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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

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

**Plaintiffs,**

**v.**

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

**Defendant.**

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

**LETTER OF REQUEST FOR  
DOCUMENTS FROM GROUP ONE  
HOLDINGS PTE. LTD.**

1                   **REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE PURSUANT TO THE**  
2                   **HAGUE CONVENTION OF 18 MARCH 1970 ON THE TAKING OF EVIDENCE ABROAD IN**  
3                   **CIVIL OR COMMERCIAL MATTERS**

4           **1.     Sender:**

5                   The Honorable Peggy A. Leen,  
6                   Magistrate Judge for the United States District Court for the District of Nevada  
7                   333 South Las Vegas Blvd.  
8                   Courtroom 3B  
9                   Las Vegas, NV 89101  
10                  Telephone: (702) 464-5400.

11           **2.     Central Authority of the Requested State:**

12                   Supreme Court of Singapore  
13                   1 Supreme Court Lane  
14                   Singapore 178879

15           **3.     Person to whom the executed request is to be returned:**

16                   Kevin E. Rayhill,  
17                   c/o Joseph Saveri Law Firm, Inc.  
18                   555 Montgomery Street  
19                   Suite 1210  
20                   San Francisco, CA 94111.  
21                   Telephone: (415) 500-6800

22           **4.     Specification of the date by which the requesting authority requires receipt of the response**  
23           **to the Letter of Request:**

24                   **Date:**

25                   July 27, 2017

26                   **Reason for urgency:**

27                   Fact discovery in this litigation closes July 31, 2017, and expert reports (for which these  
28                   documents are sought) are due August 31, 2017.

29           **IN CONFORMITY WITH ARTICLE 3 OF THE CONVENTION, THE UNDERSIGNED**  
30           **APPLICANT HAS THE HONOUR TO SUBMIT THE FOLLOWING REQUEST:**

31           **5. a    Requesting judicial authority:**

32                   United States District Court for the District of Nevada

1 **5.b To the competent authority of:**

2 The Republic of Singapore

3 **5.c Names of the case and any identifying number:**

4 *Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury,*  
5 *on behalf of themselves and all others similarly situated, Plaintiffs, v. Zuffa, LLC, d/b/a*  
6 *Ultimate Fighting Championship and UFC, Defendant, Case No. 2:15-cv-01045-RFB-PAL (D.*  
7 *Nev.)*

8 **6. Names and addresses of the parties and their representatives (including representatives in**  
9 **the requested State\*) (Article 3, b))**

10 **6.a Plaintiffs**

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

13 **Plaintiffs' Representatives:**

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

15 Joseph R. Saveri  
16 Joshua P. Davis  
17 Matthew S. Weiler  
18 Kevin E. Rayhill  
19 555 Montgomery Street, Suite 1210  
20 San Francisco, California 94111  
21 Phone: (415) 500-6800/Fax: (415) 395-9940  
22 jsaveri@saverilawfirm.com  
23 jdavis@saverilawfirm.com  
24 mweiler@saverilawfirm.com  
25 krayhill@saverilawfirm.com

26 **COHEN MILSTEIN SELLERS & TOLL, PLLC**

27 Benjamin D. Brown  
28 Richard A. Koffman  
29 Dan Silverman  
30 1100 New York Ave., N.W.,  
31 Suite 500, East Tower  
32 Washington, DC 20005  
33 Phone: (202) 408-4600/Fax: (202) 408 4699  
34 bbrown@cohenmilstein.com  
35 rkoffman@cohenmilstein.com  
36 dsilverman@cohenmilstein.com

37 **BERGER & MONTAGUE, P.C.**

38 Eric L. Cramer  
39 Michael Dell'Angelo  
40 Patrick Madden  
41 1622 Locust Street  
42 Philadelphia, PA 19103  
43 Phone: (215) 875-3000/Fax: (215) 875-4604  
44 ecramer@bm.net

1 mdellangelo@bm.net  
2 pmadden@bm.net  
3 *Co-Lead Counsel for the Classes and Attorneys for Individual and Representative Plaintiffs*  
4 *Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez, Brandon Vera, and Kyle Kingsbury*

5  
6 **6.b Defendant**

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

8 **Defendant's Representatives:**

9 BOIES, SCHILLER & FLEXNER LLP

10 William A. Isaacson  
11 Nicholas A. Widnell  
12 Stacey K. Grigsby  
13 1401 New York Avenue, NW  
14 Washington, DC 20005  
15 Tel: (202) 237-2727  
16 Fax: (202) 237-6131  
17 wisaacson@bsflp.com  
18 nwidnell@bsflp.com  
19 sgrigsby@bsflp.com

20 BOIES, SCHILLER & FLEXNER LLP

21 Richard J. Pocker (Nevada Bar No. 3568)  
22 300 South Fourth Street, Suite 800  
23 Las Vegas, NV 89101  
24 Tel: (702) 382-7300  
25 Fax: (702) 382-2755  
26 rpocker@bsflp.com

27 CAMPBELL & WILLIAMS

28 Donald J. Campbell  
J. Colby Williams  
700 South 7th Street  
Las Vegas, NV 89101  
Tel: (702) 382-5222  
Fax: (702) 382-0540  
djc@campbellandwilliams.com  
jcw@campbellandwilliams.com

*Counsel for Defendant Zuffa, LLC*

29  
30 **6.c Other Parties:**

31 **Party From Whom Documents Are Sought:**

32 Group One Holdings Pte. Ltd.  
33 Level 25  
34 One Raffles Quay  
35 North Tower  
36 Singapore, 048583

1           **Other Parties’ Representatives:**

2           Unknown.

3           **7.a Nature of the proceedings:**

4           Antitrust class action litigation pursuant to 15 U.S.C. § 2 (the Sherman Act, governing  
5           monopolization) and Federal Rule of Civil Procedure 23 (governing class actions).

