

ORDER 12-16-02

The foregoing motion, having been duly presented to the court, it is hereby ORDERED:

GRANTED/DENIED.

only as to areas <sup>specifically</sup> raised in this motion.

BY THE COURT,

(Rogers, J)

*Shupp-TAR*

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Judge/Clerk

SUPERIOR COURT  
CITY OF STAMFORD  
CONNECTICUT

SEP 18 10 33 AM '02

DOCKET NO.: X05-CV-000180933-S

SUPERIOR COURT

STANLEY SHENKER & ASSOCIATES, INC.,

COMPLEX LITIGATION  
DOCKET AT STAMFORD

Plaintiff,

vs.

WORLD WRESTLING FEDERATION  
ENTERTAINMENT, INC.,

Defendant.

SEPTEMBER 18, 2002

**MOTION FOR ORDER OF COMPLIANCE REGARDING IMPROPER INSTRUCTIONS  
DURING THE DEPOSITION OF STANLEY SHENKER**

Defendant, World Wrestling Federation Entertainment, Inc. ("WWE"), by and through its undersigned counsel, and pursuant to Practice Book Section 13-14, respectfully moves for an order compelling Stanley Shenker ("Shenker") to answer certain questions posed during his deposition. Shenker was instructed by counsel not to answer such questions based on claims of attorney-client and work product privileges. WWE maintains that the instructions not to answer were improper and that Shenker should be ordered to answer the questions.

**I. Background Facts**

On May 30, 2002, WWE took the deposition of Shenker, president and owner of Plaintiff, Stanley Shenker and Associates, Inc. ("SSAI"). During the deposition, SSAI's counsel instructed Shenker not to answer foundational questions pertaining to discovery matters by invoking the

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