

1 Plaintiffs Cung Le, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury
2 respectfully move this Court for an Order directing the distribution of the Net *Le v. Zuffa* Settlement
3 Fund¹ pursuant to the Court-approved Plan of Allocation (ECF No. 1045-5 at 1 & ¶¶ 4-5, 9) and
4 consistent with the *pro rata* allocations as determined by the Court-approved Claims Administrator,
5 Angeion Group, LLC (“Angeion”), in consultation with Co-Lead Class Counsel² and Plaintiffs’
6 economic experts, EconOne Research, Inc. (“EconOne”). Specifically, Co-Lead Counsel seek an Order
7 of the Court:

8 1) Approving the allocation determinations made by Angeion, with the assistance of Co-
9 Lead Class Counsel and EconOne, based on the Court-approved Plan of Allocation (ECF No. 1045-5),
10 as set forth in the Declaration of Bach-Viet Nguyen of Angeion Group LLC re the Distribution of the
11 Net *Le v. Zuffa* Settlement Fund, dated September 19, 2025 (the “Distribution Decl.”), which is
12 attached as Exhibit 1 hereto;

13 2) Directing that one claim that was submitted after the deadline³ shall be included in the
14 distribution of the Net *Le v. Zuffa* Settlement Fund as a Late Approved Claim;

15 3) Directing Angeion to conduct the distribution of the Net *Le v. Zuffa* Settlement Fund as
16 set forth in Exhibit A to the Distribution Decl.;

17 4) Authorizing Angeion to contact Claimants to encourage them to cash their checks and
18 directing that Angeion may reissue a check for good cause shown;

19 5) Approving the payment of up to \$204,886 from the *Le v. Zuffa* Settlement Fund for
20 future estimated expenses (*e.g.*, for mailing checks, issuing wires, and other administrative costs) for
21 the distribution of the Net *Le v. Zuffa* Settlement Fund;

22
23 ¹ Unless expressly defined herein, all capitalized terms have the meaning as defined in the Settlement
24 Agreement, dated September 26, 2024 (ECF No. 1045-4).

25 ² Co-Lead Class Counsel refers to Berger Montague PC, Cohen Milstein Sellers & Toll PLLC, and the
26 Joseph Saveri Law Firm LLP. The term “Class Counsel” refers to Co-Lead Class Counsel and the
27 following firms: Wolf, Rifkin, Shapiro, Schulman & Rabkin, LLP; Kemp Jones, LLP; Warner Angle
Hallam Jackson & Formanek PLC; Clark Hill PLC; The Radice Law Firm; and Spector Roseman
Kodroff & Willis.

28 ³ See Declaration of Bach-Viet Nguyen of Angeion Group LLC re Final Report to the Court Regarding
Distribution of the Net Settlement Fund - Corrected, at 2 n.1 (September 2, 2025). ECF No. 1069.

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CERTIFICATE OF SERVICE

I hereby certify that on September 19, 2025, a true and correct copy of Plaintiffs’ Motion for Disbursement of the Net *Le v. Zuffa* Settlement Fund was served via the U.S. District Court of Nevada’s ECF System to all counsel of record who have enrolled in the ECF System.

/s/ Eric L. Cramer
Eric L. Cramer

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1 Plaintiffs Cung Le, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury
 2 respectfully this memorandum in support of their motion to distribute the Net *Le v. Zuffa* Settlement
 3 Fund¹ pursuant to the Court-approved Plan of Allocation (at 1 & ¶¶ 4-5, 9).

4 I. INTRODUCTION

5 On March 3, 2025, the Court granted final approval of the Settlement (“Final Approval Order”)
 6 resolving all claims against the Defendant in exchange for \$375 million (which amount constitutes the
 7 *Le v. Zuffa* Settlement Fund). ECF No. 1064. As part of the Final Approval Order, the Court also
 8 approved the Plan of Allocation and a schedule for Class Members² to submit a claim form. *See id.* ¶¶
 9 12-14. Co-Lead Class Counsel³ then worked with the Court-approved Claims Administrator, Angeion
 10 Group, LLC (“Angeion”), and Plaintiffs’ economic experts, EconOne Research, Inc. (“EconOne”), to
 11 issue claim forms to 1,121 Class Members, which forms were “prepopulated” with data needed for the
 12 Class Members to submit their claims. *See* Final Report ¶ 5.

