

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.
v.	:	3:15-cv-001074 (VLB)
	:	Lead Case
WORLD WRESTLING ENTERTAINMENT, INC.,	:	
	:	
Defendant.	:	

EVAN SINGLETON and VITO LOGRASSO,	:	
	:	
Plaintiffs,	:	CIVIL ACTION NO.
v.	:	3:15-CV-00425 (VLB)
	:	Consolidated Case
WORLD WRESTLING ENTERTAINMENT, INC.,	:	
	:	
Defendant.	:	

DECLARATION OF KATHERINE VAN DYCK

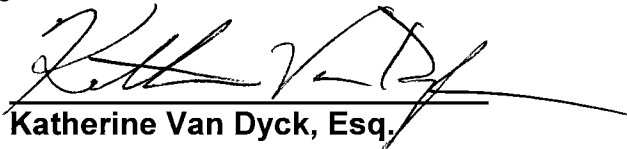
Pursuant to 28 U.S.C. § 1746, I, Katherine Van Dyck, declare as follows under penalty of perjury:

1. I am an attorney with the law firm of Cuneo, Gilbert & LaDuca, LLP, counsel for Plaintiffs Evan Singleton and Vito LoGrasso. I make this declaration on personal knowledge and review of my files. I submit this declaration in support of 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.

2. I am submitting this affidavit in accordance with Local Rule of Civil Procedure 37 to certify that counsel for Plaintiffs have conferred with counsel for WWE in a good faith effort to resolve the issues raised by Plaintiffs' Motion without the intervention of the Court. Counsel for WWE have made it clear that WWE will not produce witnesses Stephanie McMahon, Paul Levesque, and Dr. Joseph Maroon for depositions properly noticed by Plaintiffs, despite this Court's order denying WWE's request for an order quashing those notices. See Ex. A, E-mails Between Counsel. As a result, the parties have been unable to reach agreement as to the scheduling and taking of those depositions.

Executed this 16th day May, 2016


Katherine Van Dyck, Esq.