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December 17, 2014

**Via Facsimile and Federal Express**

Dana White  
ZUFFA, LLC  
2960 W. Sahara Avenue, Suite 100  
Las Vegas, Nevada 89102

Re: *Cung Le, Nathan Quarry and Jon Fitch, et al. v. Zuffa, LLC*,  
Case No. 5:14-cv-05484 (N.D. Cal.)

Dear Mr. White:

We write on behalf of Plaintiffs Cung Le, Nathan Quarry and Jon Fitch (“Plaintiffs”) in the above-captioned class action.

If you have retained outside counsel with reference to this matter, please let us know.

You are undoubtedly aware that on December 16, 2014, Plaintiffs filed an antitrust class action lawsuit against Zuffa, LLC, dba Ultimate Fighting Championship (“Zuffa”) in the United States District Court for the Northern District of California in San Jose. A courtesy copy of Plaintiffs’ Complaint is attached. Zuffa will be formally served through its agent for service of process in the near term.

As you may be aware, litigants have a duty to preserve evidence which they know, or should know, is relevant to possible claims or causes of actions in pending litigation to which they are parties. This duty extends to evidence that appears reasonably calculated to lead to the discovery of admissible evidence, even if it is not necessarily admissible at trial itself.

We write to notify Zuffa of its duty to preserve all electronically stored information (“ESI”), as well as copies and backups of such ESI, as defined by Rule 34 of the Federal Rules of Civil Procedure, along with any paper files which Zuffa and its officers, directors, members, employees, agents, affiliates, and any other such individuals involved in

the business of Zuffa and the UFC maintain that pertain to or contain information relevant to the above-referenced action. ESI includes, but is not limited to email, email attachments, word processing documents, spreadsheet documents, presentations, text messages, social media data and postings, copies of web sites and changes to web sites, voice mail messages, audio files, video files, and photograph files. Further, ESI may be stored or contained in a wide variety of devices and items, such as computers, video game consoles, cellular telephones, smartphones, memory cards, printers, copy machines, answering machines, and digital music players.

During discovery, Plaintiffs will be seeking any and all ESI in Zuffa's custody and control that is relevant to this action, including without limitation emails, text messages, social media data and postings, copies of websites and changes to websites, and any other information contained on the computer systems and any electronic storage systems of Zuffa and its officers, directors, members, employees, agents, affiliates, and any other such individuals involved in the business of Zuffa and the UFC. Plaintiffs consider this ESI and paper files to be valuable and irreplaceable sources of discoverable information in this matter.

In effect, Plaintiffs hereby trigger what is commonly known as a "litigation hold." Accordingly, any of Zuffa's document retention policies concerning the preservation and spoliation of ESI and paper records should be amended so that all relevant evidence is preserved. After a litigant is put on notice that the duty to preserve evidence has been triggered, courts take very seriously the destruction of subject evidence. Penalties can range from sanctions to, in especially severe cases, adverse factual inferences, adverse jury instructions and/or the entry of default judgment.

Plaintiffs hereby place Zuffa on notice to preserve all ESI and paper records regarding Mr. Le, Mr. Quarry, Mr. Fitch or any members of the Bout Class and/or the Identity Class, as those classes are defined in Plaintiffs' complaint. Additionally, Zuffa must preserve ESI and paper documents regarding the persons or acts set forth in the complaint. Plaintiffs also place Zuffa on notice not to allow the deletion or editing of any electronic communications or social media, such as emails, text messages or social media data and postings, relating to Mr. Le, Mr. Quarry, Mr. Finch or the acts set forth in the complaint.

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We are confident that Zuffa already has taken steps to preserve such ESI and paper records due to its obligation to preserve relevant evidence. Accordingly, Zuffa should not have implemented any procedures or practices to alter any active, deleted or fragmented ESI information or data. Moreover, no ESI should have been disposed of or destroyed. If any such ESI has been edited, disposed of or destroyed, please advise us immediately.

We further trust that Zuffa will continue to preserve such ESI and paper files throughout the course of this litigation. We are available at your convenience to discuss these matters.

Sincerely,

Joseph R. Saveri

cc: Benjamin Brown  
Eric Cramer  
Robert Maysey