

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
:**

**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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**PLAINTIFFS EVAN SINGLETON AND VITO LOGRASSO'S
FIRST EMERGENCY MOTION TO COMPEL COMPLIANCE WITH ORDER
DENYING DEFENDANT WORLD WRESTLING ENTERTAINMENT, INC.'S
EMERGENCY MOTION FOR PROTECTIVE ORDER**

Pursuant to Rule 37 of the Federal Rules of Civil Procedure, Plaintiffs Evan Singleton and Vito LoGrasso respectfully request that this Court enter an order compelling Defendant World Wrestling Entertainment, Inc. ("WWE") to comply with its May 13, 2016 Order Denying Motion for Protective Order entered on May

13, 2016 (Dkt. 134) and sanctioning it for “fail[ing] to obey an order to provide or permit discovery.” Fed. R. Civ. P. 37(b)(2)(A).

Shortly after the entry of this Court’s order, WWE informed counsel that it would not produce two of the witnesses – specifically Stephanie McMahon and Paul Levesque – for the Rule 30(b)(1) depositions previously noticed by Plaintiffs and that it would not produce Dr. Joseph Maroon for more than four hours of the Rule 30(b)(1) deposition previously noticed by Plaintiffs. All of these depositions were the subject of the motion for protective order brought by WWE and denied by this Court, and the reasons WWE gives for its refusal to comply with this Court’s order are the very arguments this Court rejected. These witnesses are WWE’s officers and managing agents, WWE has indicated through counsel that it controls them, and WWE is responsible for producing them for their depositions. For all these reasons, Plaintiffs submit that an order compelling WWE to produce these witness for up to seven hours of depositions pursuant to Rule 30(b)(1) is required and that sanctions under both Rule 37 of the Federal Rules of Civil Procedure and Local Rule of Civil Procedure 37 are appropriate and necessary

**ORAL ARGUMENT REQUESTED
TESTIMONY NOT REQUIRED**

Dated: May 16, 2016

Respectfully Submitted,

s/ Michael J. Flannery
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CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of May, 2016, a copy of the foregoing Plaintiffs' First Motion for Compel was served via this Court's electronic case filing system.

s/Michael J. Flannery
Michael J. Flannery