

**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 31, 2017

NOTICE REGARDING MOTION TO SEAL

Pursuant to the Court’s Order regarding the Motion to Seal Exhibit F to Defendant’s Memorandum of Law in Support of its Motion to Compel Regarding Privilege Issues (Doc. No. 137), Defendant World Wrestling Entertainment (“WWE”) files this notice to provide clarification with respect to its filing of Exhibit F.

The version of Exhibit F that was filed publicly (Doc. No. 132-7) was a cover sheet indicating that the exhibit was filed under seal.

The version of Exhibit F that was filed under seal (Doc. No. 133) was the same version of the document that was produced to WWE by Plaintiff Scott Levy (“Plaintiff”) in this action. When Plaintiff produced Exhibit F, Plaintiff redacted the portions of the phone record reflecting calls that were not relevant to this action, but did not redact the portions of the phone record reflecting calls between Attorney Peterson and Plaintiff. WWE filed the document produced by Plaintiff under seal because it was marked “Confidential” as a result of its disclosure of Plaintiff’s personal cell phone number. Therefore, the version of Exhibit F that was filed under seal is, in fact, the “unredacted” version of the document that WWE has moved to seal.

WWE does not have the ability to file any less redacted version of the document on the public record because of Plaintiff's designation of the document as "Confidential" under the terms of the Court's Standing Protective Order.

DEFENDANT WORLD WRESTLING
ENTERTAINMENT, INC.

By: /s/ Jerry S. McDevitt

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CERTIFICATE OF SERVICE

I hereby certify that on October 31, 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.

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