

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,	:	CIVIL ACTION NO. 3:15-CV-01074-VLB
	:	LEAD CASE
	:	
	:	
Plaintiffs,	:	
	:	
VS.	:	
	:	
WORLD WRESTLING ENTERTAINMENT, INC.,	:	
	:	
Defendant.	:	APRIL 5, 2016

WORLD WRESTLING ENTERTAINMENT, INC.,	:	CIVIL ACTION NO. 3:15-CV-00994-VLB
	:	CONSOLIDATED CASE
	:	
Plaintiff,	:	
	:	
VS.	:	
	:	
ROBERT WINDHAM, THOMAS BILLINGTON, JAMES WARE, OREAL PERRAS, and VARIOUS JOHN DOE’S,	:	
	:	
Defendants.	:	APRIL 5, 2016

**MOTION FOR RECONSIDERATION OF THE COURT’S
ORDER DISMISSING THE *WINDHAM ACTION***

Pursuant to Local Rule of Civil Procedure 7(c), Plaintiff World Wrestling Entertainment, Inc. (“WWE”) respectfully moves for reconsideration of the Court’s order (Doc. No. 117) with respect to *World Wrestling Entertainment, Inc. v. Windham et al.*, No. 3:15-CV-00994-VLB (“*Windham Action*”).

**ORAL ARGUMENT REQUESTED
TESTIMONY NOT REQUIRED**

As set forth in the accompanying Memorandum of Law in support of this motion, WWE respectfully submits that the Court should reconsider its order because: (i) the Court erred in granting the Defendants' motion to dismiss the *Windham* Action for lack of subject matter jurisdiction; (ii) the Court erred in granting the Defendants' motion to dismiss the *Windham* Action based on its ruling in the *Singleton* Action; and (iii) the Court erred in denying WWE's motion for expedited discovery in the *Windham* Action as moot.

WHEREFORE, the Court should grant WWE's motion for reconsideration, deny the Defendants' motion to dismiss the *Windham* Action, and grant WWE's motion for expedited discovery in that action.

WORLD WRESTLING ENTERTAINMENT, INC.,

By: /s/ Jerry S. McDevitt
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CERTIFICATION OF SERVICE

I hereby certify that, on April 5, 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)