

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

EVAN SINGLETON and VITO
LOGRASSO, individually and on behalf
of all others similarly situated,

Plaintiffs,

vs.

WORLD WRESTLING
ENTERTAINMENT, INC.,

Defendant.

Case No. 3:15-cv-00425-VLB

JOINT MOTION FOR MODIFICATION OF CASE SCHEDULING DEADLINES

Plaintiffs Evan Singleton and Vito LoGrasso and Defendant World Wrestling Entertainment, Inc. (“WWE”) hereby jointly move the Court to modify the existing case scheduling deadlines in this matter, and in support thereof, state as follows:

1. On January 16, 2015, Plaintiffs filed a putative class action Complaint against Defendant in the United States District Court for the Eastern District of Pennsylvania. (Dkt. # 1).

2. On February 27, 2015, Defendant filed a Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404(a) Due to the Forum-Selection Clauses in the Contracts Between the Parties (the “Motion to Transfer”). (Dkt. # 6). Plaintiffs did not oppose the Motion to Transfer.

3. On March 23, 2015, the Court granted Defendant’s Motion to Transfer and on March 24, 2014, the case was transferred to the District of Connecticut.

4. On March 30, 2015, the Court granted WWE an extension until May 7, 2015 to respond to Plaintiffs’ Complaint.

5. On April 16, 2015, the Court ordered the parties to file the Rule 26(f) meeting report by May 8, 2015.

6. Plaintiffs' counsel has advised that Plaintiffs intend to file an Amended Complaint on or before May 22, 2015.

7. The filing of Plaintiffs' Amended Complaint will moot the existing Complaint, against which Defendant was preparing to move to dismiss.

8. In light of Plaintiffs' intention to file an Amended Complaint and Defendants' intention to move to dismiss that Amended Complaint, the parties' now jointly request that the Court vacate the above deadlines and that the schedule in this case be modified as follows: (a) Plaintiffs shall file an Amended Complaint on or before May 22, 2015; and (b) Defendant shall file its Motion to Dismiss Plaintiffs' Amended Complaint on or before June 22, 2015.

9. In addition, the parties request that their Rule 26(f) obligations be stayed until 30 days after the Court's disposition of Defendants' Motion to Dismiss Plaintiffs' Amended Complaint. This would allow sufficient time for Defendant to respond to any portion of the Amended Complaint that survived, so that the issues may be joined and the scope of discovery adequately defined.

WHEREFORE, the Court should grant this joint motion to modify the existing case scheduling deadlines in this matter, and enter a new schedule as follows:

Plaintiffs shall file an amended complaint by May 22, 2015;

Defendant shall file its motion to dismiss the amended complaint by June 22, 2015; and

The Parties shall file a 26(f) report within 30 days of the Court's ruling on Defendant's motion to dismiss.

**PLAINTIFFS EVAN SINGLETON and
VITO LOGRASSO,**

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Its Attorneys

CERTIFICATION

I hereby certify that on this date a copy of foregoing was filed electronically and served by mail 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/ Jeffrey P. Mueller
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