

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

MARCUS BAGWELL and SCOTT LEVY,
Individually
and on behalf of all others similarly situated,

NO. 3:16-CV-01350-JCH

Plaintiffs,

vs.

WORLD WRESTLING ENTERTAINMENT, INC.
and WCW, INC.,

Defendants.

**Record Filing of Attorneys Lien
And
Conditional Motion to Withdraw**

Pursuant to Fed. R. Civ. P. and District Court of Connecticut Local Rule 7(e), Attorney Clinton A. Krislov respectfully requests an order permitting him to be relieved as counsel for Plaintiffs in the above-captioned case, and recording his and the Krislov firm's assertion of attorneys liens, in files and in any recovery in the case. In support of this request, Attorney Krislov submits the following, for attorney Krislov and the Krislov firm:

1. We have represented the plaintiffs in this matter from the beginning, under signed contingent fee agreements. On August 9, 2016, we, with Mr. Leydon's firm, filed the initial complaint in this matter. On August 26, 2016, this court granted our motion to appear pro hac vice. We proceeded to represent the plaintiffs through the motion for Class Certification (still pending), and the court's May 5, 2017 Order granting/denying parts of the Complaint.

2. On May 10, 2017, our associate attorney on the matter, Mr. Matthew Peterson, terminated his employment with the Krislov firm. On May 12, 2017, by Certified Mail and email, we asserted our statutory attorneys lien.

3. Shortly thereafter, we were notified that the plaintiffs were terminating our engagement as counsel.

4. We were eventually contacted by persons representing that they would be engaged and enter the case for the plaintiffs. Those subsequent counsel have now appeared and been granted leave to appear as ongoing counsel for plaintiffs.

5. For the record, undersigned counsel Krislov requests leave to withdraw as an attorney in the matter, but asserts both our statutory attorneys lien in any proceeds, our contract right to appropriate fees, whether by contract, statute or equity, class or individual case resolution, and our retaining lien in the files; and would like to be kept listed in the cm/ecf system, so as to receive notice of proceedings in the case.

Respectfully submitted,
/s/Clinton A. Krislov
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CERTIFICATION OF SERVICE

I hereby certify that on August 1, 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/Clinton A. Krislov

