

EXHIBIT 3

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

PAPA BERG, INC. and JAMES D. PAPA
d/b/a PAPA HAYES MUSIC d/b/a PAPA
BERG PUBLISHING d/b/a GRAND
THEFT PRODUCTIONS d/b/a GRAND
THEFT RECORDS d/b/a NABE NABE
MUSIC,

Plaintiffs,

v.

WORLD WRESTLING
ENTERTAINMENT, INC., STEPHANIE
MUSIC PUBLISHING INC., MICHAEL
SEITZ a/k/a MICHAEL HAYES, and
JAMES ALAN JOHNSTON,

Defendants.

CIVIL ACTION NO. 3:12-cv-02406-B

AFFIDAVIT OF MICHAEL SEITZ

State of Connecticut)
) ss:
County of Fairfield)

I, Michael Seitz, being first duly sworn, hereby depose and say:

1. I am over eighteen (18) years of age, have personal knowledge of the matters set forth herein and am competent to testify thereto.

2. I am employed as the Vice President, Creative Writing/Booking of World Wrestling Entertainment, Inc. ("WWE"). In that capacity, I assist in the development, writing, and production of storylines for WWE television programming and live events.

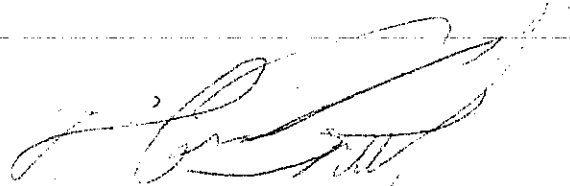
3. For many years I was professional wrestler, performing under the ring name "Michael Hayes." I am best known for being a member of a tag team known as "The Freebirds," which performed for a number of different wrestling promotions, including World Class Championship Wrestling and World Championship Wrestling.

4. The Freebirds are particularly known for their pioneering use of music in connection with their entrance to wrestling matches. In that connection, I co-wrote, along with James Papa, an entrance song for The Freebirds called "Badstreet USA." I also sang lead vocals on the recording of "Badstreet USA." Due to the success of "Badstreet USA," I went on to co-write, along with James Papa and various other individuals, a number of other entrance songs for various wrestlers. Specifically, I co-wrote all of the songs that are identified as "Protected Works" in the Complaint in the above-referenced lawsuit. I am registered and credited as a co-writer of these songs with Broadcast Music, Inc.

5. I live and reside in Stockbridge, Georgia. In connection with my job responsibilities on behalf of WWE, I travel each week to WWE's television tapings at live events in cities throughout the United States and around the world. I also have an office in WWE's corporate headquarters in Stamford, Connecticut in which I generally work several days out of each month.

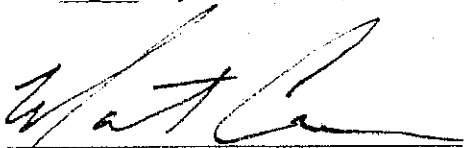
6. Although I have always maintained my residence in Georgia, for several years in the mid-1980s, I commuted to Dallas, Texas generally for two weeks blocks of time (then returning to my home in Georgia for a week off) while I was wrestling for World Class Championship Wrestling. During those trips to Dallas, I stayed at the home of James Papa. I left World Class Championship Wrestling in 1988, and have not had any substantive contacts with Texas in the last 25 years.

7. I do not own, and have never owned, any real estate in Texas.
8. In the last 25 years, I have not leased any property in Texas.
9. In the last 25 years, I have not paid any taxes to Texas.
10. In the last 25 years, have not had a bank account in Texas.
11. In the last 25 years, I have not had a telephone listing in Texas.
12. In the last 25 years, I have not had a driver's license issued by Texas or a motor vehicle registered in Texas.
13. I have never maintained an office in Texas nor have I ever designated an agent for service of process in Texas.
14. I do not regularly transact business in Texas.
15. In connection with my job responsibilities on behalf of WWE, I have travelled to Texas on a handful of occasions each year for WWE television tapings at live events in Texas. For example, I attended eight WWE live events in Texas in each of 2011 and 2012.
16. I have not been served with the complaint or a summons in the above-referenced lawsuit.



Michael Seitz

Subscribed and sworn to before me
this 8 day of October, 2012.



Notary Public

My Commission Expires: 9/30/14

