if WWE is truly committed to change, it must allow survivors to speak their truth without fear of reprisal. We call upon WWE to publicly waive enforcement of its non-disclosure agreements (“NDAs”) to allow its former and current employees and contractors (including wrestlers contracted to perform under the WWE brand) to speak out about sexual misconduct, sexual assault, harassment, and workplace aggression or disputes concerning the toxic culture at WWE. This includes releasing women who signed NDAs related to sexual misconduct by former CEO Vince McMahon, John Laurinaitis and other WWE leadership and employees as conditions of settlement.

The toxic and sexualized culture at WWE during Mr. McMahon’s tenure as CEO and Chairman was open and notorious. Yet what has been publicly reported is only part of the picture. We have had witnesses come to us confidentially and describe a sexualized culture at WWE that victimizes women and men. We have received reports that many victims are currently afraid to come forward because of punitive non-disclosure and non-disparagement agreements. For example, as *The Wall Street Journal* reported on July 8, 2022, Mr. McMahon paid over \$12 million to at least four women to secure their silence about his sexual misconduct. Our client is just one of an untold many. We therefore also ask Vince McMahon and John Laurinaitis to affirm that survivors and WWE employees

who witnessed abuse may speak about their experiences without fear of retribution and retaliation.

WWE cannot move on from its sordid past while its victims remain silenced. Survivors deserve an opportunity to share their experiences on their terms. Forced silence only deepens the wounds of sexual abuse. Survivors are revictimized every time they are muzzled and forced to live in fear of attack from a multi-billion-dollar business that can hire an army of lawyers to bury them in legal fees if they speak the truth. Even unenforceable NDAs, like the one our client was coerced to sign, have a chilling effect because individuals do not have the will or resources to fight them. WWE must clarify that any NDAs that it has entered are not intended to prevent disclosure of sexual misconduct, abuse, or assault, and disclaim and waive any claims it may have under those NDAs if current or former employees and contractors choose to speak out.

We urge WWE to quickly and proactively release its current and former employees and contractors from any obligations under any WWE-executed NDA that would prevent them from discussing sexual misconduct, abuse, or assault during their time at WWE without delay. WWE wants people to believe the company has changed—this is its chance to prove it.

Regards,



Ann E. Callis

Copy to:

Nick Khan, WWE
Paul Levesque, WWE
Ari Emanuel, Endeavor
Vince McMahon
John Laurinaitis
Jerry S. McDevitt, K&L Gates LLP