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13 Co-lead Counsel for Individual and Representative Plaintiffs
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 14 Vera, Luis Javier Vazquez, and Kyle Kingsbury
 15 [Additional Counsel Listed on Signature Page]

16 UNITED STATES DISTRICT COURT
 17 DISTRICT OF NEVADA
 18

19 Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera,
 Luis Javier Vazquez, and Kyle Kingsbury, on
 20 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.

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

**[PROPOSED] STIPULATED ORDER
 RE: EXTENSION OF DEADLINE FOR
 EXPERT REPORTS**

26
 27 Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and
 28 Kyle Kingsbury (“Plaintiffs”) and Defendant Zuffa, LLC (“Zuffa”) (Zuffa and Plaintiffs

1 collectively, “the Parties”) having met and conferred on the issues addressed herein, respectfully
2 submit the following [Proposed] Stipulated Order re: Extension of Deadline for Expert Reports:

3 WHEREAS, the Court issued the current Discovery Plan and Scheduling Order on
4 October 14, 2016 (ECF No. 311), under which the deadline for Plaintiffs’ opening expert class
5 and merits reports is May 30, 2017, the deadline for Zuffa’s opposing class and merits expert
6 reports is July 24, 2017, and the deadline for Plaintiffs’ rebuttal class and merits expert reports is
7 September 5, 2017; and,

8 WHEREAS, Plaintiffs have asserted that several motions are currently pending whose
9 outcomes could materially affect Plaintiffs’ experts’ opening reports, including:

- 10 • **Plaintiffs’ Motion to Challenge Work Product Designation**, ECF No. 282,
11 filed August 31, 2016;
- 12 • **Plaintiffs’ Motion for Extension of Discovery Deadline and Case**
13 **Management Schedule**, ECF No. 363, filed March 21, 2017;
- 14 • **Non-Party Bellator Sport Worldwide, LLC’s Motion to Quash or Modify**
15 **Subpoenas**, Case No. 2:17-cv-00849-RFB-PAL, filed in the Central District of
16 California on February 22, 2017 and transferred to the District of Nevada on
17 March 17, 2017; and,

18 WHEREAS, the Court has scheduled a hearing on Plaintiffs’ motion for extension of
19 discovery deadlines (ECF No. 363) and request for status conference (ECF No. 393) for June 1,
20 2017; and,

21 WHEREAS, the June 1 hearing would be two days after Plaintiffs’ experts’ opening
22 reports are due; and,

23 WHEREAS, Plaintiffs have asked the Court to extend the expert reports deadline by at
24 least sixty days (ECF No. 393 at 4); and,

25 WHEREAS, Zuffa has previously proposed to extend the expert reports deadline by 30
26 days or the later of the Court’s ruling on Plaintiffs’ Motion to Challenge Work Product
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1 Designation or Plaintiffs' motion to compel log of Dana White's cell phone communications
2 (ECF No. 401 at 1);

3 WHEREAS, while Plaintiffs believe that the expert and other deadlines should be
4 vacated pending further order of the Court, to avoid the uncertainties and inefficiencies
5 that would result absent an agreement, and without prejudice to Plaintiffs' ability to seek
6 additional time depending upon whether Plaintiffs are able to complete additional fact
7 discovery as agreed by the parties and/or allowed by the Court, Plaintiffs have agreed to
8 the deadlines set forth herein pending further order of the Court at the June 1 status
9 conference; and,

10 WHEREAS, the Parties, having met and conferred on May 19, 2017, have agreed to the
11 terms set forth in this Proposed Stipulated Order.

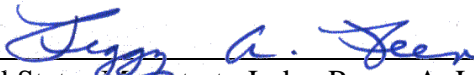
12 NOW THEREFORE, having considered the representations of the Parties, the Court
13 hereby ORDERS:

14 The deadlines for the Parties' expert reports, including Plaintiffs' opening class and
15 merits expert reports, previously set forth in the Court's Order dated October 14, 2016 (ECF No.
16 311), are hereby extended as follows:

17 Plaintiffs' Opening Expert Reports (class and 18 merits)	July 31, 2017 or 30 days following the Court's ruling on Plaintiffs' pending motions, ECF Nos. 282 and 397, whichever is later,
19 Last Day to Depose Experts Concerning 20 Opening Reports	August 31, 2017 or 60 days following the Court's ruling on Plaintiffs' pending motions, ECF Nos. 282 and 397, whichever is later
21 Opposition Expert Reports	September 29, 2017 or 90 days following the Court's ruling on Plaintiffs' pending motions, ECF Nos. 282 and 397
22 Last Day to Depose Opposition Experts	October 30, 2017 or 120 days following the Court's ruling on Plaintiffs' pending motions, ECF Nos. 282 and 397
23 Reply Expert Reports	November 13, 2017 or 134 days following the Court's ruling on Plaintiffs' pending motions, ECF Nos. 282 and 397

1 IT IS SO ORDERED.

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3 DATED: May 23, 2017


United States Magistrate Judge Peggy A. Leen

4
5 DATED: May 19, 2017

/s/ Michael Dell'Angelo

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1 DATED: May 19, 2017

/s/ Stacey Grigsby

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