

1 Joseph R. Saveri (State Bar No. 130064)
 JOSEPH SAVERI LAW FIRM, INC.
 2 555 Montgomery Street, Suite 1210
 San Francisco, California 94111
 3 Telephone: (415) 500-6800
 4 Facsimile: (415) 395-9940
 jsaveri@saverilawfirm.com

5
 6 Richard A. Koffman (*pro hac vice*)
 COHEN MILSTEIN SELLERS & TOLL, PLLC
 7 1100 New York Ave., N.W., Suite 500, East Tower
 Washington, D.C. 20005
 8 Telephone: (202) 408-4600
 Facsimile: (202) 408-4699
 9 rkoffman@cohenmilstein.com

10 Eric L. Cramer (*pro hac vice*)
 11 BERGER & MONTAGUE, P.C.
 1622 Locust Street
 12 Philadelphia, PA 19103
 Telephone: (215) 875-3000
 13 Facsimile: (215)875-4604
 14 ecramer@bm.net

15 *Attorneys for Individual and Representative Plaintiffs*
 16 *Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera,*
Luis Javier Vazquez, and Kyle Kingsbury

17 [Additional Counsel Listed on Signature Page]

18 **UNITED STATES DISTRICT COURT**

19 **DISTRICT OF NEVADA**

20 **Cung Le, Nathan Quarry, Jon Fitch, Brandon**
Vera, Luis Javier Vazquez, and Kyle
 21 **Kingsbury on behalf of themselves and all**
 22 **others similarly situated,**

23 **Plaintiffs,**

24 **vs.**

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

26 **Defendant.**

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

JOINT STIPULATION AND
ORDER REGARDING
AUTHENTICITY OF DOCUMENTS

1 WHEREAS, Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and
2 Kyle Kingsbury (“Plaintiffs”) commenced the above-captioned action (the “Litigation”) against
3 Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC (“Defendant” and together with
4 Plaintiffs, “the Parties” and individually each a “Party”) on December 16, 2014;

5 WHEREAS, the Parties subsequently have produced millions of pages of documents in
6 connection with discovery in the Litigation;

7 WHEREAS, the Parties have determined that it is in their mutual interest to avoid the
8 significant and unnecessary burden and expense associated with the document-by-document
9 authentication of documents, and that stipulating to the authenticity of certain documents will
10 promote the orderly and efficient progress of the Litigation.

11 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by Defendant as
12 follows:

13 1. Subject to the exceptions stated below, and absent affirmative evidence that a
14 document or thing is not what it purports to be, Plaintiffs agree that, for purposes of Rule 901 of the
15 Federal Rules of Evidence, Plaintiffs will not contest the authenticity of any document or thing,
16 including any true and correct copy thereof, produced by Plaintiffs in connection with the
17 Litigation.

18 2. Subject to the exceptions stated below, and absent affirmative evidence that a
19 document or thing is not what it purports to be, Defendant agrees that, for purposes of Rule 901 of
20 the Federal Rules of Evidence, Defendant will not contest the authenticity of any document or
21 thing, including any true and correct copy thereof, produced by Defendant in connection with the
22 Litigation.

23 3. The Parties’ agreements in paragraphs 1 and 2 of this stipulation do not apply to
24 handwritten notes. If a document or thing produced by a Party also bears handwritten notes, the
25 Parties’ agreements do not apply to the handwritten notes portion of the document, but do apply to
26 the remainder of the document or thing. The Parties agree that, at a mutually agreed upon time prior
27 to trial, each Party may identify to the other Party a reasonable number of documents and things
28 containing handwritten notes as to which that Party desires a stipulation of authenticity. Each Party

1 agrees to give good faith consideration to a reasonable request from the other party pertaining to
2 handwritten notes.

3 4. The Parties agree that, at a mutually agreed upon time prior to trial, each Party may
4 identify to the other Party a reasonable number of third-party documents and things as to which that
5 Party desires a stipulation of authenticity. The other Party agrees to give good faith consideration to
6 a reasonable request pertaining to third-party documents and things.