13 The response by the Class was remarkable: 1,088 Class Members submitted valid claims. Final
 14 Report ¶ 7.⁴ This represents a response of rate of just over 97%, which is the highest claims rate for any
 15 antitrust class action that Ageion has administered. *Id.* ¶ 13. Moreover, following Angeion’s review of
 16 the claims and all responses to deficiency notices sent to Claimants, Angeion determined that all the
 17

18 ¹ Unless expressly defined herein, all capitalized terms have the meaning as defined in the Settlement
 19 Agreement, dated September 26, 2024 (ECF No. 1045-4), the Plan of Allocation (ECF No. 1045-5),
 20 and the Declaration of Bach-Viet Nguyen of Angeion Group LLC re Final Report to the Court
 Regarding Distribution of the Net Settlement Fund – Corrected (“Final Report”), ¶ 5 (September 2,
 2025) (ECF No. 1069).

21 ² The Class is defined to include all persons who competed in one or more live professional UFC
 22 promoted MMA bouts taking place or broadcast in the U.S. from December 16, 2010 to June 30, 2017
 23 (the “Class Period”), but excludes all persons who are not residents or citizens of the U.S. unless the
 UFC paid such persons for competing in a bout fought in the U.S. *See* ECF No. 839, at 79.

24 ³ Co-Lead Class Counsel refers to Berger Montague PC, Cohen Milstein Sellers & Toll PLLC, and the
 25 Joseph Saveri Law Firm LLP. The term “Class Counsel” refers to Co-Lead Class Counsel and the
 26 following firms: Wolf, Rifkin, Shapiro, Schulman & Rabkin, LLP; Kemp Jones, LLP; Warner Angle
 Hallam Jackson & Formanek PLC; Clark Hill PLC; The Radice Law Firm; and Spector Roseman
 Kodroff & Willis.

27 ⁴ This total includes one claim that was submitted after the deadline that Co-Lead Class Counsel, after
 28 consulting with Angeion, recommend be included in the distribution as a Late Approved Claim. *See*
 Final Report at 2 n.1.

1 submitted claims were valid. *Id.*

2 With the review of the claims completed, Co-Lead Class Counsel respectfully request that the
 3 Court direct distribution of the Net *Le v. Zuffa* Settlement Fund to the 1,088 Claimants pursuant to the
 4 Plan of Allocation. As described in more detail herein, the Net *Le v. Zuffa* Settlement Fund totals
 5 \$250,852,427.06. This amount is derived from the \$375 million *Le v. Zuffa* Settlement Fund plus
 6 interest earned through September 30, 2025 of \$7,503,208.70, less the following: (i) Court-approved
 7 attorneys' fees (with interest) and litigation expenses in the collective amount of \$126,750,096.57;⁵ (ii)
 8 service awards for the five Class Representatives and Plaintiff Quarry's Settlement as approved by the
 9 Court in the total amount of \$1,500,000; (iii) tax payments made in the amount of \$2,390,950; (iv)
 10 future estimated tax payments in the amount of \$250,000; (v) Angeion's notice and administration
 11 expenses through July 2025 in the amount of \$165,543.07; (vi) a reserve in the amount of \$200,336 to
 12 cover Angeion's anticipated administration fees for the distribution and related settlement
 13 administration; (vii) EconOne's professional fees associated with the Settlement in the amount of
 14 \$43,856 (which includes anticipated fees going forward for the distribution); and (viii) a reserve in the
 15 amount of \$350,000 to address any unexpected expenses or issues associated with the distributions to
 16 the Claimants. *See* Declaration of Bach-Viet Nguyen of Angeion Group LLC re the Distribution of the
 17 Net *Le v. Zuffa* Settlement Fund ("Distribution Decl."), ¶ 6 (attached as Exhibit 1 to the motion).

18 If the Court approves the proposed distribution of the Net *Le v. Zuffa* Settlement fund, the
 19 average distribution payment to Claimants will be \$230,562.89; the median distribution payment is
 20 \$85,863.57; the high payment is \$10,313,690.73; and the lowest distribution payment is \$16,106.36.
 21 *See* Distribution Decl. ¶ 8. To the extent that funds remain at the conclusion of this distribution, Co-
 22 Lead Class Counsel will seek Court approval for a second distribution, or if that is economically
 23 impracticable, then Co-Lead Class Counsel will make an application to the Court for a *cy pres*
 24 distribution to an appropriate charitable organization. *See* Plan of Allocation ¶ 16.

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 28 ⁵ The Court awarded attorneys' fees of \$115.2 million, plus accrued interest, and \$9,572,685.17 in
 litigation expenses. *See* ECF No. 1065 ¶¶ 7-8.

