

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.	:	

**MOTION TO SEAL PLAINTIFFS’ SECOND EMERGENCY
MOTION TO COMPEL AND EXHIBITS**

Plaintiffs Evan Singleton and Vito LoGrasso (“Plaintiffs”) bring this motion pursuant to Local Civil Rule 5(e)(4) to file under seal Plaintiffs’ Second Emergency Motion to Compel and Exhibits. In support thereof, Plaintiffs state as follows:

1. Exhibits C and D to Plaintiffs' Second Emergency Motion to Compel were marked "CONFIDENTIAL" pursuant to this Court's Standing Protective Order by Defendant World Wrestling Entertainment, Inc. ("WWE")

2. Local Civil Rule 5(e) permits the filing of documents under seal upon a finding that the "sealing is supported by clear and compelling reasons and is narrowly tailored to serve those reasons." L.R. 5(e)(3). "[C]ourt documents may be sealed if 'specific, on the record findings are made demonstrating that 'closure is essential to preserve higher values and is narrowly tailored to serve that interest.'" *Travelers Indem. Co. v. Excalibur Reinsurance Corp.*, No. 11-cv-1209, 2013 WL 4012772, at *3 (D. Conn. Aug. 5, 2013) (quoting *Press-Enterprise Co. v. Superior Court*, 478 U.S. 1, 13-14 (1986)). "Improperly designating documents as confidential places an enormous burden on both the parties and, through the overuse of sealed filings, on the Court," and Plaintiffs do not necessarily believe that WWE's designations are consistent with these requirements. *Humphreys v. Regents of the Univ. of Cal.*, No. C-04-03808 SI, 2006 WL 3020902, at *2 (N.D. Cal. Oct. 23, 2006).

3. Plaintiffs therefore seek to file the Second Emergency Motion to Compel and Exhibits under seal in order to comply with the Standing Protective Order entered in this action. Plaintiffs see no reason that this motion should be granted and believe an unredacted version of the Second Emergency Motion to Compel and Exhibits should be filed in the public record.

Dated: May 17, 2016

Respectfully Submitted,

s/ Michael J. Flannery

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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of May, 2016, a copy of the foregoing Motion to Seal was served via this Court's electronic case filing system.

s/Michael J. Flannery

Michael J. Flannery