7 5. Except to the extent authenticity is established by and within the scope of the
8 express terms of this stipulation, this stipulation does not affect either (1) Plaintiffs' ability to
9 contest the authenticity of any document or thing produced by Defendant or (2) Defendant's ability
10 to contest the authenticity of any document or thing produced by Plaintiffs.

11 6. In the event that a dispute arises regarding the authenticity of a document, the
12 Parties agree to meet and confer in good faith promptly about the authenticity of such document(s)
13 and, if necessary, to expedite any related motions for resolution by the Court.

14 7. Nothing in this stipulation shall be construed as an agreement that any documents or
15 things that are subject to this stipulation are admissible into evidence by any Party, except as
16 expressly addressed herein. The Parties hereby expressly reserve the right to object to the
17 admissibility of any document or thing under any grounds permitted by law and not expressly
18 addressed herein.

19 **IT IS SO ORDERED:**



20 _____
21 RICHARD F. BOULWARE, II
22 UNITED STATES DISTRICT COURT JUDGE

23 DATED: _____ April 13, 2017
24
25
26
27
28

1 DATED this 12th day of April, 2017

2

3 **WOLF, RIFKIN, SHAPIRO,**
4 **SCHULMAN & RABKIN, LLP**

BOIES SCHILLER FLEXNER LLP

4

5 By: /s/ Don Springmeyer

By: /s/ Stacey K. Grigsby

6 Don Springmeyer
7 Nevada Bar No. 1021
8 Bradley S. Schrager
9 Nevada Bar No. 10217
10 Justin C. Jones
11 Nevada Bar No. 8519
12 3556 E. Russell Road, Second Floor
Las Vegas, Nevada 89120
(702) 341-5200/Fax: (702) 341-5300
dspringmeyer@wrslawyers.com
bschrager@wrslawyers.com
jjones@wrslawyers.com

William A. Isaacson (admitted *pro hac vice*)
Stacey K. Grigsby (admitted *pro hac vice*)
Nicholas A. Widnell (admitted *pro hac vice*)
1401 New York Ave, N.W., 11th Floor
Washington, D.C. 20005
Phone: (202) 237-2727/Fax: (202) 237-6131
wisaacson@bsfillp.com
sgrigsby@bsfillp.com
nwidnell@bsfillp.com

*Attorneys for Defendant Zuffa, LLC, d/b/a
Ultimate Fighting Championship and UFC*

13 *Liaison Counsel for the Classes and Attorneys*
14 *for Individual and Representative Plaintiffs*
15 *Cung Le, Nathan Quarry, Jon Fitch, Luis*
16 *Javier Vazquez, Brandon Vera, and Kyle*
17 *Kingsbury*

CAMPBELL & WILLIAMS
Donald J. Campbell (State Bar No. 1216)
J. Colby Williams (State Bar No. 5549)
700 South 7th Street
Las Vegas, Nevada 89101
Phone: (702) 382-5222/Fax: (702) 382-0540
djc@campbellandwilliams.com
jcw@campbellandwilliams.com

*Attorneys for Defendant Zuffa, LLC, d/b/a
Ultimate Fighting Championship and UFC*

20

21

22

23

24

25

26

27

28

1 **COHEN MILSTEIN SELLERS**
2 **& TOLL, PLLC**
3 Benjamin D. Brown (admitted *pro hac vice*)
4 Richard A. Koffman (admitted *pro hac vice*)
5 Hiba Hafiz (admitted *pro hac vice*)
6 1100 New York Ave., N.W.,
7 Suite 500, East Tower
8 Washington, D.C. 20005
9 Phone: (202) 408-4600/Fax: (202) 408 4699
10 bbrown@cohenmilstein.com
11 rkoffman@cohenmilstein.com
12 hhafiz@cohenmilstein.com

13 *Co-Lead Counsel for the Classes and*
14 *Attorneys for Individual and Representative*
15 *Plaintiffs Cung Le, Nathan Quarry, Jon Fitch,*
16 *Luis Javier Vazquez, Brandon Vera, and Kyle*
17 *Kingsbury*

