

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

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RUSS McCULLOUGH, <i>et al.</i> ,	:	No. 3:15-cv-01074 (VLB)
	:	Lead Case
Plaintiffs,	:	
	:	
VS.	:	
	:	
WORLD WRESTLING ENTERTAINMENT, INC.,	:	
	:	
Defendant.	:	APRIL 4, 2016

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EVAN SINGLETON and VITO LOGRASSO,	:	No. 3:15-cv-00425 (VLB)
	:	Consolidated Case
Plaintiffs,	:	
	:	
VS.	:	
	:	
WORLD WRESTLING ENTERTAINMENT, INC.,	:	
	:	
Defendant.	:	APRIL 4, 2016

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**MOTION FOR RECONSIDERATION OF MARCH 21, 2016 ORDER WITH RESPECT  
TO SINGLETON and LOGRASSO V. WORLD WRESTLING ENTERTAINMENT, INC.**

Pursuant to Local Rule of Civil Procedure 7(c), Defendant World Wrestling Entertainment, Inc. (“WWE”) respectfully moves for reconsideration of the Court’s Memorandum of Decision (Doc. No. 116) with respect to *Singleton and LoGrasso v. World Wrestling Entertainment, Inc.*, No. 3:15-cv-00425 (VLB).

As set forth in the accompanying Memorandum of Law in support of this motion, WWE respectfully submits that the Court should reconsider two distinct

ORAL ARGUMENT REQUESTED  
TESTIMONY NOT REQUIRED

determinations in its Memorandum of Decision and dismiss the sole remaining claim in the Second Amended Complaint of Plaintiffs Singleton and LoGrasso.

First, the Court should reconsider its determination that Singleton and LoGrasso have plausibly alleged facts that, if true, state a claim for fraud by omission under Connecticut law because: (i) Singleton could not plausibly have been harmed by WWE's alleged fraud by omission; (ii) Plaintiffs' fraud by omission claims are not plausible for the same reasons that the Court dismissed their fraud claims; and (iii) there is a complete absence of plausible allegations of any fraudulent intent on the part of WWE.

Second, the Court should reconsider its determination that LoGrasso has plausibly alleged facts that, if true, would support application of an exception to the Connecticut statute of repose. The Second Amended Complaint does not include factual allegations that plausibly invoke either the continuing course of conduct or the fraudulent concealment tolling exceptions to the statute of repose.

WHEREFORE, WWE respectfully requests that the Court grant its motion for reconsideration and dismiss the Second Amended Complaint of Plaintiffs Singleton and LoGrasso in its entirety.

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

By: /s/ Jerry S. McDevitt

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**CERTIFICATION OF SERVICE**

I hereby certify that, on April 4, 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)