

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. :
 :

EVAN SINGLETON and VITO : No. 3:15-cv-00425 (VLB)
 LOGRASSO, : Consolidated Case
 :
 Plaintiffs, :
 :
 vs. :
 :
 WORLD WRESTLING :
 ENTERTAINMENT, INC., :
 :
 Defendant. :
 :

DEFENDANT WORLD WRESTLING ENTERTAINMENT, INC.'S NOTICE OF COMPLIANCE WITH THE COURT'S MAY 24, 2016 ORDER (DKT. 151)

On May 24, 2016, the Court issued an Order (Dkt. 151) directing Defendant World Wrestling Entertainment, Inc. ("WWE") to respond by May 25, 2016 to Plaintiffs' Emergency Motion to Compel (Dkt. 135) regarding the depositions identified in the Motion.¹ WWE respectfully submits this Notice of compliance

¹ The Court also directed WWE to respond by May 27, 2016 to Plaintiffs' Second Emergency Motion to Compel (Dkt. 142). Dkt. 151. WWE will respond to the Second Emergency Motion to Compel by the May 27th deadline set by the Court.

with the Court's May 24, 2016 Order in that WWE opposed Plaintiffs' Motion on May 17, 2016 (Dkt. 137) and WWE stands on the arguments set forth in the Opposition, as updated below.

First, with respect to the deposition of Dr. Joseph Maroon discussed in Plaintiffs' Motion, Plaintiffs deposed Dr. Maroon on May 20, 2016 from 8:00 a.m. until 12:00 p.m. Dr. Maroon provided full and complete testimony on the relevant issues under the Court's January 15, 2016 discovery order and, therefore, in addition to the arguments set forth in WWE's Opposition, WWE further objects to any continuation of Dr. Maroon's deposition which, given Dr. Maroon's schedule, would have to occur outside of the discovery period.

Second, with respect to the deposition of Paul Levesque, Plaintiffs have postponed his 30(b)(1) deposition to May 31, when they will be able to depose him both as a corporate designee and in his individual capacity.

Third, with respect to the deposition of Stephanie McMahon, the parties' met again and further conferred with Plaintiffs' counsel as directed by the Court, but were unable to reach any agreement. WWE continues to believe that Plaintiffs have not identified any legitimate basis for taking Ms. McMahon's deposition particularly given Plaintiffs' ability to depose Vincent McMahon, WWE's CEO and President, Paul Levesque, WWE's Executive Vice President, Talent, Live Events and Creative, *and* a 30(b)(6) corporate designee.

Finally, WWE notes that, aside from the depositions that are the subject of Plaintiffs' Motion, on the other remaining business days before the discovery cutoff, Plaintiffs have noticed their intention to take the depositions of Vince

McMahon on May 27, WWE's corporate representative pursuant to Rule 30(b)(6) on May 31, and third parties Christopher Nowinski and Dr. Chris Amann on June 1.

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

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Its Attorneys.

CERTIFICATION OF SERVICE

I hereby certify that, on May 25, 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.

/s/ Jeffrey P. Mueller
Jeffrey P. Mueller (ct27870)