

**UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT**

WARREN GANUES and DOMINIC  
VARRIALE, on Behalf of Themselves and  
All Others Similarly Situated,

Plaintiffs,

v.

WORLD WRESTLING  
ENTERTAINMENT, INC., VINCENT K.  
MCMAHON, and GEORGE A.  
BARRIOS,

Defendants.

CURTIS SWANSON, on Behalf of  
Himself and All Others Similarly Situated,

Plaintiff,

v.

WORLD WRESTLING  
ENTERTAINMENT, INC., VINCENT K.  
MCMAHON, and GEORGE A.  
BARRIOS,

Defendants.

**Civil Action No. 3:14-cv-01070-AWT**

CLASS ACTION

**RESPONSE OF ADNAN SHAFEEQ TO  
COMPETING LEAD PLAINTIFF  
MOTIONS**

**Civil Action No. 3:14-cv-01228-JCH**

CLASS ACTION

Lead Plaintiff movant, Adnan Shafeeq (“Mr. Shafeeq”), respectfully submits that after reviewing the motions filed by the various lead plaintiff movants in the above-captions actions, it appears that Lead Plaintiff movant the WWE Family Investor Group, with claimed losses of over \$3 million, has the largest financial interest in the relief sought in the litigation and is, therefore, the presumptive Lead Plaintiff.

No Oral Argument Requested

In the event that the Court does not appoint WWE Family Investor Group as Lead Plaintiff, Mr. Shafeeq, who has the second largest financial interest in the relief sought from among the Lead Plaintiff movants and is, therefore, next in line to be appointed Lead Plaintiff, stands ready, willing and able to serve as Lead Plaintiff.

Dated: October 3, 2014

IZARD NOBEL LLP

/s/ Mark P. Kindall

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*Counsel for Adnan Shafeeq and  
Proposed Lead Counsel for the Class*

**CERTIFICATE OF SERVICE**

I hereby certify that the Response of Adnan Shafeeq to Competing Lead Plaintiff Motions was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants on October 3, 2014.

*/s/ Mark P. Kindall*

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Mark P. Kindall