

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

RUSS MCCULLOUGH, RYAN
SAKODA, and MATTHEW ROBERT
WIESE,
individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

WORLD WRESTLING
ENTERTAINMENT, INC.,

Defendant.

Case No. 3:15-cv-01074-VLB

**PLAINTIFFS' MOTION FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANT'S REQUESTS TO ADMIT (ON CONSENT)**

Plaintiffs hereby move for an extension of time of thirty days, from March 14, 2016, to April 13, 2016, to respond to defendant's first set of requests to admit served in the *Singleton v. WWE* case, No. 3:15CV425 VLB. This is the first request for an extension related to time limit.

Counsel for defendant advises that he has no objection to this request.

The reasons for this request are as follows:

1. The number of requests to admit total 222 in number as to plaintiff Singleton and 236 as to plaintiff LoGrasso. This total, 458, is an unusual number of requests and will take longer to respond fairly than the allotted thirty days under Fed. R. Civ. P. 36(a)(3).

2. This request was served shortly after service of extensive interrogatories and document requests. Responses to those requests have been served with only a brief extension requested.
3. This extension, if granted, is not likely to unduly delay any other proceedings in this case.
4. There is no known unfair prejudice to any party if this motion is granted.

PLAINTIFFS,

By: /s/ William M. Bloss
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