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. : NOVEMBER 6, 2017

MOTION TO SEAL EXHIBIT G TO DEFENDANT'S MEMORANDUM OF LAW IN SUPPORT OF MOTION TO COMPEL REDACTED INFORMATION FROM PHONE RECORDS

Pursuant to Local Rule of Civil Procedure 5(e), Defendant World Wrestling Entertainment, Inc. ("WWE") hereby moves to file under seal Exhibit G to its memorandum of law in support of its motion to compel redacted information from phone records.

Exhibit G to the memorandum of law in support of the motion to compel contains material that has been designated by Plaintiffs as Confidential pursuant to the Court's Standing Protective Order governing this action. Specifically, Exhibit G contains phone records that reflect the cellular telephone numbers of Plaintiffs in this case.

Accordingly, WWE requests permission to file Exhibit G under seal. WWE has served this exhibit on Plaintiffs and has filed it under seal with the Court in accordance with Local Rule of Civil Procedure 5(e). The version of Exhibit G that was filed under seal reflects the records in the same form that they were produced to WWE by Plaintiffs.

DEFENDANT WORLD WRESTLING ENTERTAINMENT, INC.

By: <u>/s/ Jerry S. McDevitt</u>

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Its Attorneys

CERTIFICATE OF SERVICE

I hereby certify that on November 6, 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 November 6, 2017, the documents referenced in this Motion to Seal were served on the following counsel by email.

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