

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

RUSS McCULLOUGH, <i>et al.</i> ,	:	No. 3:15-cv-01074 (VLB)
	:	Lead Case
Plaintiffs,	:	
	:	
vs.	:	
	:	
WORLD WRESTLING ENTERTAINMENT, INC.,	:	
	:	
Defendant.	:	JUNE 3, 2016

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

**MOTION TO SEAL DEFENDANT’S MEMORANDUM OF LAW IN OPPOSITION TO
PLAINTIFF’S MOTION FOR LEAVE TO FILE MOTION TO COMPEL COMPLIANCE
WITH DEPOSITION SUBPOENA AND EXHIBIT A TO MEMORANDUM OF LAW**

Pursuant to Local Civil Rule 5(e), Defendant World Wrestling Entertainment, Inc. (“WWE”) hereby moves to file under seal (1) an unredacted version of Defendant’s Memorandum of Law in Opposition to Plaintiff’s Motion for Leave to File Motion to Compel Compliance with Deposition Subpoena (“Opposition”) and (2) Exhibit A to the Opposition.

The Opposition and Exhibit A contain material that has been designated as CONFIDENTIAL pursuant to the Court’s Standing Protective Order governing this

action including proprietary business information of WWE that has not been made by public by WWE.

Accordingly, WWE requests permission to file unredacted versions of the Opposition and Exhibit A under seal. WWE has served 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.,**

By: /s/ Jerry S. McDevitt

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CERTIFICATION OF SERVICE

I hereby certify that on June 3, 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 June 3, 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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