

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT**

RUSS MCCULLOUGH, RYAN SAKODA,	:	
and MATTHEW ROBERT WIESE,	:	
individually and on behalf of all others	:	
similarly situated,	:	
	:	
Plaintiffs,	:	CIVIL ACTION NO.
	:	3:15-cv-001074 (VLB)
v.	:	Lead Case
	:	
WORLD WRESTLING	:	
ENTERTAINMENT, INC.,	:	
	:	
Defendant.	:	

EVAN SINGLETON and VITO	:	
LOGRASSO,	:	
	:	
Plaintiffs,	:	CIVIL ACTION NO.
	:	3:15-CV-00425 (VLB)
v.	:	Consolidated Case
	:	
WORLD WRESTLING	:	
ENTERTAINMENT, INC.,	:	
	:	
Defendant.	:	

**PLAINTIFFS' MOTION FOR RECONSIDERATION OF THE COURT'S ORDER
DENYING PLAINTIFFS' MOTION FOR LEAVE TO FILE MOTION TO COMPEL
COMPLIANCE WITH DEPOSITION SUBPOENA**

Pursuant to Local Rule of Civil Procedure 7(c), Plaintiffs Evan Singleton and Vito LoGrasso ("Plaintiffs") respectfully move for reconsideration of the Court's Order (Doc. No. 171) denying Plaintiffs' Motion for Leave of this Court to Reopen Discovery so that Plaintiffs may file a Motion to Compel Compliance with the Deposition Subpoena of Chris Nowinski in Massachusetts.

As set forth in the accompanying Memorandum of Law in support of this motion, Plaintiffs respectfully submit that the Court should reconsider its order because the Court erred in denying the Plaintiffs' motion and not granting Plaintiffs a brief extension of the discovery period to enforce their timely served subpoena and conduct the deposition of Mr. Chris Nowinski. A similar two-week extension was granted by the Court for the deposition of Stephanie McMahon; nevertheless, Plaintiffs finalized that deposition on the exact same day as the Court's Order granting the extension. As such, it should be clear that Plaintiffs have no desire to prolong discovery or delay this litigation for any longer than absolutely necessary. As discussed in detail in the accompanying Memorandum of Law, Mr. Nowinski possesses critical information related to Plaintiffs' claims, and Defendant's repeated attempts to frustrate and side-step all of Plaintiffs' discovery requests related to Mr. Nowinski have so far prove successful and are the true cause of the delay despite Plaintiffs' diligent efforts to conduct relevant and appropriate discovery.

Accordingly, for good reasons shown, the Court should grant Plaintiffs' motion for reconsideration, briefly reopen discovery, and grant Plaintiffs' motion for leave of court to compel Mr. Nowinski's appearance at his properly noticed and subpoenaed deposition.

/s/ Andrew J. Sciolla

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CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of June, 2016, a copy of the foregoing Motion for Reconsideration was served via this Court's electronic case filing system to all counsel of record.

/s/Andrew J. Sciolla

Andrew J. Sciolla