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17 Attorneys for Plaintiff  
 18 MARK HUNT

19 **UNITED STATES DISTRICT COURT**  
 20 **DISTRICT OF NEVADA**

21 MARK HUNT, an individual,  
 22  
 23 Plaintiff,  
 24  
 25 v.  
 26 ZUFFA, LLC d/b/a ULTIMATE  
 27 FIGHTING CHAMPIONSHIP, a  
 28 Nevada limited liability company;  
 BROCK LESNAR, an individual;  
 DANA WHITE, an individual; and  
 DOES 1-50, inclusive,  
 Defendants.

**Case No.: 2:17-cv-00085-JAD-CWH**

**STIPULATION AND [PROPOSED]  
 ORDER RE: EXTENSION OF TIME  
 TO FILE OPPOSITION TO MOTION  
 TO STAY  
 [FIRST REQUEST]**

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STIPULATION AND [PROPOSED] ORDER RE:  
 EXTENSION TO FILE OPPOSITION TO MOTION TO STAY DISCOVERY  
 [FIRST REQUEST]  
 Case No.: 2:17-cv-00085-JAD-CWH

1 Pursuant to Local Rules IA 6-1, 6-2, and LR 7-1, Plaintiff MARK HUNT (“Hunt”),  
2 and Defendants ZUFFA, LLC d/b/a ULTIMATE FIGHTING CHAMPIONSHIP  
3 (“Zuffa”), DANA WHITE (“White”) and BROCK LESNAR (“Lesnar”) hereby stipulate  
4 to extend the deadline for Hunt to file his Opposition to Zuffa and White’s Motion to Stay  
5 Discovery [Doc. 47] until May 22, 2017. This is the first such stipulation seeking this  
6 relief. This stipulation is based on the following:

7 Defendants’ respective Motions to Dismiss pursuant to Fed. R. Civ. P. 12(b)(6)  
8 [Docs. 11 and 30] and are set to be heard on May 15, 2017 [See, Docs. 13 and 46]. Zuffa  
9 and White filed a Motion to Stay Discovery on April 20, 2017 [Doc. 47]. Lesnar joined in  
10 the Motion to Stay Discovery on April 26, 2017 [Doc. 52].

11 Counsel for Hunt and counsel for Zuffa and White met and conferred regarding a  
12 potential stipulation that may dispose of or limit the scope of the Motion to Stay  
13 Discovery. Their meeting and conferring occurred via written correspondence on April  
14 25 and April 27, 2017, and via telephone discussion on May 1, 2017. Counsel for Hunt  
15 and counsel for Zuffa and White agreed that they would be in a better position to discuss a  
16 potential stipulation that may dispose of or limit the scope of the Motion to Stay  
17 Discovery following the May 15, 2017 hearing on the Motions to Dismiss. However,  
18 pursuant to LR 7-2(b), Hunt’s opposition to the Motion to Stay Discovery is due by May  
19 4, 2017. Therefore, the parties are requesting an extension of time for Hunt to file his  
20 opposition to Zuffa and White’s Motion to Dismiss (joined by Lesnar) until May 22,  
21 2017, one week following the hearing on Defendants’ Motions to Dismiss.

22 Good cause exists for this Court to extend the date for Hunt to file his opposition to  
23 the Motion to Stay Discovery. No hearing date has been given for the Motion to Stay  
24 Discovery. Moreover, the parties agree that they are more likely to have productive  
25 discussions regarding a potential stipulation that may eliminate the need for or reduce the  
26 scope of the Motion to Stay following the May 15, 2017 hearing on Defendants’ Motion  
27 to Dismiss.

28 Based on the foregoing, the parties hereby stipulate and request that the Court issue

1 an Order extending the deadline for Hunt to file an opposition to Zuffa and White's  
2 Motion to Stay Discovery until May 22, 2017.

3  
4 DATED: May 2, 2017

HIGGS FLETCHER & MACK LLP

5 By: /s/ Christina M. Denning  
6 CHRISTINA M. DENNING, ESQ.  
7 SCOTT J. INGOLD, ESQ.  
8 Attorneys for Plaintiff  
9 MARK HUNT

9 DATED: May 2, 2017

CAMPBELL & WILLIAMS

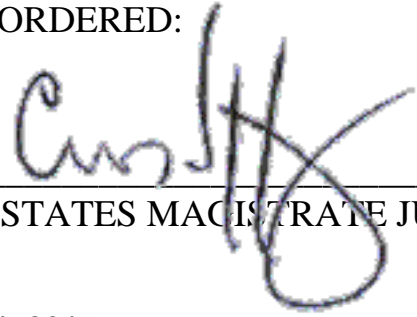
10 By: /s/ J. Colby Williams  
11 J. COLBY WILLIAMS, ESQ.  
12 PHILIP R. ERWIN, ESQ.  
13 Attorneys for Defendants ZUFFA, LLC  
14 d/b/a ULTIMATE FIGHTING  
15 CHAMPIONSHIP and DANA WHITE

14 DATED: May 2, 2017

CHRISTIANSEN LAW OFFICES

16 By: /s/ Kendelee L. Works  
17 PETER S. CHRISTIANSEN, ESQ.  
18 KENDELEE L. WORKS, ESQ.  
19 Attorneys for Defendants BROCK  
20 LESNAR

21 IT IS SO ORDERED:

22  
23 BY:   
24 UNITED STATES MAGISTRATE JUDGE

25 DATED: May 4, 2017

1 **CERTIFICATE OF SERVICE**

2 Pursuant to Federal Rule of Civil Procedure 5 and the Court's Local Rules, the  
3 undersigned hereby certifies that on this day, May 2, 2017, a copy of the foregoing  
4 document entitled **STIPULATION AND [PROPOSED] ORDER RE: EXTENSION**  
5 **OF TIME TO FILE OPPOSITION TO MOTION TO STAY**  
6 **[FIRST REQUEST]** was filed and served through the Court's electronic filing system  
7 (CM/ECF) upon all registered parties and their counsel.

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11 Barbara Lodovice  
12 An employee of Higgs Fletcher & Mack LLP  
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