## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF CONNECTICUT

RUSS McCULLOUGH, et al., : No. 3:15-cv-01074 (VLB)

**Lead Case** 

Plaintiffs, :

·

VS.

WORLD WRESTLING ENTERTAINMENT, INC.,

:

Defendant.: MAY 23, 2016

EVAN SINGLETON and VITO : No. 3:15-cv-00425 (VLB)

LOGRASSO, : Consolidated Case

Plaintiffs, :

:

:

WORLD WRESTLING ENTERTAINMENT, INC.,

VS.

.

**Defendant.** : MAY 23, 2016

MOTION TO SEAL EXHIBIT 1 TO DEFENDANT WORLD WRESTLING
ENTERTAINMENT, INC.'S REPLY IN SUPPORT OF MOTION FOR
RECONSIDERATION OF MARCH 21, 2016 ORDER WITH RESPECT TO
SINGLETON and LOGRASSO V. WORLD WRESTLING ENTERTAINMENT, INC.

Pursuant to Local Civil Rule 5(e), Defendant World Wrestling
Entertainment, Inc. ("WWE") hereby moves to file under seal Exhibit 1 to the
Reply in Support of its Motion for Reconsideration of the March 21, 2016 Order
with respect to Singleton and LoGrasso v. World Wrestling Entertainment, Inc.

Exhibit 1 contains material that has been designated as CONFIDENTIAL pursuant to the Court's Standing Protective Order governing this action. Exhibit

1 contains proprietary business information of WWE that has not been made by public by WWE.

Accordingly, WWE requests permission to file an unredacted version of Exhibit 1 under seal. WWE has served an unredacted version of Exhibit 1 on the Plaintiffs and has filed the same under seal with the Court in accordance with Local Civil Rule 5(e). A redacted version of Exhibit 1 has been filed electronically.

> **DEFENDANT WORLD WRESTLING ENTERTAINMENT, INC.,**

By: /s/ Jerry S. McDevitt\_ Jerry S. McDevitt (pro hac vice) Terry Budd (pro hac vice) Curtis B. Krasik (pro hac vice) **K&L GATES LLP K&L Gates Center** 210 Sixth Avenue Pittsburgh, PA 15222 Phone: (412) 355-6500

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Its Attorneys.

## **CERTIFICATION OF SERVICE**

I hereby certify that on May 23, 2016 a copy of foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

I further certify that on May 23, 2016, a copy of this Motion to Seal and the document referenced herein were served on the following counsel by email.

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