

**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.**

**CIVIL ACTION NO.  
3:15-cv-001074 (VLB)  
Lead Case**

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**EVAN SINGLETON and VITO  
LOGRASSO,**

**Plaintiffs,**

**v.**

**WORLD WRESTLING  
ENTERTAINMENT, INC.,**

**Defendant.**

**CIVIL ACTION NO.  
3:15-CV-00425 (VLB)  
Consolidated Case**

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**WORLD WRESTLING  
ENTERTAINGMENT, INC.,**

**Plaintiff,**

**v.**

**ROBERT WINDHAM, et al.,**

**Defendants.**

**CIVIL ACTION NO.  
3:15-CV-00994 (VLB)  
Consolidated Case**

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**PLAINTIFFS EVAN SINGLETON AND VITO LOGRASSO AND DEFENDANTS  
ROBERT WINDHAM, THOMAS BILLINGTON, JAMES WARE, and OREAL  
PERRAS'S FIRST JOINT MOTION FOR EXTENSION OF TIME TO  
RESPOND TO WORLD WRESTLING ENTERTAINMENT, INC.'S  
MOTIONS FOR RECONSIDERATION**

Plaintiffs Evan Singleton and Vito LoGrasso (“*Singleton* Plaintiffs”) and Defendants Robert Windham, Thomas Billington, James Ware, and Oreal Perras (“*Windham* Plaintiffs”) hereby move for 14-day extensions of time to respond to the Motions for Reconsideration filed by Defendant World Wrestling Entertainment, Inc. (“WWE”) in the above-captioned matter.

1. On April 4, 2016, WWE filed a motion for reconsideration of this Court’s order on WWE’s Motion to Dismiss the Second Amended Complaint brought by the *Singleton* Plaintiffs (Dkt. 118). The *Singleton* Plaintiffs’ opposition is presently due on April 25, 2016, and they now seek an extension of 14 days to May 9, 2016.

2. On April 5, 2016, WWE filed a motion for reconsideration of this Court’s order on the *Windham* Defendants’ motion to dismiss the *Windham* complaint and denying WWE’s motion for expedited discovery in the *Windham* matter as moot (Dkt. 119). WWE filed an amended memorandum in support the following day (Dkt. 120). The *Windham* Defendants’ opposition is presently due on April 26, 2016, and they now seek an extension of 14 days to May 10, 2016.

3. Counsel for the *Singleton* Plaintiffs and *Windham* Defendants are working diligently on responses to the motions. However, in light of the arguments raised and the need to brief the issues thoroughly, and in light of other necessary work in these cases also subject to deadlines, this brief

extension is reasonably necessary. For example, WWE has noticed depositions of medical professionals in Tampa, Florida on April 26, 2016 and April 29, 2016. Plaintiffs have not sought to reschedule these depositions.

4. In addition, undersigned counsel is working to complete discovery in another unrelated case by April 29, 2016, and depositions are currently scheduled for April 26, 27, 28, and 29, 2016 in that case. Finally, co-counsel in this matter had a family medical emergency on April 17 and 18, 2016 that unexpectedly diverted her attention from this matter.

5. This short extension of time, if granted, is not likely to cause undue delay in these or any other consolidated matters in this case.

6. This is the first request for an extension of time related to these motions. There is no known unfair prejudice to any party if this motion is granted.

7. Counsel for WWE advises that he objects to this request.

For all these reasons, the *Singleton* Plaintiffs and *Windham* Defendants respectfully request that this Court grant their motion and extend the deadline for opposing the *Singleton* motion for reconsideration to May 9, 2016 and the deadline for opposing the *Windham* motion for reconsideration to May 10, 2016.

DATE: April 19, 2016

Respectfully Submitted,

s/ Michael J. Flannery

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***Attorneys for Plaintiffs***

## CERTIFICATE OF SERVICE

I hereby certify that on this 19<sup>th</sup> day of April, 2016, a copy of foregoing Motion for Extension of Time 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/ Michael J. Flannery*  
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Michael J. Flannery