

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 6, 2016

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EVAN SINGLETON and VITO LOGRASSO,	:	No. 3:15-cv-00425 (VLB)
	:	Consolidated Case
Plaintiffs,	:	
	:	
vs.	:	
	:	
WORLD WRESTLING ENTERTAINMENT, INC.,	:	
	:	
Defendant.	:	JUNE 6, 2016

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**MOTION TO SEAL**

Pursuant to Local Rule of Civil Procedure 5(e), Defendant World Wrestling Entertainment, Inc. (“WWE”) hereby moves to seal Exhibits 6 and 7 to its Reply in Support of its Motion for Reconsideration filed on May 23, 2016 (Doc. Nos. 150-6 and 150-7) and Exhibits 2 and 11-15 to its Memorandum in Opposition to Plaintiffs’ Second Emergency Motion to Compel filed on May 27, 2016 (Doc. Nos. 158-2, 158-11, 158-12, 158-13, 158-14, and 158-15) (collectively, the “Exhibits”). Plaintiffs consent to this motion. In support of the motion, WWE states as follows.

**On June 3, 2016, Plaintiffs requested that certain lines from Vito LoGrasso's deposition testimony be treated as confidential under the Court's Standing Protective Order governing this action. The Exhibits contain some of the lines of Mr. LoGrasso's deposition testimony that Plaintiffs regard as confidential. WWE therefore moves to seal the unredacted versions of the Exhibits containing these lines. WWE has attached redacted versions of the Exhibits reflecting Plaintiffs' designations as exhibits to this motion.**

**WHEREFORE, WWE requests that the Court seal Exhibits 6 and 7 to its Reply in Support of its Motion for Reconsideration filed on May 23, 2016 (Doc. Nos. 150-6 and 150-7) and Exhibits 2 and 11-15 to its Memorandum in Opposition to Plaintiffs' Second Emergency Motion to Compel filed on May 27, 2016 (Doc. Nos. 158-2, 158-11, 158-12, 158-13, 158-14, and 158-15). Redacted versions of these exhibits have been filed electronically as exhibits to this motion.**

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

**By: /s/ Jerry S. McDevitt**

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**Curtis B. Krasik (pro hac vice)**

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**Its Attorneys.**

**CERTIFICATION OF SERVICE**

I hereby certify that on June 6, 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)**