

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

|   |   |                       |
|---|---|-----------------------|
| JOSEPH M. LAURINAITIS, <i>et al.</i> ,                  | : | NO. 3:16-CV-01209-WWE |
|   | : |                       |
| Plaintiffs,   | : |                       |
|   | : |                       |
| VS.   | : |                       |
|   | : |                       |
| WORLD WRESTLING ENTERTAINMENT,<br>INC., <i>et al.</i> , | : |                       |
|   | : |                       |
| Defendants.   | : | AUGUST 16, 2016       |

**CONSENT MOTION FOR EXTENSION OF TIME TO FILE AN ANSWER OR  
MOTION ADDRESSED TO THE COMPLAINT**

Pursuant to Local Rule of Civil Procedure 7(b)(1), Defendants World Wrestling Entertainment, Inc. and Vincent K. McMahon (collectively, “Defendants”) hereby move on consent for an initial extension of time of thirty (30) days, up to and including October 19, 2016, to file an answer or a motion addressed to the Complaint in this action. In support of this motion, Defendants state as follows:

1. The initial deadline for Defendants to respond to the Complaint is September 19, 2016. (*See* Doc. Nos. 19 and 20.)

2. Pursuant to Local Rule of Civil Procedure 7(b)(1), the Clerk is empowered to grant initial motions for extension of time, not to exceed thirty (30) days, with regard to the date for filing an answer or motion addressed to the Complaint.

3. The requested extension of time is necessary to provide Defendants with additional time to formulate and prepare an appropriate response to the Complaint. The Complaint in this action was brought by 53 individual Plaintiffs, spans 214 pages and 667 paragraphs, and purports to assert 17 different counts. Due to the length and prolixity of the Complaint, a thirty day extension of time to respond to it is plainly warranted.

4. The undersigned certifies that no previous motions for extension of time have been filed by Defendants in this action.

5. The undersigned has inquired of Plaintiffs' counsel, and Plaintiffs consent to this motion for extension of time.

WHEREFORE, the Court should grant Defendants' consent motion for an extension of time until October 19, 2016 to file an answer or motion addressed to the Complaint.

DEFENDANTS WORLD WRESTLING  
ENTERTAINMENT, INC. and VINCENT K.  
McMAHON,

By: /s/ Jeffrey P. Mueller

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Their Attorneys

**CERTIFICATION OF SERVICE**

I hereby certify that on August 16, 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.

/s/ Jeffrey P. Mueller  
Jeffrey P. Mueller (ct27870)