

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT**

OLIVER LUCK

*Plaintiff*

v.

VINCENT K. MCMAHON and ALPHA  
ENTERTAINMENT LLC

*Defendants.*

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CIVIL NO. 3:20-cv-516 (VAB)

December 22, 2020

**PLAINTIFF’S AMENDED MOTION FOR DISCLOSURE OF ASSETS**

Pursuant to Rule 64 of the Federal Rules of Civil Procedure, Rule 4(c) of the Local Rules of Civil Procedure for District of Connecticut, and Connecticut General Statutes § 52-278n, plaintiff Oliver Luck, having filed an application for a prejudgment remedy in this action, hereby respectfully moves for an Order requiring defendant Vincent McMahon to appear at the offices of Shipman & Goodwin LLP, 300 Atlantic Street, Stamford, Connecticut 06901, in order to be examined under oath within forty-five days of such order in connection with the relief requested herein.

The Plaintiff further moves for an Order of this Court requiring the defendant, within thirty days of such order, to disclose assets and property in which he has an interest, or debts owing to him, wherever located, sufficient to satisfy a prejudgment remedy to secure the sum of \$23.8 million to attach and/or garnish sufficient property of the defendant, including but not limited to the following:

1. All bank accounts, certificates of deposit, trust accounts, or similar types of accounts of defendant, or in which defendant has an interest, including addresses for applicable bank offices and account numbers;

2. All real property in which defendant has an interest, including the location and nature of said interest;

3. All non-exempt personal property (including but not limited to automobiles, boats, aircraft, art, jewelry, collectibles, and club memberships) in which defendant has an interest, including a description of the property, its location, and the nature of the interest in the property.

4. All business or investment entities (including both holding and operating entities) of any kind or description in which defendant has an interest, including but not limited to a membership interest, a limited partnership interest, an equity interest, or any other interest of any type, including a description of such interest and the name and address of the officers, members, partners, or shareholders in such entities;

5. All stocks, bonds, or negotiable securities in which defendant has an interest, including a description of the stock, bond, or negotiable security, its location, and the nature of the interest in the stock, bond, or negotiable security;

6. All funds in which defendant has an interest, including private and SBIC funds, and a description of the fund, and the nature of defendant's interest in the fund;

7. All cash or cash equivalents in which defendant has an interest, including the amount and location of said cash or cash equivalents;

8. All royalties in which defendant has an interest, including a description of the amount of such royalty, and the name, address, telephone number, and email address of the individual or entity obligated to pay such royalties; and

9. All other property, real or personal, tangible or intangible, liquid or otherwise in which defendant has an interest of any kind whatsoever and wherever located.

The Plaintiff further moves for an Order of this Court requiring the defendant, within thirty days of such order, to produce such documents that in any way relate to all assets, property, and debts as described above.

This motion is accompanied by an Application for Prejudgment Remedy, filed herewith, and a proposed order granting this motion, which is attached hereto as Exhibit 1.

WHEREFORE, the plaintiff respectfully requests that this Court grant this motion and order the requested disclosure of assets, order the defendant to appear for a deposition in connection with the relief requested herein, and to produce such documents that in any way relate to all assets, property, and debts as described above, together with such other and further relief as the Court deems just and proper.

*Signature of counsel on following page.*

**PLAINTIFF OLIVER LUCK**

*/s/ Paul J. Dobrowski*

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Paul J. Dobrowski (phv10563)  
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**AND**

*/s/ Andrew M. Zeitlin*

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***HIS ATTORNEYS***

**CERTIFICATE OF SERVICE**

I hereby certify that on December 22, 2020, a copy of the foregoing Amended Motion for Disclosure of Assets was filed electronically and served on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system, or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Andrew M. Zeitlin

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