

# **Exhibit 3**

**From:** Katie Van Dyck <kvandyck@cuneolaw.com>  
**Sent:** Tuesday, March 29, 2016 10:09 AM  
**To:** Mueller, Jeff  
**Cc:** Michael Flannery; Konstantine Kyros; Bill Bloss; Charles LaDuca; Andrew Sciolla; Harris L. Pogust; Robert K. Shelquist; McDevitt, Jerry; Krasik, Curtis B.  
**Subject:** RE: WWE - Supplemental Responses

Jeff,

My e-mail below actually states that you will receive our supplements within 30 days of the original due date, which is tomorrow.

Katie

Cuneo Gilbert & LaDuca, LLP  
507 C Street NE  
Washington, D.C. 20002  
Direct: (202) 742-5708  
Main: (202) 789-3960  
Fax: (202) 789-1813  
<http://www.cuneolaw.com>

-----Original Message-----

**From:** Mueller, Jeff [mailto:jmueller@daypitney.com]  
**Sent:** Tuesday, March 29, 2016 10:07 AM  
**To:** Katie Van Dyck  
**Cc:** Michael Flannery; Konstantine Kyros; Bill Bloss; Charles LaDuca; Andrew Sciolla; Harris L. Pogust; Robert K. Shelquist; Jerry McDevitt; Curtis B. Krasik  
**Subject:** RE: WWE - Supplemental Responses

Katie:

Will the Plaintiffs be providing their long overdue supplemental discovery responses today as you promised below?

Jeff

-----Original Message-----

**From:** Katie Van Dyck [mailto:kvandyck@cuneolaw.com]  
**Sent:** Friday, March 25, 2016 7:00 PM  
**To:** Mueller, Jeff  
**Cc:** Michael Flannery; Konstantine Kyros; Bill Bloss; Charles LaDuca; Andrew Sciolla; Harris L. Pogust; Robert K. Shelquist; Jerry McDevitt; Curtis B. Krasik  
**Subject:** Re: WWE - Supplemental Responses

Jeff,

I told you on Tuesday that we would provide the supplemental responses early next week. That remains true. I think it is worth mentioning that we provided initial objections only one week after they were initially due while agreeing to a 30-

day extension for your initial objections and responses. We are delaying supplements to ensure that they are complete and in line with Judge Bryant's rulings, and you will receive those supplements within 30 days of the original due date.

Regards,

Katie

Sent from my iPhone

> On Mar 25, 2016, at 6:50 PM, Mueller, Jeff <jmueller@daypitney.com> wrote:

>

> Katie:

>

> We still have not received supplemental discovery responses from the Plaintiffs. If we do not receive them by Monday or Tuesday, then we intend to call chambers on Wednesday to advise the Court that the Plaintiffs have not provided supplemental discovery responses as promised and to request a discovery conference.

>

> Jeff

>

> -----Original Message-----

> From: Mueller, Jeff

> Sent: Wednesday, March 23, 2016 10:04 AM

> To: 'Katie Van Dyck'

> Cc: Michael Flannery; Konstantine Kyros; Bill Bloss; Charles LaDuca;

> Andrew Sciolla; Harris L. Pogust; Robert K. Shelquist; Jerry McDevitt;

> Curtis B. Krasik

> Subject: RE: WWE - Supplemental Responses

>

> Katie:

>

> Plaintiffs' failure to abide by their own commitment to provide supplemental responses yesterday is not acceptable. We first advised you of the obvious deficiencies in Plaintiffs' responses nearly two weeks ago. Plaintiffs do not need another week to provide supplemental responses based on the Court's decision dismissing most of Plaintiffs' claims. We expect Plaintiffs to provide full and complete supplemental responses and to produce all responsive documents (including all social media) by this Friday at the latest. We note that the document production made by Plaintiffs on Monday was wholly inadequate. Among other things, Plaintiffs did not produce a single document from or about either Singleton or Lograsso.

