

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT**

IN RE WORLD WRESTLING ENTERTAINMENT, INC.
SECURITIES LITIGATION

Civil No. 14c1070
(AWT)

**MOTION OF DEFENDANTS
WORLD WRESTLING ENTERTAINMENT, INC., VINCENT K.
MCMAHON, GEORGE A. BARRIOS, MICHELLE D. WILSON,
AND STEPHANIE MCMAHON LEVESQUE TO DISMISS THE
CONSOLIDATED AMENDED COMPLAINT**

Defendants World Wrestling Entertainment, Inc., Vincent K. McMahon, George A. Barrios, Michelle D. Wilson, and Stephanie McMahon Levesque, by counsel, respectfully move the Court, pursuant to Rules 9(b) and 12(b)(6) of the Federal Rules of Civil Procedure and the Private Securities Litigation Reform Act, to dismiss Plaintiffs' Consolidated Amended Complaint. As set forth in the accompanying Memorandum of Law, the claims against all of the Defendants should be dismissed because, among other reasons,

1. Plaintiffs have failed to plead a false statement or omission,
2. Plaintiffs have not pled facts creating a strong inference of scienter,
3. Plaintiffs have failed to plead loss causation, and
4. The Company's statements are protected by the PSLRA's safe harbor for forward-looking statements.

ORAL ARGUMENT REQUESTED

In addition, the Section 20A claims against Stephanie McMahon Levesque should be dismissed because, among other reasons, she traded pursuant to a Rule 10b5-1 plan entered into and publicly-disclosed in an SEC filing seven months before the beginning of the class period.

While all of the claims should be dismissed even taking into account the allegations plaintiffs attribute to a single “confidential witness,” those allegations cannot be relied on here because the confidential witness had no involvement in the underlying events, left the company before the key events occurred, and has submitted an affidavit stating that 1) the plaintiffs never gave him an opportunity to review the statements they attributed to him in the Consolidated Amended Complaint, 2) the statements attributable to him should not have been attributed to him, and 3) he does not believe any facts were misrepresented by any of the defendants in the Consolidated Amended Complaint.

Dated: March 9, 2015

Respectfully submitted,

/s/ Jerry S. McDevitt
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Attorneys for World Wrestling Entertainment, Inc.,
Vincent K. McMahon, George A. Barrios, Michelle
D. Wilson, and Stephanie McMahon Levesque

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)