6           **7.b Summary of complaint:**

7           Plaintiffs allege that defendant Zuffa, LLC (“Zuffa”) illegally acquired and maintained  
8           monopoly power in the market for promoting live Mixed Martial Arts (“MMA”) events and  
9           monopsony power in the market for acquiring the services of elite professional MMA fighters.  
10          Zuffa acquired monopoly power by acquiring its closest competitors and denying other MMA  
11          promoters access to inputs necessary to compete successfully, such as top fighters and premier  
12          venues. Plaintiffs allege that as a result of these anticompetitive actions, Zuffa has no real  
13          competitors in the market for producing live elite professional MMA bouts. The lack of true  
14          competitors contributes to Zuffa’s monopsony power in the market for purchasing the services  
15          of elite professional MMA fighters, because the fighters have few—if any—viable alternatives  
16          to signing with Zuffa. As alleged, Zuffa exploits its monopoly and monopsony power to  
17          artificially suppress compensation for elite professional MMA fighters by undercompensating  
18          them for the use of their services in MMA bouts, and by undercompensating them for the use of  
19          their name, sobriquet, voice, persona, signature, likeness and/or biographical information  
20          (referred to collectively as their “Identities”) in commercial applications. Plaintiffs consist of  
21          two classes: a class of all MMA fighters who fought under contract for Zuffa during the Class  
22          Period (December 14, 2010 to the present), and a class of all MMA fighters whose Identities  
23          were used for commercial purposes by Zuffa during the Class Period. Plaintiffs seek damages  
24          and injunctive relief for violations of United States antitrust law, specifically, Section 2 of the  
25          Sherman Act (15 U.S.C. § 2).

26          **7.c Summary of defense:**

27          Defendant Zuffa contends there are pro-competitive justifications for its actions, rendering them  
28          compliant with antitrust law. Zuffa also contends that Plaintiffs have failed to properly define  
29          the relevant product market, and that Plaintiffs have failed to show the anticompetitive effects of  
30          Zuffa’s alleged antitrust violations. Zuffa denies that it possesses monopoly power in the market  
31          for promoting live elite professional MMA events or monopsony power in the market for  
32          purchasing the services of elite professional MMA fighters, and that competition in those  
33          markets is robust.

34          **7.d Other necessary information or documents:**

35          Not applicable.

36          **8.a Evidence to be obtained or other judicial act to be performed:**

37          Group One Holdings Pte. Ltd. (“Group One”) operates an MMA promotion under the name One  
38          Championship (formerly known as One Fighting Championship or One FC). Plaintiffs seek  
39          quarterly financial statements from Group One, from January 1, 2010 to the present related to  
40          Group One’s MMA promotions. These financial statements should contain at a minimum all  
41          revenues related to the operation of One Championship or its predecessors, and all expenses  
42          related to the operation of One Championship or its predecessors, including all compensation  
43          paid to MMA fighters under contract with One Championship, its predecessors, or Group One.

1 **8.b Purpose of the evidence or judicial act sought:**

2 Group One Holdings Pte. Ltd. is not a party to the underlying litigation. However, documents  
3 produced in the underlying litigation have identified One Championship as a potential  
4 competitor to the defendant. These include statements made by representatives of Group One.  
5 Group One's quarterly financial statements are necessary to establish the relevant product  
6 market, and to show that One Championship is not a true competitor to Zuffa. Under United  
7 States antitrust law these are necessary to help prove a violation of 15 U.S.C. § 2. *See e.g.,*  
8 *Yamaha Int'l Corp. v. ABC Int'l Traders, Inc.*, No. 86-7892 RSWL, 1989 U.S. Dist. LEXIS  
9 16585, at \*13 (C.D. Cal. Aug. 11, 1989) ("Before the Rule of Reason can be applied, proper  
10 allegations regarding the relevant product market are essential. The relevant product market is  
11 the particular group of products and the geographic area in which the products compete and the  
12 challenged restraint will apply. Proper market delineation is necessary to a Rule of Reason  
13 analyses to identify such factors as competitive conditions within the industry, comparative  
14 market positions of the defendants and their competitors, and to measure the impact of the  
15 challenged restraint."). Because Zuffa and Group One have both contended that One  
16 Championship is a competitor to Zuffa, Group One's evidence is relevant and necessary for  
17 Plaintiffs to fully and fairly prosecute their claims.

18 **9. Identity and address of any person to be examined:**

19 Not applicable.

20 **10. Questions to be put to the persons to be examined or statement of the subject-matter  
21 about which they are to be examined:**

22 Not applicable.

23 **11. Documents or other property to be inspected:**

24 One Championship's per-event financial data and per-event per-fighter compensation data.

25 **12. Any requirement that the evidence be given on oath or affirmation and any special form to  
26 be used:**

27 Not applicable.

28 **13. Special methods or procedure to be followed:**

Not applicable.

**14. Request for notification of the time and place for the execution of the Request and identity  
and address of any person to be notified:**

Not applicable.

**15. Request for attendance or participation of judicial personnel of the requesting authority at  
the execution of the Letter of Request:**

Not applicable.

1 **16. Specification of privilege or duty to refuse to give evidence under the law of the State of**  
2 **origin:**

3 Not applicable.

4 **17. The fees and costs incurred which are reimbursable under the second paragraph of Article**  
5 **14 or under Article 26 of the Convention will be borne by\***

6 Not applicable.

7 **DATE OF REQUEST:** June 27, 2017

8  
9 **SIGNATURE AND SEAL OF THE REQUESTING AUTHORITY**

10  
11 

12 The Honorable Peggy A. Leen  
13 Magistrate Judge for the United States District Court  
14 District of Nevada