

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 27, 2016

EVAN SINGLETON and VITO : No. 3:15-cv-00425 (VLB)
 LOGRASSO, : Consolidated Case
 :
 Plaintiffs, :
 :
 vs. :
 :
 WORLD WRESTLING :
 ENTERTAINMENT, INC., :
 :
 Defendant. : MAY 27, 2016

**MOTION TO SEAL EXHIBITS TO MEMORANDUM OF LAW IN OPPOSITION TO
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 Local Civil Rule 5(e), Defendant World Wrestling
Entertainment, Inc. ("WWE") hereby moves to file under seal Exhibits 5, 6, 9, & 16
to its Memorandum of Law in Opposition to the Second Emergency Motion to
Compel Responses to Plaintiffs Evan Singleton and Vito LoGrasso's Corrected
First Requests for Production of Documents.

Exhibits 5, 6, 9, & 16 contain material that has been designated as CONFIDENTIAL pursuant to the Court's Standing Protective Order governing this action. These exhibits 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 Exhibits 5, 6, 9, & 16 under seal. WWE has served an unredacted versions of these documents on Plaintiffs and has filed them under seal with the Court in accordance with Local Civil Rule 5(e). Redacted versions of these documents have been filed electronically.

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

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CERTIFICATION OF SERVICE

I hereby certify that on May 27, 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 27, 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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