

ERIC L. CRAMER (*pro hac vice*)  
 BERGER MONTAGUE PC  
 1818 Market Street, Suite 3600  
 Philadelphia, PA 19103  
 Telephone: (215) 875-3000  
 Facsimile: (215) 875-4604  
 ecramer@bm.net

JOSEPH R. SAVERI (*pro hac vice*)  
 JOSEPH SAVERI LAW FIRM, LLP  
 601 California Street, Suite 1200  
 San Francisco, California 94108  
 Telephone: (415) 500-6800  
 Facsimile: (415) 395-9940  
 jsaveri@saverilawfirm.com

RICHARD A. KOFFMAN (*pro hac vice*)  
 COHEN MILSTEIN SELLERS & TOLL, PLLC  
 1100 New York Ave., N.W.,  
 Suite 500, East Tower  
 Washington, DC 20005  
 Telephone: (202) 408-4600  
 Facsimile: (202) 408 4699  
 rkoffman@cohenmilstein.com

*Counsel for the Class and Attorneys for All  
 Individual and Representative Plaintiffs*

[Additional Counsel Listed on Signature Page]

CHRISTOPHER S. YATES (*Pro hac vice*)  
 chris.yates@lw.com  
 LATHAM & WATKINS LLP  
 505 Montgomery Street, Suite 2000  
 San Francisco, CA 94111

WILLIAM A. ISAACSON (*Pro hac vice*)  
 wisaacson@paulweiss.com  
 JESSICA PHILLIPS (*Pro hac vice*)  
 jphillips@paulweiss.com  
 PAUL, WEISS, RIFKIND, WHARTON &  
 GARRISON LLP  
 2001 K Street, NW  
 Washington, DC 20006

DONALD J. CAMPBELL  
 J. COLBY WILLIAMS  
 CAMPBELL & WILLIAMS  
 710 South Seventh Street, Ste. A  
 Las Vegas, NV 89101  
 Telephone: (702) 382-5222  
 Facsimile: (702) 382-0540  
 Email: djc@cwlawlv.com  
 Email: jcw@cwlawlv.com

*Attorneys for Defendant Zuffa, LLC*

[Additional Counsel Listed on Signature  
 Page]

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, 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.

Case No.: 2:15-cv-01045-RFB-BNW

**JOINT STIPULATED [PROPOSED]  
 PRE-TRIAL SCHEDULE**

Pursuant to the Court's January 19, 2024 Order (ECF No. 961), the Parties have met and conferred and submit the below proposed pre-trial schedule. The proposed pre-trial schedule includes proposed deadlines for trial briefs and pre-trial motions, and proposed dates for pre-trial status conferences to coordinate and resolve disputes, at which the Court may conduct a pre-trial evidentiary hearing addressing exhibits and expert testimony anticipated to be used at trial. *See id.*

Date	Event
Fri., February 2	Parties exchange initial witness lists and deposition designations
Thur., February 8	Parties exchange exhibit lists
Mon., February 12	Parties exchange exhibits
Mon., February 12	Parties exchange initial lists of motions in limine each side plans to raise in advance meet and confer. (To the extent that either party may in good faith determine after February 12 that certain additional motions in limine become necessary, each side may add a certain number of additional motions in limine to its respective list after Trial Briefs are filed.)
Thur., February 15	Parties exchange proposed juror questionnaires
Fri., February 16	Parties meet and confer regarding motions in limine
Mon., February 19	Parties exchange objections to proposed juror questionnaires
Tues., February 20	Last day for parties to meet and confer regarding proposed juror questionnaire
Wed., February 21	Parties submit proposed juror questionnaire to Court
Thur., February 22	Parties exchange exhibit list objections, identification of duplicate exhibits, and rebuttal exhibit lists and exhibits
Thur., February 22	Trial Briefs due
Fri., February 23	Parties exchange deposition counters, deposition objections, and witness objections
Mon., February 26	Parties exchange revised lists of motions in limine that each side plans to raise
Mon., February 26	Parties exchange responses to objections to exhibit list, responses to identification of duplicate exhibits, and objections to rebuttal exhibits
Mon., February 26	Parties exchange proposed fact stipulations
<b>Wed., February 26</b>	Parties meet and confer regarding revised motions in limine
<b>Wed., February 26</b>	Parties exchange objections to deposition counters, responses to objections to affirmative deposition designations, and deposition counter-counters
<b>Wed., February 26</b>	Parties exchange responses to objections to rebuttal exhibits
<b>Mon., March 4 @ 9 am Pretrial Conference 9:00 a.m.</b>	