II. SUMMARY OF THE CLAIM SUBMISSION AND AUDIT PROCESS

On May 2, 2025, Angeion mailed prepopulated claims forms to 1,121 Class Members for whom Angeion had valid and current address information. *See* Final Report ¶ 5. Included in each claim form was the recipient Class Member’s total compensation (“Event Compensation”) earned during the Class Period (December 16, 2010 through June 30, 2017) and the total number of bouts (“Number of Bouts Fought”) the Class Member fought during the Class Period, which information was obtained from records provided by Defendant. *See* Claim Form, at Step 1 (attached at Exhibit A to the Final Report, ECF No. 1068-2). The form provided the following information to Class Members: the means by which they could (a) dispute the total Event Compensation and/or Number of Bouts Fought information if any Class Member believed this data was incorrect, (b) update their contact information, (c) submit any necessary tax forms, (d) verify their claims, and (e) submit claims by the claims deadline of June 16, 2025. *See id.* at Steps 2-6. The claim form also indicated that Class Members could submit their claim forms (and tax forms) using the Settlement website (accessed with the Class Member’s unique login information), by snail mail, or by email. *See id.* at Steps 4 & 6.

Angeion received 1,088 claim forms. *See* Final Report ¶ 7 & n.1. To encourage Class Member participation, Co-Lead Class Counsel expended substantial effort to locate, contact, and assist Class Members in submitting claim forms. *See id.* ¶ 6. Co-Lead Class Counsel called, emailed, and used social media to contact Class Members to encourage them to file claims and to locate those Class Members who had not yet submitted their claims. *Id.* Co-Lead Class Counsel assisted Class Members with completing their claim forms and provided instructions on how to submit the necessary tax forms. They also held multiple Q&A sessions (that were presented via video conference in multiple foreign languages), participated in public interviews, submitted social media posts, and updated websites to educate Class Members about the claims process. *Id.* As noted above, the participation by the Class was extraordinary with just over 97% of Class Members submitting claims.

Angeion assigned each claim form that was submitted a unique claim number, compiled the claim information, and any supplied supporting documentation, into Angeion’s claims database. *Id.* ¶ 7. Angeion thoroughly reviewed and analyzed the claims to verify information, identify duplicate or incomplete claim forms, check for fraud, and otherwise assess whether any of the claims were

1 deficient. *Id.* ¶ 8. Angeion determined that 1,057 claims accepted the prepopulated information on
2 Event Compensation and Number of Bouts Fought, while 37 claims disputed the prepopulated figures.
3 Of these 37 contested claims, 9 Claimants submitted sufficient documentation to support an adjustment
4 of the Event Compensation and/or Number of Bouts Fought data figures. *Id.* ¶ 9.

5 The remaining 28 contested claims were designated as deficient and on June 30, 2025, Angeion
6 sent each of these Claimants a deficiency notice explaining the reasons why the claim was designated
7 as deficient along with instructions on how to cure the deficiency. *Id.* ¶ 10 (*see also* template deficiency
8 notice attached as Exhibit C to the Final Report (ECF No. 1068-4)). After receiving some responses to
9 the deficiency notices, Angeion determined that 8 Claimants had fully cured the deficiency issues with
10 their claims; 15 Claimants provided a partial cure; and the remaining contested claims would be
11 determined using the prepopulated information in their claim forms. *Id.* ¶ 11. With the completion of
12 the review and deficiency process, Angeion determined that all 1,088 claims were valid with none
13 being rejected. *Id.* ¶ 12. In other words, all 1,088 Class Members who submitted claims will receive a
14 distribution from the Net *Le v. Zuffa* Settlement Fund.

15 **III. DETERMINING THE CLAIMANTS' SETTLEMENT DISTRIBUTION AMOUNTS**

16 There is a two-step procedure for determining the distribution amounts to be sent to the
17 Claimants: (i) calculate the Net *Le v. Zuffa* Settlement Fund; and (ii) apply the *pro rata* allocation
18 methodology set forth in the Plan of Allocation ¶ 4.

