

**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.	:	

**PLAINTIFFS' UNOPPOSED MOTION TO
HOLD CASE DEADLINES IN ABEYANCE**

Plaintiffs Scott Levy and Marcus Bagwell ("Plaintiffs"), by their attorneys, respectfully submit this Unopposed Motion to Hold Case Deadlines in Abeyance for a seven (7)-day period, and in support of this Motion, state as follows:

1. For approximately the past ten (10) days or so, the parties have been engaged in active discussions regarding a potential stipulation of dismissal that would effectively terminate all claims pending in this matter.

2. In order to allow the parties sufficient time to complete their negotiations and finalize a stipulation of dismissal, Plaintiffs respectfully request that the Court hold the following case deadlines in abeyance for a period of seven (7) days from and after December 1, 2017: (i) Levy's answer or response to Defendant's counterclaim, which is currently due on or before December 1, 2017 (Dkt. No. 155); and (ii) the Court's Order requiring Levy to submit certain documents at issue for an

in camera review, which is currently due on or before November 29, 2017 (Dkt. No. 159).

3. Plaintiffs are not seeking an extension of the November 30, 2017 deadline to disclose any expert witnesses in accordance with Federal Rule of Civil Procedure 26(a)(2) (Memorandum of Conference and Scheduling Order, Dkt. No. 84).

4. Defendant has no objection to Plaintiffs' request to hold the foregoing case deadlines in abeyance while the parties finalize a stipulation of dismissal.

5. 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, Plaintiffs respectfully request that this Honorable Court grant this unopposed Motion and enter an Order holding the case deadlines specified above in abeyance for the requested seven (7)-day period.

Dated: November 28, 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 Plaintiffs' Unopposed Motion to Hold Case Deadlines in Abeyance was filed this 28th 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