Date	Event
<b>February 28th by Noon</b>	Witness lists, joint and disputed exhibit lists, deposition designations, and courtesy flash drives due to Court
<b>February 28th</b>	Motions in limine <b>due by Noon</b>
Thur., March 7	Parties exchange responses to proposed fact stipulations
Tues., March 12	Parties exchange proposed jury instructions and verdict form and voir dire
<b>March 13</b>	Oppositions to motions in limine due
<b>Mon., April 1</b>	Parties submit joint pre-trial order per Local Rule 16-3(b)
Tues., March 19	Parties exchange stipulation for addressing exhibit and deposition designations issues at trial, including proposals for exchange of demonstratives and schedule of witnesses to be called
<i>Thur., March 21</i>	<i>Potential date for hearing or status conference</i>
<i>Mon., March 25</i>	<i>Potential date for hearing or status conference</i>
<i>Thur., March 28</i>	<i>Potential date for hearing or status conference</i>
Mon., April 1	Combined proposed jury instructions, verdict form, and voir dire submitted to the Court
Fri., April 5	1006 summaries due. Parties agree to make a good-faith effort to disclose all 1006 summaries by this date. With good cause shown, Parties may disclose 1006 summaries after this date if the late disclosure was due in whole or material part to information becoming evident only after the disclosure deadline, provided such summaries are disclosed ten (10) calendar days prior to use at trial. Parties reserve their rights to object to a 1006 summary prior to its use at trial.
<b>April 5th</b>	Final witness lists, exhibit lists, and courtesy flash drives due to the Court. Exhibits to the Clerk also due this date, as stated below.
<b>Tues., April 9 @ 9:00 a.m</b>	<b>Calendar Call</b>
<b>Mon., April 15</b>	Trial begins

The proposed scheduling order is adopted by this Court with the changes noted in red. Parties are advised Exhibits must be marked and submitted electronically in accordance with JERS instructions that will be attached to this order.

Dated the 5th day of February, 2024

IT IS SO ORDERED:



RICHARD F. BOULWARE, II  
United States District Judge

1 Dated: January 26, 2024

Respectfully submitted,

2 By: /s/ Christopher K.L. Young

By: /s/ Christopher S. Yates

3 Joseph R. Saveri (pro hac vice)  
4 Kevin E. Rayhill (pro hac vice)  
5 Christopher K. L. Young (pro hac vice)  
6 Itak Moradi (pro hac vice)  
7 JOSEPH SAVERI LAW FIRM, LLP  
8 601 California St., Suite 1000  
9 San Francisco, CA 94108  
10 Telephone: +1 (415) 500-6800  
11 Facsimile: +1 (415) 395-9940  
12 Email: jsaveri@saverilawfirm.com  
13 Email: krayhill@saverilawfirm.com  
14 Email: cyoung@saverilawfirm.com  
15 Email: imoradi@saverilawfirm.com

16 Eric L. Cramer (admitted pro hac vice)  
17 Michael Dell'Angelo (admitted pro hac vice)  
18 Patrick F. Madden (admitted pro hac vice)  
19 Najah Jacobs (admitted pro hac vice)  
20 BERGER MONTAGUE PC  
21 1818 Market St., Suite 3600  
22 Philadelphia, PA 19103  
23 Telephone: +1 (215) 875-3000  
24 Email: ecramer@bm.net  
25 Email: mdellangelo@bm.net  
26 Email: pmadden@bm.net  
27 Email: njacobs@bm.net