>

> Jeff

>

> -----Original Message-----

> From: Katie Van Dyck [mailto:kvandyck@cuneolaw.com]

> Sent: Tuesday, March 22, 2016 7:49 PM

> To: Mueller, Jeff; Jerry McDevitt; Curtis B. Krasik

> Cc: Michael Flannery; Konstantine Kyros; Bill Bloss; Charles LaDuca;

> Andrew Sciolla; Harris L. Pogust; Robert K. Shelquist

> Subject: Re: WWE - Supplemental Responses

>

> Jeff,

>

> We have been diligently working to provide you with supplemental discovery responses. However, yesterday's opinion from Judge Bryant means that we will require some extra time to consider the order and revise those responses

accordingly. I suggest that we postpone tomorrow's call. We will get supplemental responses to you early next week that are line with the claims remaining in the case. The extra time will certainly lead to a more productive discovery conference both for the parties and the Court. Thank you for the consideration.

>

> Katie

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>

> Sent from my iPhone

>

>> On Mar 21, 2016, at 5:43 PM, Katie Van Dyck <kvandyck@cuneolaw.com> wrote:

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>> Jeff,

>>

>> As we discussed, I am attaching documents which are being produced as a joint response to the requests for production previously served by WWE on Mr. Singleton and Mr. LoGrasso on January 27, 2016. We will providing WWE with written supplemental responses to those as well as the First and Second Sets of Interrogatories tomorrow.

>>

>> Regards,

>>

>> Katherine Van Dyck

>> Cuneo Gilbert & LaDuca, LLP

>> 507 C Street NE

>> Washington, D.C. 20002

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>>

>> From: Katie Van Dyck

>> Sent: Wednesday, March 16, 2016 7:39 PM

>> To: Mueller, Jeff

>> Cc: Michael Flannery; jerry.mcdevitt@klgates.com;

>> curtis.krasik@klgates.com

>> Subject: Re: WWE - Supplemental Responses

>>

>> Jeff,

>>

>> 1. I can confirm that we will produce documents on Monday.

>>

>> 2. I am happy to make myself available at 4:00 on Wednesday. I only ask that you include me on any correspondence with the Court.

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>> Best regards,

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>> Katie

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>>

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>> Sent from my iPhone

>>

>> On Mar 16, 2016, at 6:18 PM, Mueller, Jeff <jmueller@daypitney.com<mailto:jmueller@daypitney.com>> wrote:

>> Katie:

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>> First, please confirm that Plaintiffs will also be producing responsive documents on Monday, March 21, in accordance with your agreement on the call.

>>

>> Second, your email below reflects a continued disregard and lack of awareness of Judge Bryant's orders and procedures. We cannot schedule a discovery conference with Judge Bryant until we receive your supplemental written responses and have an opportunity to review to them. We must then make a good faith effort to agree on the issues to be raised with Judge Bryant and jointly call Chambers to request a conference concerning those issues. Since you have now stated that you will not provide us with supplemental responses until Tuesday, March 22, we cannot be in a position to jointly call Judge Bryant's chambers to schedule the conference until Wednesday afternoon. Please advise us of your availability for that call on Wednesday at 4:00 p.m.

>>

>> Jeffrey P. (Jeff) Mueller | Attorney at Law | Attorney

>> Bio<<http://www.daypitney.com/professionals/M/Mueller-Jeffrey-Paul>>

>>

>> <image001.jpg><<http://www.daypitney.com/>>

>>

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>> [jmueller@daypitney.com](mailto:jmueller@daypitney.com)<<mailto:jmueller@daypitney.com>> | [www.daypitney.com](http://www.daypitney.com)<<http://www.daypitney.com>>

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<image003.png><<http://www.twitter.com/daypitneyllp>> <image004.jpg><<https://www.linkedin.com/company/day-pitney-llp>>

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>> From: Katie Van Dyck [<mailto:kvandyck@cuneolaw.com>]

>> Sent: Wednesday, March 16, 2016 3:03 PM

>> To: Mueller, Jeff; 'jerry.mcdevitt@klgates.com<<mailto:jerry.mcdevitt@klgates.com>>';

'curtis.krasik@klgates.com<<mailto:curtis.krasik@klgates.com>>'

>> Cc: Michael Flannery

>> Subject: WWE - Supplemental Responses

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>> Counsel,

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>> Following up on our conversation yesterday, we will serve supplemental written responses to WWE's discovery requests by Tuesday, March 22.

>>

>> Has any progress been made with scheduling a discovery conference before Judge Bryant?

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>> Katherine Van Dyck

>> Cuneo Gilbert & LaDuca, LLP

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>> Washington, D.C. 20002

>> Direct: (202) 742-5708

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>> <2016.03.21 Singleton & LoGrasso Production.pdf>

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