

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

Marcus Bagwell and Scott Levy, :
individually and on behalf of all others: :
similarly situated, : Civil Action No. 3:16-cv-01350-JCH
: :
Plaintiffs, : :
: :
v. : Hon. Janet C. Hall
: :
World Wrestling Entertainment, Inc., : :
: :
Defendant. :

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION
OF TIME TO RESPOND TO DEFENDANT’S COUNTERCLAIM**

Pursuant to Local Rule 7(b), Plaintiff Scott Levy (“Plaintiff”), by his attorneys, respectfully submits this Unopposed Motion for an Extension of Time to Respond to Defendant World Wrestling Entertainment, Inc.’s (“Defendant”) Counterclaim, and in support of this Motion, states as follows:

1. On October 27, 2017, Defendant filed a counterclaim against Plaintiff for breach of contract based on an alleged violation of the non-disparagement provision found in Plaintiff’s early contract release. (Dkt. No. 135 at 30.)
2. The deadline for Plaintiff to answer or otherwise respond to Defendant’s counterclaim is on or before November 17, 2017.
3. On November 15, 2017, Plaintiff’s and Defendant’s counsel were in Pittsburgh, Pennsylvania for a deposition in this matter. After the deposition, the parties held substantive discussions regarding the claims at issue.

4. In order to allow sufficient time to review the allegations of Defendant's counterclaim and to prepare an appropriate response, Plaintiff's counsel requests a 14-day extension of time to answer or otherwise respond to Defendant's counterclaim, up to and including December 1, 2017. Defendant has no objection to Plaintiff's request for an extension of time.

5. There is good cause supporting Plaintiff's requested relief and sufficient justification for why Plaintiff did not file this Motion three days prior to the deadline.

6. This is Plaintiff's first request for an extension of time to answer or otherwise respond to Defendant's counterclaim, and this request is not being made for the purposes of delay or any other improper reason.

7. The granting of this motion will not require modification of a scheduling order pursuant to Fed. R. Civ. P. 16(b) or the deadlines established by the standing order on scheduling in civil cases.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court grant this unopposed Motion and enter an Order extending the deadline in which Plaintiff must answer or otherwise respond to Defendant's counterclaim to and including December 1, 2017.

Dated: November 16, 2017

Respectfully submitted,

/s/ Michael Silverman

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that a true and correct copy of the foregoing Plaintiff's Unopposed Motion for Extension of Time to Respond to Defendant's Counterclaim was filed this 16th day of November 2017 via the electronic filing system of the District of Connecticut, which will automatically serve all counsel of record.

/s/ Michael Silverman _____
One of the Attorneys for Plaintiffs