

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 20, 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 20, 2016

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**DEFENDANT’S MOTION TO COMPEL RESPONSES TO  
INTERROGATORIES AND REQUESTS FOR PRODUCTION  
DIRECTED TO PLAINTIFFS EVAN SINGLETON AND VITO LOGRASSO**

Pursuant to Federal Rules of Civil Procedure 33, 34, and 37 and Local Rule of Civil Procedure 37, Defendant World Wrestling Entertainment, Inc. (“WWE”) hereby moves to compel responses to certain interrogatories and requests for production directed to Plaintiffs Evan Singleton and Vito LoGrasso (“Plaintiffs”).<sup>1</sup>

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<sup>1</sup> Pursuant to Local Rule 37(a), an affidavit is attached to this motion certifying that counsel for WWE have conferred with counsel for Plaintiffs in a good faith

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 grant its motion to compel because: (i) Plaintiffs have provided incomplete and evasive responses to the interrogatories served by WWE; (ii) Plaintiffs have withheld documents responsive to WWE's requests for production on the basis of frivolous objections; and (iii) Plaintiffs have failed to provide a privilege log.

WHEREFORE, WWE respectfully requests that the Court order Plaintiffs to: (1) provide complete and accurate responses to First Set of Interrogatories 1, 3, 6, 8, and 10-16 directed to LoGrasso, First Set of Interrogatories 8, 9, and 11-17 to Singleton, and Second Set of Interrogatories 1 directed to Plaintiffs; (2) provide complete and accurate responses to Requests for Production 82, 86, 87, 89, 92, 94, 96, 99, 100, and 102 directed to LoGrasso and Requests for Production 36, 37, 81, 83, 92, and 94 directed to Singleton; (3) produce all responsive documents withheld on grounds of attorney-client privilege or the work product doctrine because Plaintiffs have waived the privilege as a result of their failure to provide a privilege log; and (4) pay the attorney's fees and costs incurred by WWE in connection with this motion as required by Federal Rule of Civil Procedure 37.

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effort to resolve by agreement the issues raised by this motion without the intervention of the Court and have been unable to reach such an agreement. Further, in compliance with this Court's chambers practices, WWE sought and received permission from the Court to file the instant motion.

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

By: /s/ Jerry S. McDevitt

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**CERTIFICATION OF SERVICE**

I hereby certify that, on April 20, 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)