

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

RUSS McCULLOUGH, a/k/a "Big Russ McCullough," RYAN SAKODA, and MATTHEW R. WIESE, a/k/a "Luther Reigns," individually and on behalf of all others similarly situated,

Plaintiffs,

vs.

WORLD WRESTLING
ENTERTAINMENT, INC.,

Defendant.

LEAD CONSOLIDATED CASE NO.
3:15-cv-01074-VLB

MARCH 9, 2016

**CONSENT MOTION FOR EXTENSION OF TIME TO OBJECT AND/OR RESPOND
TO PLAINTIFFS' FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS**

Pursuant to Rule 7(b)(1)(b) of the Local Rules of Civil Procedure of the United States District Court for the District of Connecticut, Defendant World Wrestling Entertainment, Inc. ("WWE") hereby moves, on consent, for an initial extension of time of thirty (30) days, up to and including April 15, 2016, to object and/or respond to the First Requests for Production of Documents served by Plaintiffs Evan Singleton and Vito Lograsso ("Plaintiffs") on February 12, 2016. In support of this motion, WWE states as follows:

1. On February 12, 2016, Plaintiffs served their First Requests for Production of Documents on WWE by email.
2. WWE's objections and/or responses to Plaintiffs' First Requests for Production of Documents are currently due on March 16, 2016. See Fed. R. Civ. P. 6(d).

3. Rule 7(b) of the Local Rules of Civil Procedure provides in relevant part: “Unless otherwise directed by a particular Judge with respect to cases on his or her docket, the Clerk is empowered to grant initial motions for extensions of time, not to exceed thirty days, in civil cases with regard to . . . the date for serving responses to discovery requests.” D. Conn. L. Civ. R. 7(b)(1)(b).

4. The requested extension of time is necessary to allow sufficient time for WWE to formulate and prepare appropriate objections and/or responses to the over forty requests for production served by Plaintiffs.

5. This is the first motion for an extension of time filed by WWE with respect to the date for serving objections and/or responses to Plaintiffs’ discovery requests.

6. Plaintiffs’ counsel, William Bloss, has informed the undersigned that Plaintiffs consent to the requested extension of time.

WHEREFORE, the Court should grant WWE’s consent motion for an extension of time, up to and including April 15, 2016, to serve objections and/or responses to Plaintiffs’ First Requests for Production of Documents.

**DEFENDANT WORLD WRESTLING
ENTERTAINMENT, INC.,**

By: /s/ Jeffrey P. Mueller

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CERTIFICATION OF SERVICE

I hereby certify that on March 9, 2016 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
Jeffrey P. Mueller (ct27870)