EXHIBIT A

From:	McDevitt, Jerry <jerry.mcdevitt@klgates.com></jerry.mcdevitt@klgates.com>
Sent:	Monday, July 27, 2015 4:49 PM
То:	Bill Bloss; Konstantine Kyros; <charles@cuneolaw.com> LaDuca; Robert K. Shelquist;</charles@cuneolaw.com>
	Erica Mirabella
Subject:	Re: WWE matters

I was traveling today, and only now saw your email. I also see that you filed a motion in the windham case without waiting for a response from us to your request.

First of all, the Judge last week issued orders consolidating the cases and ordering that filings be made to the McCullough case caption and number. You have filed your motion to the wrong number.

Second, the court issued orders on scheduling already as we understand it. Based on our understanding of the operative orders, we are to advise the court on Aug 6th if we intend to rely on the pending motion to dismiss in Lograsso. We will be relying on that and as matters now stand will advise the court of that on Aug 6th. By virtue of your prior motion for an extension and the courts order issued before consolidation, we understand that any opposition to that MTD will be due from you on Aug 10th.

The court last week also indicated that any additional responsive pleadings in the consolidated cases were to be filed by Aug 27th. It is our understanding that is the date you must move or answer in the Windham matter and we must move or answer to the McCullogh complaint. That is why I asked this past Saturday whether your side intended to pursue those claims and, if so, whether you intended to amend since that complaint includes claims dropped in prior complaints as well as time barred claims. We would appreciate an answer to our inquiry as we will incur time and expense drafting a MTD to that complaint which are avoidable if you intend to amend or not pursue those claims.

I am advised that service was made today on the last defendant in the Windham case, so I assume whatever date you wish to respond will be for all four of those defendants. Please confirm that to be the case.

If your side has a different view of the operative orders, or needs a different time to respond to Windham beyond Aug 27th, please advise so that we may all seek clarification from the court should that be necessary. Lastly, by this email, I am requesting that Mr. kyros disclose all other former performers who have signed a retainer agreement with him so that we can amend to add them and remove the John Doe designations. This will eliminate further delay in the matter.

Sent from my iPad

On Jul 27, 2015, at 2:07 PM, Bill Bloss < BBloss@KOSKOFF.com > wrote:

Mr. McDevitt: I sent the email below to local counsel; he is apparently out of the office. I intend to ask the Clerk for 30 days to respond to the WWE v. Windham action under our local rule – at least for the three who were reportedly served – and would like to report your position on that request. Bill Bloss

From: Bill Bloss Sent: Monday, July 27, 2015 2:04 PM To: Mueller, Jeffrey P. (jmueller@daypitney.com) Subject: WWE matters

Jeff: I'm filing my appearance today in the WWE v. Windham action, as well as in the McCullough v. WWE matter, in anticipation of others filing appearances in one or the other. I

Case 3:15-cv-01074-VLB Document 60-2 Filed 08/28/15 Page 3 of 4

intend to ask the Clerk for 30 days to respond to the WWE v. Windham complaint under Local Rule 7(b)1...What should I report is your position on that? Thanks. Bill

From: <u>CMECF@ctd.uscourts.gov</u> [mailto:CMECF@ctd.uscourts.gov] Sent: Thursday, July 23, 2015 2:54 PM To: <u>CMECF@ctd.uscourts.gov</u> Subject: Activity in Case Create Case Association

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended. ***NOTE TO PUBLIC ACCESS USERS*** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

United States District Court for the District of Connecticut

Notice of Electronic Filing

The following transaction was entered on 7/23/2015 at 2:53 PM EDT and filed on 7/23/2015

Case Name:Singleton et al v. World Wrestling Entertainment, IncCase Number:3:15-cv-00425-VLBFiler:Document Number: No document attached

Docket Text: Cases associated. Create association to 3:15-cv-01074-VLB. (Grady, B.)

3:15-cv-00425-VLB Notice has been electronically mailed to:

William M. Bloss <u>bbloss@koskoff.com</u>, gparrilla@koskoff.com, lgrossberg@koskoff.com

Thomas D. Goldberg <u>tdgoldberg@daypitney.com</u>, <u>astrada@daypitney.com</u>, <u>managingclerk@daypitney.com</u>

Jonathan B. Tropp jbtropp@daypitney.com, sprice@daypitney.com

Jerry S. McDevitt jerry.mcdevitt@klgates.com, klgateseservice@klgates.com, luanne.wee@klgates.com, rachael.sobolak@klgates.com

Terry Budd <u>terry.budd@klgates.com</u>

Curtis B. Krasik <u>curtis.krasik@klgates.com</u>, <u>klgateseservice@klgates.com</u>

Case 3:15-cv-01074-VLB Document 60-2 Filed 08/28/15 Page 4 of 4

Jeffrey Mueller jpmueller@daypitney.com, kboardway@daypitney.com

- Harris L. Pogust <u>hpogust@pbmattorneys.com</u>
- Charles LaDuca charles@cuneolaw.com
- Konstantine Kyros <u>kon@kyroslaw.com</u>
- Erica Mirabella <u>Erica@mirabellaLLC.com</u>
- Robert K. Shelquist <u>rkshelquist@locklaw.com</u>, <u>bgilles@locklaw.com</u>, <u>kjleroy@locklaw.com</u>

Kevin Michael O'Brien kobrien@pbmattorneys.com

Scott A. Moriarity <u>samoriarity@locklaw.com</u>

3:15-cv-00425-VLB Notice has been delivered by other means to:



Koskoff, Koskoff & Bieder, PC 350 Fairfield Ave. Bridgeport. CT 06604 203.336.4421 www.koskoff.com

THIS MESSAGE IS ONLY FOR THE USE OF THE ADDRESSEE AND MAY CONTAIN CONFIDENTIAL AND PRIVILEGED INFORMATION. Any dissemination, distribution or copying of this communication other than by the intended recipient(s) is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone (collect), and destroy all copies of this communication. Thank you.

This electronic message contains information from the law firm of K&L Gates LLP. The contents may be privileged and confidential and are intended for the use of the intended addressee(s) only. If you are not an intended addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this e-mail in error, please contact me at <u>Jerry.McDevitt@klgates.com</u>