

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KEVIN FOOTE (aka Kevin Kelly),  
Individually and on behalf of all others  
similarly situated;

BRANDON TATE, Individually and  
on behalf of all others similarly  
situated; and

BRENT TATE, Individually and on  
behalf of all others similarly situated;

Plaintiffs,

v.

ALL ELITE WRESTLING, LLC;

IAN RICCABONI; and

TONY KHAN;

Defendants.

Civil Action No. \_\_\_\_\_

**DECLARATION OF CHRIS HARRINGTON**

I, Chris Harrington, declare that I am of full age and that, if called upon to testify under oath, I could and would testify competently to the following:

1. I currently serve in the position of Senior Vice President for Business Strategy for All Elite Wrestling, LLC ("AEW"). I make this declaration based upon my knowledge of AEW's operations and my review of AEW's business records.

2. Between September 1, 2022, and the present, 290 individuals (the “Putative Class Members”) provided services to AEW as wrestlers or as non-wrestling talent under independent-contractor agreements.

3. The Putative Class Members reside in diverse states. Based on AEW’s records, only ten of the Putative Class Members, or 3.4%, have last-known addresses within the Commonwealth of Pennsylvania.

4. Between September 1, 2022, and the present, AEW paid the Putative Class Members more than \$60,000,000 in the aggregate.

5. If the Putative Class Members were reclassified as employees, then AEW would incur tax liability of at least 9.95% of the pay rendered to Putative Class Members, meaning more than \$5,970,000 in the aggregate.

6. If the Putative Class Members were reclassified as employees, then AEW would incur costs in connection with employee benefits of approximately \$18,125 annually per employee, meaning \$5,256,250 per year in the aggregate.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my personal knowledge. Executed on October 4, 2024.

A handwritten signature in black ink, appearing to read "Chris Harrington", written over a horizontal line.

Chris Harrington  
Senior Vice President, Business Strategy  
All Elite Wrestling, LLC