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17 *Attorneys for Defendant World*  
18 *Wrestling Entertainment, Inc.*

19 UNITED STATES DISTRICT COURT  
20 CENTRAL DISTRICT OF CALIFORNIA

21 RUSS McCULLOUGH, A/K/A “Big Russ  
22 McCullough,” RYAN SAKODA, and  
23 MATTHEW R. WIESE, A/K/A “Luther  
24 Reigns,” individually and on behalf of all  
25 others similarly situated,

26 Plaintiffs,

27 vs.

28 WORLD WRESTLING  
ENTERTAINMENT, INC.,

Defendant.

Case No. 2:15-cv-02662-AB-JEM

**WORLD WRESTLING  
ENTERTAINMENT, INC.’S  
NOTICE OF MOTION AND  
MOTION TO TRANSFER VENUE  
DUE TO MANDATORY FORUM  
SELECTION CLAUSES IN THE  
CONTRACTS BETWEEN THE  
PARTIES**

**Judge:** Hon. André Birotte, Jr.

**Date:** July 13, 2015

**Time:** 10:00 a.m.

**Place:** Courtroom 4

1 **TO PLAINTIFFS AND THEIR ATTORNEYS OF RECORD HEREIN:**

2 **PLEASE TAKE NOTICE THAT** on July 13, 2015, at 10:00 a.m., or as soon  
3 thereafter as the matter may be heard, in Courtroom 4 of the above-captioned court  
4 located at 312 North Spring Street, Los Angeles, California 90012, Defendant World  
5 Wrestling Entertainment, Inc. (“WWE”) will and hereby does move this Court for an  
6 order transferring this case to the U.S. District Court for the District of Connecticut  
7 due to mandatory forum-selection clauses in the contracts between the parties.

8 WWE’s motion to transfer venue pursuant to 28 U.S.C. § 1404(a) should be  
9 granted because Plaintiffs are subject to mandatory forum-selection clauses in each of  
10 their contracts with WWE that require this dispute to be litigated in the District of  
11 Connecticut. Under the U.S. Supreme Court’s decision in *Atlantic Marine Constr.*  
12 *Co., Inc. v. United States Dist. Ct. for W. Dist. of Tex.*, 134 S. Ct. 568, 582-83 (2013),  
13 those forum-selection clauses should be given controlling effect.

14 This Motion is based upon this Notice of Motion; WWE’s Memorandum of  
15 Points and Authorities; the accompanying Declarations of James W. Langham and  
16 Geoffrey M. Davis, and the pleadings, records and files herein; all matters of which  
17 judicial notice may be taken; and upon such additional evidence or argument as the  
18 Court may receive at or before the hearing on this Motion. This Motion is made  
19 following a conference between WWE’s counsel and Plaintiffs’ counsel pursuant to  
20 L.R. 7-3 on May 7, 2015.

21 K&L Gates LLP

22  
23 Dated: May 14, 2015

24 By: /s/ Geoffrey M. Davis  
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**PROOF OF SERVICE**

1  
2 The undersigned hereby declares that the foregoing document was filed through  
3 the Electronic Court Filing system on May 14, 2015, and a copy thereof will be sent  
4 electronically to the registered recipients and counsel of record as identified in the  
5 Notice of Electronic Filing.

6  
7 /s/Geoffrey M. Davis  
8 Geoffrey M. Davis  
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