

# **EXHIBIT A**

**UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT**

WORLD WRESTLING  
ENTERTAINMENT, INC,

Civil Action No.  
3:10-CV-1399 (CFD)

Plaintiff,

v.

J.F. RAMOS -  
REPRESENTAÇÕES, LDA

Defendant.

FEBRUARY 4, 2011

**DECLARATION OF ANTÓNIO ZORRO IN SUPPORT OF DEFENDANT  
J.F. RAMOS REPRESENTAÇÕES, LDA'S  
MOTION TO DISMISS OR IN THE ALTERNATIVE STAY PROCEEDINGS**

I, António Zorro, having been duly sworn, state as follows:

1. I am over the age of eighteen and believe in the obligations of an oath.
2. I am an attorney for J.F. Ramos Representações, LDA ("J.F. Ramos") and am familiar with both the action currently pending in the District of Connecticut and the action on the merits currently pending in the Paris Court of First Instance (Tribunal de Grande Instance de Paris).
3. In 2009, J.F. Ramos manufactured products containing WWE's intellectual property. Holograms for those products had been supplied by the WWE official supplier to J.F. Ramos, after WWE authorization and J.F. Ramos payment.
4. Still in 2009, a French company, Sun City CIE DND ("Sun City"), contacted J.F. Ramos to buy those products. The transaction occurred in Portugal.

5. J.F. Ramos included the products sold to Sun City in its 2009 annual declaration of sales to WWE and paid the applicable royalties to the European licensing agent of WWE, CPLG. Such payment was accepted.

6. After WWE received complaints from other European licensees that Sun City was selling WWE products in the French market, WWE sent cease and desist letters to Sun City and the companies to which Sun City had sold merchandise.

7. In response to WWE's cease and desist letters, Sun City filed an action in the Commercial Court of Paris (Tribunal de Commerce de Paris) and an action on the merits in the Paris Court of First Instance (Tribunal de Grande Instance de Paris).

8. In May 2010, Sun City filed, in the Commercial Court of Paris, an injunction against Scemama SNC and Scemama International SARL, requesting documents relating to transactions with Lamaloli GMBH, TVMania GMBH and WWE that could demonstrate any illegal activity (namely, unfair competition and trade practices in violation of European Union trade laws). A court order was obtained in June and was executed by the bailiff. In July 2010, WWE, Scemama SNC and Scemama International SARL filed complaint and sought the withdrawal of the court order before the Commercial Court of Paris. On 29 September 2010, such complaints were rejected.

9. In October 2010, an appeal on the injunction was filed in the Paris Court of Appeal (Cour d'Appel de Paris). This is not an appeal on the merits of the case but rather an appeal of the court's order that defendants produce documents. WWE has not yet filed its appellate brief. Oral argument before the Court of Appeals of Paris will likely occur during May of 2011.

10. In June 2010, Sun City filed the action on the merits before the Paris Court of First Instance ("Tribunal de Grande Instance de Paris") against Scemama SNC, Scemama International SARL, Lamaloli GMBH, TVMania GMBH and WWE alleging anti-competitive practices and requesting the cancelation of several trademarks.

11. In 13 October 2010, a motion was filed by Sun City so that the Court could have access and use the data seized on the injunction. All the other parties contested and objected to such discovery motion. A decision on this motion is expected during next month.

12. The proceedings regarding the action on the merits are only in the very beginning stages. None of the defendants in the action, including WWE, have filed responsive pleadings on the merits.

13. It is anticipated that a resolution of Sun City's action on the merits may take between eighteen and thirty months.

Dated: February 4, 2011

  
Antonio Zorro

**ANTÓNIO ZORRO**  
ABVOGADO  
Cont. Fiscal Nº 140.624.791  
Estrada Nacional, Nº 123, n.º 144  
2625-113 BALÇA DA BANHEIRA  
Tel: 212 499.808 Fax: 212 940.920