18 **BERGER & MONTAGUE, P.C.**
19 Eric L. Cramer (admitted *pro hac vice*)
20 Michael Dell' Angelo (admitted *pro hac vice*)
21 Patrick Madden (admitted *pro hac vice*)
22 1622 Locust Street
23 Philadelphia, Pennsylvania 19103
24 Phone: (215) 875-3000/Fax: (215) 875-4604
25 ecramer@bm.net
26 mdellangelo@bm.net
27 pmadden@bm.net

28 *Co-Lead Counsel for the Classes and*
Attorneys for Individual and Representative
Plaintiffs Cung Le, Nathan Quarry, Jon Fitch,
Luis Javier Vazquez, Brandon Vera, and Kyle
Kingsbury

BOIES SCHILLER FLEXNER LLP

Richard J. Pocker (State Bar No. 3568)
300 South Fourth Street, Suite 800
Las Vegas, Nevada 89101
Phone: (702) 382-7300/Fax: (702) 382-2755
rpocker@bsflp.com

Attorney for Defendant Zuffa, LLC, d/b/a Ultimate
Fighting Championship and UFC

1 **JOSEPH SAVERI LAW FIRM, INC.**

2 Joseph R. Saveri (State Bar No. 130064)
3 Joshua P. Davis (admitted *pro hac vice*)
4 Matthew S. Weiler (admitted *pro hac vice*)
5 Kevin E. Rayhill (admitted *pro hac vice*)
6 555 Montgomery Street, Suite 1210
7 San Francisco, California 94111
8 Phone: (415) 500-6800/Fax: (415) 395-9940
9 jsaveri@saverilawfirm.com
10 jdavis@saverilawfirm.com
11 mweiler@saverilawfirm.com
12 krayhill@saverilawfirm.com

13 *Co-Lead Counsel for the Classes and*
14 *Attorneys for Individual and Representative*
15 *Plaintiffs Cung Le, Nathan Quarry, Jon Fitch,*
16 *Luis Javier Vazquez, Brandon Vera, and Kyle*
17 *Kingsbury*

18 **WARNER ANGLE HALLAM JACKSON**
19 **& FORMANEK PLC**

20 Robert C. Maysey (admitted *pro hac vice*)
21 Jerome K. Elwell (admitted *pro hac vice*)
22 2555 E. Camelback Road, Suite 800
23 Phoenix, Arizona 85016
24 Phone: (602) 264-7101/Fax: (602) 234-0419
25 rmaysey@warnerangle.com
26 jelwell@warnerangle.com

27 *Counsel for the Classes and Attorneys for*
28 *Individual and Representative Plaintiffs Cung*
29 *Le, Nathan Quarry, Jon Fitch, Luis Javier*
30 *Vazquez, Brandon Vera, and Kyle Kingsbury*

31 **LAW OFFICE OF FREDERICK S.**
32 **SCHWARTZ**

33 Frederick S. Schwartz (admitted *pro hac vice*)
34 15303 Ventura Boulevard, #1040
35 Sherman Oaks, California 91403
36 Phone: (818) 986-2407/Fax: (818) 995-4124
37 fred@fredschwartzlaw.com

38 *Attorneys for Plaintiffs*

1 **SPECTOR ROSEMAN KODROFF &**
2 **WILLIS, P.C.**
3 Jeffrey J. Corrigan (admitted *pro hac vice*)
4 William G. Caldes (admitted *pro hac vice*)
5 1818 Market Street, Suite 2500
6 Philadelphia, Pennsylvania 19103
7 Phone: (215) 496-0300/Fax: (215) 496-6611
8 jcorrigan@srkw-law.com
9 wcaldes@srkw-law.com

10 *Attorneys for Plaintiffs*

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on this 12th of April, 2017 a true and correct copy of **JOINT STIPULATION AND [PROPOSED] ORDER REGARDING AUTHENTICITY OF DOCUMENTS** was served via the United States District Court’s CM/ECF system on all parties or persons requiring notice.

By: /s/ Dannielle Fresquez
Dannielle Fresquez, an Employee of
WOLF, RIFKIN, SHAPIRO, SCHULMAN &
RABKIN, LLP