

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 WORLD WRESTLING ENTERTAINMENT, INC.'S
LOCAL RULE 56(a)(1) STATEMENT AND APPENDIX TABS TO LOCAL RULE
56(a)(1) STATEMENT**

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 Local Rule 56(a)(1) Statement (“Statement”), and (2) Appendix Tabs 5, 6, 8-11, 12, 14, 21, 22, 25-31, 47, 49-74, 80-85, & 86-92 to its Local Rule 56(a)(1) Statement.

Defendant’s Statement and Appendix Tabs 5, 6, 8-11, 12, 14, 21, 22, 25-31, 47, 49-74, 80-85, & 86-92 contain material that has been designated as

CONFIDENTIAL pursuant to the Court's Standing Protective Order governing this action. The Statement and exhibits contain proprietary business information of WWE that has not been made public by WWE.

Accordingly, WWE requests permission to file an unredacted version of the Statement and Appendix Tabs 5, 6, 8-11, 12, 14, 21, 22, 25-31, 47, 49-74, 80-85, & 86-92 under seal. WWE has served an unredacted version 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.,**

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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 lead counsel by First Class Mail.

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