

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

JOSEPH M. LAURINAITIS, a.k.a.
Road Warrior Animal,
JIMMY “SUPERFLY” SNUKA, by and through
his guardian, Carole Snuka,
PAUL ORDNDORFF, a.k.a. Mr. Wonderful,
SALAVADOR GUERRERO IV, a.k.a. Chavo
Guerrero, Jr.,
CHAVO GUERRERO, SR., a.k.a. Chavo Classic,
BRYAN EMMETT CLARK, JR., a.k.a. Adam
Bomb,
ANTHONY NORRIS, a.k.a. Ahmed Johnson,
JAMES HARRIS, a.k.a. Kamala,
DAVE HEBNER,
EARL HEBNER,
CHRIS PALLIES, a.k.a. King Kong Bundy,
KEN PATERA,
TERRY MICHAEL BRUNK, a.k.a. Sabu,
BARRY DARSOW, a.k.a. Smash,
BILL EADIE a.k.a. Ax,
JOHN NORD, a.k.a. The Bezerker,
JONATHAN HUGGER a.k.a. Johnny The Bull,
JAMES BRUNZELL, a.k.a. Jumpin’ Jim,
SUSAN GREEN, a.k.a. Sue Green,
ANGELO MOSCA, a.k.a. King Kong Mosca,
JAMES MANLEY, a.k.a. Jim Powers,
MICHAEL “MIKE” ENOS,
BRUCE “BUTCH” REED, a.k.a. The Natural,
CARLENE B. MOORE-BEGNAUD, a.k.a. Jazz,
SYLVAIN GRENIER,
OMAR MIJARES a.k.a. Omar Atlas,
DON LEO HEATON, a.k.a. Don Leo Jonathan,
TROY MARTIN, a.k.a. Shane Douglas,
MARC COPANI, a.k.a. Muhammad Hassan,
MARK CANTERBURY, a.k.a. Henry Godwin,
VICTORIA OTIS, a.k.a. Princess Victoria,
JUDY HARDEE a.k.a. Judy Martin,
MARK JINDRAK,
BERNARD KNIGHTON as Personal
Representative of the Brian Knighton, a.k.a.
Axl Rotten, Estate,
MARTY JANNETTY,
JON HEIDENREICH,

TERRY SZOPINSKI, a.k.a. The Warlord,
SIONE HAVEA VAILAHI, a.k.a. The Barbarian,
LARRY OLIVER, a.k.a. The Crippler,
BOBBI BILLIARD,
TIMOTHY SMITH, a.k.a. Rex King,
TRACY SMOTHERS, a.k.a. Freddie Joe Floyd,
MICHAEL R HALAC, a.k.a. Mantaur,
RICK JONES, a.k.a. Black Bart,
KEN JOHNSON, a.k.a. Slick,
GEORGE GRAY, a.k.a. One Man Gang,
FERRIN JESSE BARR, a.k.a. JJ Funk,
LOU MARCONI,
ROD PRICE,
DONALD DRIGGERS,
RODNEY BEGNAUD, a.k.a. Rodney Mack,
RONALD SCOTT HEARD, a.k.a. Outlaw Ron
Bass, and
BORIS ZHUKOV,

Plaintiffs,

v.

Case No. 3:16-cv-1209

WORLD WRESTLING
ENTERTAINMENT, INC., and
VINCENT K. MCMAHON, Individually and as
The Trustee of the Vincent K. McMahon
Irrevocable Trust U/T/A dtd. June 24, 2004, as the
Trustee of the Vincent K. McMahon 2008
Irrevocable Trust U/T/A dtd. December 23, 2008,
And as Special Trustee of the Vincent K. McMahon
2013 Irrev. Trust U/A dtd. December 5, 2013, and
as Trustee of Certain Other Unnamed McMahon
Family Trust, and as Controlling Shareholders of
WWE,

Defendants.

MOTION FOR *PRO HAC VICE* ADMISSION FOR KONSTANTINE W. KYROS

Pursuant to Local Rule 83.1(d) of the Local Rules of Civil Procedure for the District of Connecticut, the undersigned counsel, a member of the Bar of this Court, respectfully moves for

Konstantine W. Kyros, Esq. to be admitted *pro hac vice* to appear before this Court on behalf of the above-captioned Plaintiffs in the above-captioned matter.

1. Pursuant to Local Rule 83.1(d)(1), an affidavit of Konstantine Kyros, stating his qualifications for *pro hac vice* admission is attached as Exhibit A to this motion.
2. Pursuant to Local Rule 83.1(d)(2), the granting of this motion will not require the modification of any scheduling order entered in this matter.
3. Pursuant to Local Rule 83.1(d)(3), this motion is accompanied by payment of a fee of \$75.00 to the Clerk of this Court.
4. Pursuant to Local Rule 83.1(d)(4), Attorney Kyros will promptly file a certificate of good standing from the bar of the Commonwealth of Massachusetts, the state in which he resides, with the Clerk of this Court after this motion is granted.

WHEREFORE, the undersigned counsel respectfully moves for Konstantine W. Kyros, Esq. to be admitted *pro hac vice* in the above-captioned matter.

Dated: July 18, 2016

Respectfully submitted,

/s/ Brenden P. Leydon
Brenden P. Leydon, Esq.
TOOHER WOCL & LEYDON LLC
80 4th Street
Stamford, Connecticut 06905
Telephone: (203) 517-0456
Facsimile: 203-324-1407
BLeydon@toohewocl.com

CERTIFICATE OF SERVICE

I hereby certify that, on this 18th day of July, a copy of the 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/ Brenden P. Leydon
Brenden P. Leydon, Esq.