

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

RUSS McCULLOUGH, a/k/a “Big Russ McCullough,” RYAN SAKODA, and MATTHEW R. WIESE, a/k/a “Luther Reigns,” individually and on behalf of all others similarly situated,

Plaintiffs,

vs.

WORLD WRESTLING  
ENTERTAINMENT, INC.,

Defendant.

LEAD CONSOLIDATED CASE NO.  
3:15-cv-01074-VLB

AUGUST 28, 2015

**MOTION FOR EXPEDITED DISCOVERY AS TO THE  
IDENTITIES OF JOHN DOE DEFENDANTS IN THE WINDHAM ACTION**

World Wrestling Entertainment, Inc. (“WWE”) respectfully moves this Court for expedited discovery as to the identities of the John Doe Defendants in the declaratory judgment action styled *World Wrestling Entertainment, Inc. v. Windham et al.*, Case Number 3:15-cv-00994-VLB (the “Windham Action”).

As set forth more fully in the accompanying Memorandum of Law in support of this motion, there is good cause for expedited discovery to determine the identities of the John Doe Defendants. First, WWE cannot identify the John Doe Defendants by other means because their counsel have refused to disclose their identities and the claims against them cannot proceed unless and until they are identified and joined in this consolidated action. Second, WWE’s request is sufficiently specific because it seeks only basic identifying information about the John Doe Defendants necessary to enable WWE to amend its complaint in the Windham Action and serve the additional defendants. Contrary to the claims of

their counsel, the information requested concerning the identities of the John Doe Defendants is not protected by the attorney-client privilege.

WHEREFORE, the Court should grant WWE's motion for expedited discovery as to the identities of the John Doe Defendants in the Windham Action.

WORLD WRESTLING ENTERTAINMENT, INC.,

By: /s/ Jerry S. McDevitt

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**CERTIFICATION**

I hereby certify that on this date 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)