

and Denying in Part Plaintiffs' Motions to Compel (Dkt. 160). Mr. Nowinski suffered repeated concussions during his tenure as a WWE wrestler; he was actively researching and authoring a book regarding the long-term effects of concussions when he was employed by WWE following his retirement in 2008; and his concussion research organization, Concussion Legacy Foundation, has received significant financial contributions from WWE. See Memorandum of Law in Support of Motion for Reconsideration at 2-7 (Dkt. 174-1).

After Plaintiffs filed their motion, the Boston Globe published an article examining Mr. Nowinski and his foundation's relationship with WWE and the conflict of interest it has created. See Exhibit A, Bob Hohler, *Ex-Wrestlers Say One Of Their Own Sells Them Short*, Boston Globe, June 12, 2016, available at <http://tinyurl.com/jz5h7xyl> (last visited June 14, 2016). Since WWE agreed to donate \$2.7 million to the foundation in 2013, "Nowinski and his foundation staff have reached out to the families of 12 deceased athletes to acquire their brains for researchers to study for links between repetitive head blows and [CTE], . . . [b]ut none of those brains belonged to a professional wrestler, *despite nearly 100 of them dying since the WWE's initial gift to Nowinski's foundation.*" *Id.* at 2 (emphasis added). In addition, a noted neuropathologist and CTE researcher told the Boston Globe that, while she "has examined nearly all the brains Nowinski and his team have obtained *since 2008*, . . . only one them belonged to a professional wrestler." *Id.* at 5 (emphasis added). In short, this article outlines the very same relevant knowledge Mr. Nowinski possesses and which Plaintiffs seek to explore. Plaintiffs therefore respectfully request that this Court

reconsider its Order on Plaintiffs' Motion for Leave to File Motion to Compel Compliance with Deposition Subpoena..

Dated: June 14, 2016

Respectfully Submitted,

s/ Andrew J. Sciolla

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CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of June, 2016, a copy of the foregoing Notice of Supplemental Authority was served via this Court's electronic case filing system.

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