28 Joshua P. Davis (admitted *pro hac vice*)  
BERGER MONTAGUE PC  
505 Montgomery Street, Suite 625  
San Francisco, CA 94111  
Telephone: +1 (415) 906-0684  
Email: jdavis@bm.net

WILLIAM A. ISAACSON (*Pro hac vice*)  
wisaacson@paulweiss.com  
JESSICA PHILLIPS (*Pro hac vice*)  
jphillips@paulweiss.com  
PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP  
2001 K Street, NW  
Washington, DC 20006

BRETTE M. TANNENBAUM (*Pro hac vice*)  
btannenbaum@paulweiss.com  
YOTAM BARKAI (*Pro hac vice*)  
ybarkai@paulweiss.com  
PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP  
1285 Avenue of the Americas  
New York, NY 10019

CHRISTOPHER S. YATES (*Pro hac vice*)  
chris.yates@lw.com  
LATHAM & WATKINS LLP  
505 Montgomery Street, Suite 2000  
San Francisco, CA 94111

SEAN M. BERKOWITZ (*Pro hac vice*)  
sean.berkowitz@lw.com  
LATHAM & WATKINS LLP  
330 North Wabash Ave, Suite 2800  
Chicago, IL 60611

LAURA WASHINGTON (*Pro hac vice*)  
laura.washington@lw.com  
LATHAM & WATKINS LLP  
10250 Constellation Blvd, Suite 1100  
Los Angeles, CA 90067

DAVID L. JOHNSON (*Pro hac vice*)  
david.johnson@lw.com  
LATHAM & WATKINS LLP  
555 Eleventh Street NW, Suite 1000  
Washington, D.C. 20004

1 Richard A. Koffman (*pro hac vice*)  
Benjamin Brown (*pro hac vice*)  
2 Daniel H. Silverman (*pro hac vice*)  
COHEN MILSTEIN SELLERS & TOLL, PLLC  
3 1100 New York Ave., N.W., Suite 500 East, Tower  
4 Washington, DC 20005  
Telephone: +1 (202) 408-4600  
5 Facsimile: +1 (202) 408-4699  
Email: rkoffman@cohenmilstein.com  
6 Email: bbrown@cohenmilstein.com  
7 Email: dsilverman@cohenmilstein.com

8 *Co-Lead Counsel for the Class and Attorneys for*  
9 *Individual and Representative Plaintiffs*

10 Don Springmeyer (Bar No. 1021)  
KEMP JONES, LLP  
3800 Howard Hughes Parkway, 17th Floor  
11 Las Vegas, Nevada 89169  
Telephone: + 1 (702) 385-6000  
12 Facsimile: + 1 (702) 385-6001  
Email: dspringmeyer@kempjones.com  
13

14 *Liaison Counsel for the Class and Attorneys for*  
15 *Individual and Representative Plaintiffs*

16 Robert C. Maysey (*pro hac vice*)  
Jerome K. Elwell (*pro hac vice*)  
WARNER ANGLE HALLAM JACKSON &  
17 FORMANEK PLC  
2555 E. Camelback Road, Suite 800  
18 Phoenix, AZ 85016  
Telephone: +1 (602) 264-7101  
19 Facsimile: +1 (602) 234-0419  
Email: rmaysey@warnerangle.com  
20 Email: jelwell@warnerangle.com

21 Crane Pomerantz (Bar No. 14103)  
CLARK HILL PLC  
1700 S. Pavilion Center Drive  
22 Suite 500  
Las Vegas, NV 89135  
23 Telephone: +1 (702) 697-7545  
24 Email: cpomerantz@clarkhill.com

25 *Counsel for the Class and Attorneys for Individual*  
26 *and Representative Plaintiffs.*  
27  
28

DONALD J. CAMPBELL (No. 1216)  
djc@campbellandwilliams.com  
J. COLBY WILLIAMS (No. 5549)  
jcw@campbellandwilliams.com  
CAMPBELL & WILLIAMS  
700 South 7th Street  
Las Vegas, Nevada 89101

*Attorneys for Defendant Zuffa, LLC*

- 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

/s/ Christopher K.L. Young  
Christopher K.L. Young