

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

MARCUS BAGWELL and SCOTT LEVY,	:	NO. 3:16-CV-01350-JCH
individually and on behalf of all others similarly	:	
situated,	:	
	:	
Plaintiffs,	:	
	:	
vs.	:	
	:	
WORLD WRESTLING ENTERTAINMENT,	:	
INC.,	:	
	:	
Defendant.	:	OCTOBER 27, 2017

MOTION TO SEAL EXHIBIT F TO DEFENDANT’S MEMORANDUM OF LAW IN SUPPORT OF MOTION TO COMPEL REGARDING PRIVILEGE ISSUES

Pursuant to Local Rule of Civil Procedure 5(e), Defendant World Wrestling Entertainment, Inc. (“WWE”) hereby moves to file under seal Exhibit F to its memorandum of law in support of its motion to compel regarding privilege issues.

Exhibit F to the memorandum of law in support of the motion to compel contains material that has been designated as Confidential pursuant to the Court’s Standing Protective Order governing this action because it implicates an individual’s legitimate expectation of privacy. Specifically, Exhibit F is a phone record that reflects the personal cellular telephone numbers of Plaintiff Scott Levy and Attorney Matthew Peterson.

Accordingly, WWE requests permission to file an unredacted version of Exhibit F under seal. WWE has served an unredacted version of this exhibit on Plaintiffs and has filed it under seal with the Court in accordance with Local Rule of Civil Procedure 5(e). A redacted version of this exhibit has been filed electronically.

DEFENDANT WORLD WRESTLING
ENTERTAINMENT, INC.

By: /s/ Jerry S. McDevitt

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CERTIFICATE OF SERVICE

I hereby certify that on October 27, 2017, 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 October 27, 2017, the documents referenced in this Motion to Seal were served on the following counsel by email.

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