

CONFIDENTIAL

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1 Docket No: X05-CV-00-0180933-S Vol. 5
2 -----:
3 STANLEY SHENKER & : SUPERIOR COURT
ASSOCIATES, INC., : COMPLEX
4 : LITIGATION DOCKET
5 Plaintiff, :
: AT STAMFORD
6 :
vs. :
7 :
WORLD WRESTLING FEDERATION :
8 ENTERTAINMENT, INC., :
9 Defendant. :

10 -----x
11 One Canterbury Green
Stamford, Connecticut
12 March 20, 2003
9:30 a.m.

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16 CONTINUED EXAMINATION BEFORE TRIAL
17 of STANLEY SHENKER, the Plaintiff in the
18 above-titled action, held at the above time and
19 place, before a Notary Public of the State of New
20 York.

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22
23 Eileen Mulvenna,
24 CSR/RMR

1 Stanley Shenker 1056
2 Q. Whatever payments you received on
3 that went through Stanfull in your Hong Kong bank
4 account; correct?
5 A. That would have been correct, yes.
6 Q. So we have now identified over the
7 last two days two additional licensees who paid
8 you through Stanfull Industries and that Hong
9 Kong bank account; correct: Toy Island and now
10 Ring Side; is that correct?
11 A. I believe that's correct.
12 Q. And when I asked you in your first
13 day of deposition whether you owned any other
14 corporations, you lied and said no; correct?
15 A. Back in May?
16 Q. Yes.
17 A. Yes. I mislead you.
18 Q. And you did that deliberately;
19 right?
20 A. Yes, I did.
21 Q. And you didn't want me to know about
22 Stanfull, did you?
23 A. That's correct.
24 Q. You didn't want me to know about
25 Stanfull because once you learn about Stanfull,

1 Stanley Shenker 1058
2 about Trinity; correct?
3 A. I don't remember what you mean --
4 when amended --
5 Q. Changed the answers that you had
6 given in your previous sworn interrogatories and
7 disclosed an arrangement with Trinity the day
8 before you testified the first time, didn't you?
9 A. Are you going back all the way to
10 last May?
11 Q. Yes.
12 A. I don't remember if we changed it
13 the day before. I don't remember that.
14 Q. You have to have a pretty good
15 memory to be a liar, don't you?
16 MR. NOLIN: Object to the form.
17 Q. You can't remember all the lies you
18 told, can you?
19 A. If you mean that to say you can't
20 remember all the lies you told and how to keep it
21 things straight and all the changes, I agree with
22 you. That's one of the reasons I said this is --
23 well --
24 Q. So you knew back as early as May
25 that you wanted to hide the existence of

1 Stanley Shenker 1057
2 you learn about licensee payments through Hong
3 Kong bank accounts that Stanfull owns; correct?
4 A. No.
5 Q. Why didn't you want me to know about
6 Stanfull?
7 A. Because it was just my other
8 businesses and didn't pertain to the claim with
9 WWF.
10 Q. You knew we were claiming that you
11 had been receiving payments from licensees,
12 didn't you?
13 A. If -- you're claiming what?
14 Q. Just what I said, you knew we were
15 claiming you were taking payments from licensees;
16 you knew that, didn't you?
17 A. Not for product development.
18 Q. You knew we were claiming you took
19 money from licensees, didn't you, Mr. Shenker?
20 A. I -- I knew that you were claiming I
21 took money from licensees based on them -- on the
22 WWE, is that what you're saying?
23 Q. In fact, the day before you came in
24 and testified originally, you amended your
25 interrogatories to disclose only information

1 Stanley Shenker 1059
2 Stanfull; correct?
3 A. I knew -- I knew I wanted to keep
4 Stanfull private, yes.
5 Q. And as recently as February 18th of
6 2003, after you say you formed the intent to come
7 clean, you're still lying about payments that you
8 had received from licensees in sworn Answers to
9 Interrogatories, weren't you, Mr. Shenker?
10 A. That was -- the questions were as
11 pertained to me and I answered them was about the
12 payments received for getting the WWF license.
13 Q. Did you file amended answers to the
14 third set of interrogatories that we had served
15 on you on February 18th of 2003, Mr. Shenker?
16 A. I don't remember the exact dates,
17 but --
18 Q. Approximately a month ago,
19 Mr. Shenker.
20 A. Yes, approximately a month.
21 Q. Do you remember doing that?
22 A. End of January. February.
23 Q. Do you remember updating the
24 response you gave about the arrangement you
25 claimed and now admit existed with Mr. Goetz?