

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. : August 1, 2016

EVAN SINGLETON and VITO : No. 3:15-cv-00425 (VLB)
 LOGRASSO, : Consolidated Case
 :
 Plaintiffs, :
 :
 vs. :
 :
 WORLD WRESTLING :
 ENTERTAINMENT, INC., :
 :
 Defendant. : August 1, 2016

**MOTION TO SEAL DEFENDANT WORLD WRESTLING ENTERTAINMENT, INC.'S
MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT**

Pursuant to Local Civil Rule 5(e), Defendant World Wrestling Entertainment, Inc. ("WWE") hereby moves to file under seal an unredacted version of Defendant's Memorandum of Law in Support of Motion for Summary Judgment.

Defendant's Memorandum of Law in Support of Motion for Summary Judgment contains material that has been designated as CONFIDENTIAL pursuant to the Court's Standing Protective Order governing this action. The

Memorandum of Law in Support of Motion for Summary Judgment contains proprietary business information of WWE that has not been made public by WWE.

Accordingly, WWE requests permission to file an unredacted version of its Memorandum of Law in Support of Motion for Summary Judgment under seal. WWE has served an unredacted version of the document on Plaintiffs and has filed it under seal with the Court in accordance with Local Civil Rule 5(e). A redacted version of the document has been filed electronically.

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

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CERTIFICATION OF SERVICE

I hereby certify that on August 1, 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 August 1, 2016, a copy of this Motion to Seal and the documents referenced herein were served on the following counsel by email.

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