

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

**ZUFFA, LLC, d/b/a THE ULTIMATE
FIGHTING CHAMPIONSHIP (UFC),**

Plaintiff,

-against-

AFFIDAVIT

Civil Action No. 3:10-CV-02278-M

**THOMAS JOSEPH CATHCART and MANUEL P.
OLIVAREZ**, Individually, and as officers, directors,
shareholders, and/or principals of **OLICAT GROUP
LLC, d/b/a HOOLEY'S TAVERN AND GRILL,**
a/k/a **HOOLEY'S TAVERN,**

and

**OLICAT GROUP LLC, d/b/a HOOLEY'S TAVERN
AND GRILL, a/k/a HOOLEY'S TAVERN,**

Defendants.

COMMONWEALTH OF PENNSYLVANIA)

)ss.:

COUNTY OF BUCKS

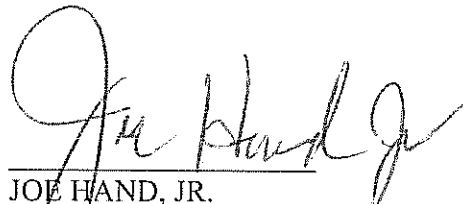
)

JOE HAND, JR., being duly sworn, deposes and states the following:

1. I am President of Joe Hand Promotions, Inc., the exclusive commercial distributor for Plaintiff, Zuffa, LLC d/b/a The Ultimate Fighting Championship (UFC).
2. I make this affidavit in support of Plaintiff's request to recover statutory damages, including litigation fees, in the within request for judgment by default.
3. Joe Hand Promotions, Inc., is the exclusive commercial distributor in the United States of the UFC #114 broadcast, which was held on May 29, 2010.
4. Joe Hand Promotions, Inc., maintains a list of authorized and legal locations who paid the required fee to exhibit the UFC #114 broadcast, which was held on May 29, 2010. (The list for the State of Texas is attached to Plaintiff's Affidavit as Exhibit "B.")

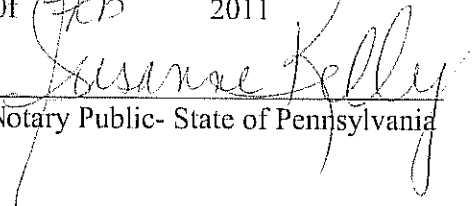
5. Defendants, MANUEL P. OLIVAREZ, Individually, and as officer, director, shareholder, and/or principal of OLICAT GROUP LLC, d/b/a HOOLEY'S TAVERN AND GRILL, a/k/a HOOLEY'S TAVERN, and OLICAT GROUP LLC, d/b/a HOOLEY'S TAVERN AND GRILL, a/k/a HOOLEY'S TAVERN, did not purchase the rights to commercially exhibit the broadcast from Joe Hand Promotions, Inc., and are not on the legal list attached hereto.

Dated: 2/25 2011



JOE HAND, JR.
President, Joe Hand Promotions, Inc.

Sworn to before me on this 25 day
Of Feb 2011



Notary Public- State of Pennsylvania

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
SUSANNE KELLY, Notary Public
Lower Southampton Twp., Bucks County
My Commission Expires October 9, 2013