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10 *Attorneys for Plaintiff Mark Hunt*

11 **UNITED STATES DISTRICT COURT**  
 12 **DISTRICT OF NEVADA**

13 MARK HUNT, an individual,  
 14 Plaintiff,  
 15 v.

16 ZUFFA, LLC d/b/a ULTIMATE FIGHTING  
 17 CHAMPIONSHIP, a Nevada limited liability  
 company; BROCK LESNAR, an individual;  
 18 DANA WHITE, an individual, and DOES 1-50,  
 inclusive,  
 19 Defendants.

Case No.: 2:17-cv-00085-JAD-VCF

**STIPULATION TO EXTEND DISCOVERY  
 DEADLINES**

**FIRST REQUEST<sup>1</sup>**

20 Pursuant to LR IA 6-1, LR IA 6-2, LR II 7-1, and LR II 26-3, Plaintiff Mark Hunt  
 21 (“Plaintiff”), by and through his undersigned counsel, Defendant Brock Lesnar (“Lesnar”), by and  
 22 through his undersigned counsel, and Defendants Zuffa, LLC (“UFC”) and Dana White (“White”),  
 23 by and through their undersigned counsel, hereby stipulate, contingent upon this Court’s approval  
 24 to extend the remaining discovery deadlines set forth in the Court’s Scheduling Order (ECF No.  
 25 215). This is the parties’ first request to extend the subject deadlines.

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 28 <sup>1</sup> This is the parties’ first request for an extension of the deadlines set forth in the Court’s  
 Scheduling Order entered post-remand (ECF No. 215).

1           **A. The Discovery Completed to Date:**

2           In addition to the voluminous written discovery that the parties exchanged and responded  
3 to prior to the appeal, the parties have completed the following further discovery post-remand:

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Date	Discovery Event
3/18/2022	UFC served a subpoena for documents to non-party USADA
3/23/2022	Lesnar served Interrogatories, Requests for Production, and Requests for Admission on Plaintiff
5/20/2022	Plaintiff responded to Lesnar's Interrogatories, Requests for Production, and Requests for Admission
7/6/2022	Plaintiff served a subpoena for documents to non-party USADA
7/15/2022	The parties disclosed their Initial Designation of Expert Witnesses
8/4/2022	Plaintiff served Requests for Production to UFC (responses not yet due)
8/15/2022	Plaintiff disclosed his Initial Expert Reports
8/16/2022	UFC noticed Plaintiff's deposition (September 16, 2022)
8/18/2022	Parties confirmed deposition dates for White and non-party Jeff Novitzky (10/27-28, Notices forthcoming)

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12           In addition to the above events, the parties have engaged at length regarding counsel's and  
13 the parties' availability for depositions, as well as the depositions of certain additional non-parties.  
14 Given various scheduling conflicts amongst counsel and the parties (and non-parties), as well as  
15 the parties' ongoing disagreement regarding the propriety of certain non-party depositions, the  
16 parties anticipate the need for an extension of the discovery deadline to accommodate the  
17 remaining depositions that remain outstanding. This includes the depositions of Defendant White  
18 and non-party Jeff Novitzsky, which depositions are already scheduled to take place after the  
19 current close of discovery by necessity of the parties' and counsel's respective availability.

20           **B. The Discovery that Remains to be Completed:**

21           Discovery that remains to be completed includes the depositions of each of the parties and  
22 certain non-party percipient witnesses. Additional written discovery may also be appropriate.

23           **C. The Reasons Why Specified Discovery Has Yet to Be Completed:**

24           As stated above, the parties have had difficulty identifying dates, times, and locations that  
25 work for all of the parties (and non-parties) and their counsel to take depositions in this matter.  
26 This difficulty is exacerbated by Plaintiff's residence in Australia, and by each of the parties'  
27

1 uniquely busy travel and work schedules. However, the parties have already begun to identify  
2 dates that are workable and issued Notices of Deposition accordingly. As such, the parties are  
3 requesting an extension of the discovery deadline sufficient to accommodate the various  
4 depositions sought by the parties.  
5

6 **D. A Proposed Schedule for Completing All Remaining Discovery:**

7 By this stipulation, the parties agree and request a sixty-day extension of the following  
8 deadlines (adjusted as necessary for holidays or weekends) set forth in the Scheduling Order (ECF  
9 No. 215):

<b>Discovery Event</b>	<b>Current Deadline</b>	<b>Extended Deadline</b>
Amending Pleadings / Adding Parties	July 18, 2022	<b>No change</b>
Discovery Completion	October 14, 2022	<b>December 13, 2022</b>
Initial Disclosure of Experts	July 15, 2022	<b>No change</b>
Initial Disclosure of Expert Reports	August 15, 2022	<b>No change</b>
Rebuttal Expert Opinions	September 14, 2022	<b>No change</b>
Dispositive Motions	November 14, 2022	<b>January 13, 2023</b>
Pre-Trial Order	December 14, 2022	<b>February 13, 2023</b>

15 **E. Good Cause**

If dispositive motions are filed, the deadline  
for filing the joint pretrial order will be suspended until 30 days after  
decision on the dispositive motions or further court order.

16 Pursuant to LR IA 6-1(a) and LR II 26-3, good cause exists to extend the deadlines under  
17 the Scheduling Order, as the parties have been diligently cooperating to identify dates and locations  
18 for the various depositions that must be taken in this matter. Despite various scheduling conflicts  
19 amongst counsel and the parties alike, the parties have begun to select firm dates for certain  
20 depositions and request the instant extension to accommodate those dates.  
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1                   **IT IS SO AGREED AND STIPULATED.**

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3   Respectfully submitted this 24th day of August 2022.

4   **HOLLEY DRIGGS**

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37                   **IT IS SO ORDERED:**

38                   

39                   ~~UNITED STATES DISTRICT JUDGE /~~  
40                   UNITED STATES MAGISTRATE  
41                   JUDGE

42                   DATED: 8-26-2022  
43                   \_\_\_\_\_

1 **CERTIFICATE OF SERVICE**

2 Pursuant to Federal Rule of Civil Procedure 5 and the Court’s Local Rules, I hereby  
3 certify that on August 24th, 2022, a copy of the foregoing document titled **STIPULATION**  
4 **TO EXTEND DISCOVERY DEADLINES (FIRST REQUEST)** was efiled/emailed to  
5 all parties and their counsel.

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29 */s/ Sandy Sell*  
30 \_\_\_\_\_  
31 An employee of HOLLEY DRIGGS