

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,	:	CIVIL ACTION NO.
	:	3:15-cv-001074 (VLB)
v.	:	Lead Case
	:	
WORLD WRESTLING	:	
ENTERTAINMENT, INC.,	:	
	:	
Defendant.	:	

PLAINTIFFS EVAN SINGLETON AND VITO LOGRASSO'S
MOTION FOR EXTENSION OF DISCOVERY PERIOD

EXHIBIT 2

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

EVAN SINGLETON and VITO
LOGRASSO,

Plaintiffs,

v.

WORLD WRESTLING
ENTERTAINMENT, INC.,

Defendant

Lead Case No. 3:15-cv-1074-VLB

**NOTICE OF RULE 30(b)(6) DEPOSITION OF
WORLD WRESTLING ENTERTAINMENT, INC.**

PLEASE TAKE NOTICE, that pursuant to Federal Rule of Civil Procedure 30(b)(6), Plaintiffs will take the oral deposition of Defendant WORLD WRESTLING ENTERTAINMENT, INC. ("WWE") on May 31, 2016 beginning at 9:00 a.m. at the offices of KOSKOFF, KOSKOFF & BIEDER, 350 Fairfield Avenue, Bridgeport, Connecticut before a certified court reporter or other competent authority authorized to administer oaths. The deposition will be recorded by audio, audiovisual, videographic, and/or stenographic means.

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, WWE shall (a) designate and produce one or more officers, directors, managing agents, or other sufficiently knowledgeable representatives, as may be required, who consent to testify on behalf of WWE concerning the topics identified below and (b) set forth, for each person so designated, the matters upon which they will testify. The person(s) so designated and produced are required to testify as to matters known or reasonably available to WWE.

1. WWE's policies and procedures regarding the health, safety, and welfare of WWE wrestlers.

2. WWE's prior and current knowledge of the risks of head, brain, and/or neurological injury to the WWE wrestlers, including, but not limited to, concussions, Chronic Traumatic Encephalopathy, and/or sub-concussive blows to the head.

3. WWE's records of any WWE wrestler that has or is suspected to have suffered head, brain, and/or neurological injury, including concussions, Chronic Traumatic Encephalopathy, and sub-concussive blows to the head.

4. WWE's training of its employees and contractors on the treatment and prevention of head, brain, and/or neurological injury to the WWE wrestlers, including concussions, Chronic Traumatic Encephalopathy, and sub-concussive blows to the head.

5. WWE's screening of its wrestlers for head, brain, and/or neurological injury.

6. Any worker compensation claims received by WWE relating to former WWE wrestlers resulting from concussions, Chronic Traumatic Encephalopathy, or sub-concussive blows to the head.

7. WWE's concussion-management and return-to-wrestle policies, including all versions and/or updated policies.

8. WWE's public statements and press releases on the risk of head, brain, and/or neurological injury to the WWE wrestlers, including

concussions, Chronic Traumatic Encephalopathy, or injuries caused by sub-concussive blows to the head.

9. Any marketing, advertising, and/or public statements concerning the existence and/or risk of head, brain, and/or neurological injury to the WWE wrestlers, including concussions, Chronic Traumatic Encephalopathy, or injuries caused by sub-concussive blows to the head.

10. The identity of all persons who drafted (in whole or in part), edited, or otherwise provided information concerning or related to each and every draft (final or otherwise) or written policy which was denominated or became the "Wellness Policy" as testified about during Congressional Hearings.

The deposition will continue from day to day until completed, and may be recorded by stenographic means.

Dated: April 29, 2016

Respectfully Submitted,

s/ Konstantine Kyros

Konstantine W. Kyros

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CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of April, 2016, a copy of foregoing NOTICE OF RULE 30(b)(6) DEPOSITION OF WORLD WRESTLING ENTERTAINMENT, INC. was served in accordance with Federal Rule of Civil Procedure Rule 5, via electronic mail to the following counsel of record:

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I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct.

s/ Konstantine Kyros
Konstantine W. Kyros