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 16 *Ultimate Fighting Championship and UFC*

17 *Additional Counsel Listed on Signature Page*

18 UNITED STATES DISTRICT COURT  
 19 DISTRICT OF NEVADA

20 Cung Le, Nathan Quarry, Jon Fitch, on behalf  
 of themselves and all others similarly situated,

21 Plaintiffs,

22 v.

23 Zuffa, LLC, d/b/a Ultimate Fighting  
 24 Championship and UFC,

25 Defendant.

Lead Case No.: 2:15-cv-01045-RFB-  
 (PAL)

Member Case Nos.:

2:15-cv-01046-RFB-(PAL)

2:15-cv-01055-RFB-(PAL)

2:15-cv-01056-RFB-(PAL)

2:15-cv-01057-RFB-(PAL)

**STIPULATION TO FILE A  
 CONSOLIDATED COMPLAINT AND TO  
 EXTEND ZUFFA, LLC'S DEADLINE TO  
 ANSWER PLAINTIFFS'  
 CONSOLIDATED AMENDED  
 COMPLAINT ACCORDINGLY**

**(First Request)**

1 Luis Javier Vazquez and Dennis Lloyd  
2 Hallman, on behalf of themselves and all  
3 others similarly situated,

4 Plaintiffs,

5 v.

6 Zuffa, LLC, d/b/a Ultimate Fighting  
7 Championship and UFC,

8 Defendant.

Case No. 2:15-cv-01055 RFB-(PAL)

9 Brandon Vera and Pablo Garza, on behalf of  
10 themselves and all others similarly situated,

11 Plaintiffs,

12 v.

13 Zuffa, LLC, d/b/a Ultimate Fighting  
14 Championship and UFC,

15 Defendant.

Case No. 2:15-cv-01056 RFB-(PAL)

16 Gabe Ruediger and Mac Danzig, on behalf of  
17 themselves and all others similarly situated,

18 Plaintiffs,

19 v.

20 Zuffa, LLC, d/b/a Ultimate Fighting  
21 Championship and UFC,

22 Defendant.

Case No. 2:15-cv-01057 RFB-(PAL)

23 Kyle Kingsbury and Darren Uyenoyama, on  
24 behalf of themselves and all others similarly  
25 situated,

26 Plaintiffs,

27 v.

28 Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,

Defendant.

Case No. 2:15-cv-01046 RFB-(PAL)

1 **STIPULATION**

2 Plaintiffs, Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez, Dennis  
3 Hallman, Brandon Vera, Pablo Garza, Gabe Ruediger, Mac Danzig, Kyle Kingsbury and  
4 Darren Uyenoyama, and Defendant Zuffa, LLC (collectively, “the Parties”) file this  
5 Stipulation To File A Consolidated Amended Complaint And To Extend Defendant Zuffa,  
6 LLC’s Deadline to Answer Plaintiffs’ Consolidated Amended Complaint Accordingly.

7 On September 25, 2015, the Court held a hearing on Zuffa’s Motions to Dismiss  
8 each of Plaintiffs’ five substantively identical complaints. On September 27, 2015, Minute  
9 Orders were entered denying Zuffa’s Motions to Dismiss each of Plaintiffs’ five  
10 complaints. *Le* Dkt. 186, *Vazquez* Dkt. 77, *Vera*, Dkt. 76, *Ruediger* Dkt. 52, *Kingsbury*  
11 *Dkt. 48*.

12 On October 12, 2015, the parties filed a Stipulation to Extend Defendant Zuffa,  
13 LLC’s Deadline To Answer Plaintiffs’ Complaints. (Dkt. 191.) At the November 17th  
14 Status Conference, the Court indicated it would grant the stipulation once a corrected  
15 image was filed in compliance with Local Rule 6. Because this stipulation renders moot  
16 Dkt. 191, the parties will withdraw Dkt. 191.

17 To promote efficiency, the parties further agree that within thirty (30) days of the  
18 entry of an Order approving this Stipulation by the Court, Plaintiffs may file a  
19 Consolidated Amended Complaint that consolidates each of the five complaints in *Le*,  
20 *Vazquez*, *Vera*, *Ruediger*, and *Kingsbury* into a single consolidated complaint. At this  
21 time, Plaintiffs do not seek leave to make substantive changes to the allegations in the  
22 proposed Consolidated Amended Complaint, but may reduce the total number of proposed  
23 representative plaintiffs.

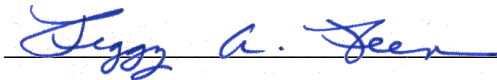
24 The Parties further agree that Zuffa may have thirty (30) days from the filing of the  
25 Consolidated Amended Complaint to file a consolidated Answer to the Plaintiffs’  
26 proposed Consolidated Amended Complaint. Accordingly, the parties request that the  
27 Court enter an Order approving the instant Stipulation To File A Consolidated Amended  
28 Complaint And To Extend Defendant Zuffa, LLC’s Deadline to Answer Plaintiffs’

1 Consolidated Amended Complaint Accordingly. The extension will not alter the date of  
2 any event or deadline already fixed by Court order. This is the Plaintiffs' first request to  
3 file a consolidated amended complaint and Zuffa's second request for an extension of  
4 time with regard to its Answers.

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**ORDER**

IT IS SO ORDERED:

  
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Hon. Peggy A. Leen

UNITED STATES MAGISTRATE JUDGE

DATED: November 20, 2015

1 DATED: November 19, 2015

DATED: November 19, 2015

2 /s/ Michael Dell'Angelo

/s/ John F. Cove, Jr.

3 Michael Dell'Angelo

JOHN F. COVE, JR.

4 Eric L. Cramer

(Pro Hac Vice granted)

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Brandon Vera, Pablo Garza, Gabe Ruediger,  
Mac Danzig, Kyle Kingsbury, and Darren  
Uyenoyama*

1 **ATTESTATION OF FILER**

2 The signatories to this document are myself and Michael Dell'Angelo, and I have  
3 obtained Mr. Dell'Angelo's concurrence to file this document on his behalf.  
4

5 Dated: November 19, 2015

BOIES, SCHILLER & FLEXNER LLP

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that service of the foregoing **STIPULATION TO FILE A CONSOLIDATED COMPLAINT AND TO EXTEND ZUFFA, LLC’S DEADLINE TO ANSWER PLAINTIFFS’ CONSOLIDATED AMENDED COMPLAINT ACCORDINGLY** was served on November 19, 2015 via the Court’s CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ Suzanne Jaffe

An employee of Boies, Schiller & Flexner, LLP