

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

JANEL GRANT,

Plaintiff,

v.

WORLD WRESTLING ENTERTAINMENT, INC.
n/k/a WORLD WRESTLING ENTERTAINMENT,
LLC; VINCENT K. MCMAHON, and JOHN
LAURINAITIS,

Defendants.

Civil Action No.: 3:24-cv-00090 (JAM)

**STIPULATION AND [PROPOSED] ORDER GOVERNING
BRIEFING SCHEDULE ON MOTIONS TO COMPEL ARBITRATION**

WHEREAS, on January 25, 2024, Plaintiff Janel Grant filed a Complaint against Defendants World Wrestling Entertainment, LLC (“WWE”), Vincent K. McMahon (“McMahon”), and John Laurinaitis (“Laurinaitis”), initiating the above-captioned action in this Court;

WHEREAS, on March 15, 2024, Plaintiff provided waiver of service of summons forms to all Defendants, pursuant to Federal Rule of Civil Procedure 4(d), requesting that the forms be signed and returned to Plaintiff within 30 days;

WHEREAS, all Defendants timely returned the waiver of service forms to Plaintiff;

WHEREAS, pursuant to Federal Rules of Civil Procedure 4(d)(3) and 12(a)(1)(A)(ii), Defendants' deadline to serve answer or other responsive pleadings to the Complaint is 60 days after Plaintiff requested waiver of service from Defendants, or May 14, 2024;

WHEREAS, on April 23, 2024, McMahon filed a motion for an order compelling arbitration and staying this action pending arbitration;

WHEREAS, on May 2, 2024, Laurinaitis filed a motion to compel arbitration and adoption of and joinder in McMahon's motion to compel arbitration;

WHEREAS, WWE also anticipates filing a motion to compel arbitration and stay this action pending arbitration;

WHEREAS, the parties have met and conferred with regard to a schedule governing briefing on Defendants' motions to compel arbitration and suspending the current deadlines to answer, move or otherwise respond to the Complaint while the motions to compel arbitration are pending;

IT IS HEREBY STIPULATED AND AGREED by the parties hereto, through their undersigned counsel, subject to the approval of the Court, that:

1. Defendants' motions to compel arbitration and memoranda of law in support of their motions shall be filed by May 14, 2024;
2. Plaintiff's opposition or oppositions to Defendants' motions to compel arbitration shall be filed by June 4, 2024;
3. Defendants' reply memoranda in support of their motions to compel arbitration shall be filed by June 18, 2024;
4. Any applicable deadline(s), pursuant to Federal Rule of Civil Procedure 12(a), for Defendants to serve answers to the Complaint or other responsive

pleadings, including any motions pursuant to Federal Rule of Civil Procedure 12(b), shall be suspended pending the Court's adjudication of Defendants' motions to compel arbitration;

5. In the event that the Court denies, in whole or in part, one or more of Defendants' motions to compel arbitration, the Defendant(s) whose motion(s) have been denied shall serve answers or responsive pleadings, including any motions pursuant to Federal Rule of Civil Procedure 12(b), within 30 days after the Court denies the motion(s) to compel.

Dated: May 7, 2024

By: /s/ Ann E. Callis

HOLLAND LAW FIRM, LLC

Eric D. Holland (*pro hac vice*)

Gregory R. Jones (*pro hac vice*)

211 North Broadway, Suite 2625

St. Louis, MO 63102

Phone: (314) 241-8111

Fax: (314) 241-5554

eholland@hollandtriallawyers.com

gjones@hollandtriallawyers.com

Ann E. Callis (*pro hac vice*)

6181 Bennett Drive, Suite 210

Edwardsville, Illinois 62025

Phone: (618) 452-1323

Fax: (618)452-8024

acallis@hollandtriallawyers.com

Attorneys for Plaintiff Janel Grant

By: /s/ Michael C. D'Agostino

Michael C. D'Agostino
Morgan Lewis & Bockius LLP
Michael C. D'Agostino (ct17294)
One State St., 22nd Fl.
Hartford, CT 06103-3178
Tel: (860) 240-2700
Fax: (860) 240-2701
michael.dagostino@morganlewis.com

David A. McManus (*pro hac vice* pending)
One Federal Street
Boston, MA 02110-1726
Tel: (617) 341-7700
Fax: (617) 341-7701
david.mcmanus@morganlewis.com

**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**

Daniel J. Toal (*pro hac vice* pending)
Liza M. Velazquez (*pro hac vice* pending)
1285 Avenue of the Americas
New York, NY 10019-6064
Tel: (212) 373-3000
Fax: (212) 757-3990
dtoal@paulweiss.com
lvelazquez@paulweiss.com

Mitchell D. Webber (*pro hac vice* pending)
2001 K Street, NW
Washington, DC 20006-1047
Tel: (202) 223-7442
Fax: (202) 379-4162
mwebber@paulweiss.com

*Attorneys for Defendant World Wrestling
Entertainment, LLC*

By: /s/ Jonathan L. Shapiro

Jonathan L. Shapiro
**McELROY, DEUTSCH, MULVANEY, &
CARPENTER, LLP**
James A. Budinetz (ct16068)
One State Street, 14th Floor
Hartford, CT 06103
Tel: (860) 522-5175
Fax: (860) 522-2796
jbudinetz@mdmc-law.com

KASOWITZ BENSON TORRES LLP

Jessica T. Rosenberg (*pro hac vice*)
Jonathan L. Shapiro (*pro hac vice*)
1633 Broadway
New York, NY 10019
Tel: (212) 506-1700
Fax: (212) 506-1800
JRosenberg@kasowitz.com
JShapiro@kasowitz.com

Attorneys for Defendant Vincent K. McMahon

By: /s/ Edward M. Brennan

Edward M. Brennan
MITCHELL & SHEAHAN, P.C.
Robert B. Mitchell (ct02662)
999 Oronoque Lane, Suite 203
Stratford, CT 06614
Tel: (203) 873-0240
Fax: (203) 873-0235
rbmitchell@mitchellandsheahan.com

**LAW OFFICE OF EDWARD M.
BRENNAN, P.A.**

Edward M. Brennan (*pro hac vice*)
18534 N. Dale Mabry Highway
Tampa, Florida 33558
Tel: (813) 224-9141
ebrennan@edbrennanlaw.com

Attorney for Defendant John Laurinaitis

SO ORDERED this ____ day of _____, 2024.

JEFFREY A. MEYER
United States District Judge