

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

**SECOND EMERGENCY MOTION TO COMPEL DEFENDANT
WORLD WRESTLING ENTERTAINMENT, INC.'S RESPONSES TO
PLAINTIFFS EVAN SINGLETON AND VITO LOGRASSO'S CORRECTED
FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS**

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 provide complete responses to Plaintiffs' Corrected First Requests for Production of Documents, which were served on February 12, 2016. WWE's document

production, which Plaintiffs received more than a week after the extended deadline approved by this Court, fall far short of the requirements of Rule 26 and Rule 34, and the objections are based on an overly restrictive reading of this Court's order partially lifting its stay of discovery. Consistent with its prior efforts to avoid discovery in this matter, WWE has withheld documents directly relevant to this litigation, prejudicing Plaintiffs' ability to notice and take meaningful depositions in this matter. Plaintiffs therefore respectfully request this Court grant their motion to compel complete responses.

**ORAL ARGUMENT REQUESTED
TESTIMONY NOT REQUIRED**

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 for Compel was served via this Court's electronic case filing system.

s/Michael J. Flannery

Michael J. Flannery