

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

IN RE WORLD WRESTLING	:	CIVIL NO. 3:14-CV-01070-AWT
ENTERTAINMENT, INC.	:	
SECURITIES LITIGATION	:	<u>CLASS ACTION</u>
	:	
	:	FEBRUARY 20, 2015

**DEFENDANTS' MOTION FOR PERMISSION TO FILE  
CONSOLIDATED BRIEF IN EXCESS OF PAGE LIMITATION**

Pursuant to Local Rule of Civil Procedure 7(a)(2), Defendants World Wrestling Entertainment, Inc., Vincent K. McMahon, George A. Barrios, Michelle D. Wilson, and Stephanie McMahon Levesque (collectively, "Defendants") respectfully move for permission to file a consolidated brief in lieu of five individual briefs in support of a motion to dismiss. In support of the instant motion, Defendants state as follows:

1. On January 5, 2015, Plaintiffs filed a Consolidated Amended Complaint ("Complaint") in this putative securities class action that spanned 48 pages and 114 paragraphs and purported to assert various claims against five different defendants. (Doc. No. 71.)
2. Pursuant to the Scheduling Order in this case, Defendants must file any motion to dismiss the Complaint by March 9, 2015. (Doc. No. 66.)
3. Although each individual Defendant would have the right to file a separate brief in support of a separate motion to dismiss the claims asserted against that Defendant, Defendants seek to file a consolidated brief in support of a single motion to dismiss all of the claims in the Complaint in order to avoid unnecessary repetition associated with multiple filings.
4. Defendants have worked hard to streamline their brief but request permission of the Court to file a brief in excess of the page limitation for an individual brief for several reasons. Defendants are moving to dismiss a lengthy Complaint in a complex securities class action. In

their consolidated brief in support of the motion to dismiss, Defendants must comprehensively address the many various disclosures made by the Company that are relevant to this matter.

Defendants must address the numerous deficiencies in the Complaint and the legal arguments related to each of those deficiencies. Defendants also must address the unique arguments with respect to the allegations and claims asserted against the individual Defendants.

5. Based on the advanced draft that Defendants have prepared, Defendants will require no more than 65 pages to adequately brief their consolidated motion to dismiss. Defendants believe that the additional length of the brief will facilitate the Court's resolution of the issues raised in the motion.

6. The undersigned has contacted Lead Counsel for Plaintiffs, Kahn Swick & Foti LLC, and Plaintiffs have no position on this motion.

WHEREFORE, Defendants request that the Court grant their motion for permission to file a consolidated brief in support of their motion to dismiss that is up to 65 pages in length.

DEFENDANTS WORLD WRESTLING  
ENTERTAINMENT, INC., VINCENT K.  
MCMAHON, GEORGE A. BARRIOS,  
MICHELLE D. WILSON, and STEPHANIE  
MCMAHON LEVESQUE

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**CERTIFICATION**

I hereby certify that on this date 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)