19 The Net *Le v. Zuffa* Settlement Fund is the amount of the gross \$375 million *Le v. Zuffa*
20 Settlement Fund plus the interest accrued through September 30, 2025 less Court-approved awards and
21 expenses to Class Counsel and the Class Representatives, the \$250,000 settlement of Plaintiff Quarry's
22 claims, settlement administration costs and taxes, professional fees, and reserves for anticipated taxes,
23 expenses and fees, as well as an amount set aside to address any unexpected issues that may arise.
24 These figures are summarized in the below table which shows the Net *Le v. Zuffa* Settlement Fund in
25 the amount of \$250,852,427.06:
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1	Settlement Amount	\$375,000,000.00
2	Interest Earned	\$7,503,208.70
3	Attorneys' Fees (including interest) and Costs	(\$126,750,096.57)
4	Service Awards & Plaintiff Quarry's Settlement	(\$1,500,000.00)
5	Notice & Administration Expenses Through July 2025	(\$165,543.07)
6	Total Tax Payments	(\$2,390,950.00)
7	Estimated Future Tax Payments	(\$250,000.00)
8	Future Estimated Notice & Administration Expenses	(\$200,336.00)
9	EconOne Professional Fees	(\$43,856.00)
10	Reserve Fund	(\$350,000.00)
11	Net <i>Le v. Zuffa</i> Settlement Fund	\$250,852,427.06

8 By way of further explanation, the total tax payments reflect the amount of tax paid since the
9 fund was created in 2024 into the third quarter of 2025 and the set aside amount of \$250,000 is to cover
10 any future taxes. The future estimated notice and administration expenses of \$200,336 represents
11 Angeion's anticipated fees and costs from August 2025 through the completion of the distribution
12 process for mailing distribution checks and issuing wires for the distribution amounts (including to
13 Claimants residing in foreign countries), as well as responding to Claimant inquiries, maintaining the
14 Settlement website and 1-800 toll free line, and all other duties or tasks reasonably associated with the
15 claim review and distribution process. The \$43,856 for EconOne's professional fees line entry includes
16 (a) the amount of \$39,306 for fees incurred to date for assisting with the prepopulated claim forms,
17 applying the allocation methodology in the Plan of Allocation to the Net *Le v. Zuffa* Settlement Fund,
18 and addressing issues relating to the contested claims, and (b) a modest reserve in the amount of \$4,550
19 to address any future issues that may arise during the distribution to Claimants. The \$350,000 reserve
20 fund is a set-aside amount to address any unanticipated problems or issues that may arise during the
21 distribution process. If the entire Net *Le v. Zuffa* Settlement Fund was distributed, there would be no
22 funds available to address any legitimate issues raised by a Claimant or to cover unexpected costs, and
23 since many of the distribution amounts are large (see below discussion), the proposed \$350,000 reserve
24 is a reasonable estimated amount to have on hand for unexpected issues.

25 As noted above, in the event there are any funds remaining after this distribution process is
26 completed, then Co-Lead Class Counsel will either seek (a) Court approval for a second *pro rata*
27 distribution or (b) make an application to the Court for a *cy pres* distribution to an appropriate
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1 charitable organization. *See* Plan of Allocation ¶ 16.

2 Under the Plan of Allocation, each Claimant will receive a distribution from the Net *Le v. Zuffa*
 3 Settlement Fund based on two *pro rata* factors: (i) the total compensation each received from the UFC
 4 for participating in UFC bouts (*i.e.*, the fighter’s Event Compensation) during the Class Period; and (ii)
 5 the total number of UFC bouts each fought during the Class Period. Plan of Allocation ¶¶ 4 & 9. The
 6 Net *Le v. Zuffa* Settlement Fund will be divided into two sub-tranches, reflecting the above two factors,
 7 with 70 percent of the allocation to comprise the “Event Compensation sub-tranche” and 30 percent of
 8 the allocation to comprise the “Number of Bouts Fought sub-tranche.” *Id.* ¶¶ 4-5. Applying this
 9 breakdown to the Net *Le v. Zuffa* Settlement Fund of \$250,852,427.06 (as calculated above) yields an
 10 Event Compensation sub-tranche of \$175,596,698.94⁶ and a Number of Bouts Fought sub-tranche of
 11 \$75,255,728.12.⁷

12 To determine each Claimant’s distribution amount, we first aggregate the total Event
 13 Compensation and Number of Bouts Fought for all Claimants, and then determine each Claimant’s *pro*
 14 *rata* share of the Event Compensation sub-tranche and Number of Bouts Fought sub-tranche. The
 15 Claimant’s distribution amount will be the total of their *pro rata* shares of the two sub-tranches added
 16 together. Under the Plan of Allocation (¶ 4), no Claimant will receive a total distribution amount less
 17 than \$15,000, but as explained below, the smallest distribution exceeds this minimum threshold.

18 Together, the 1,088 valid claims account for \$538,853,643.23 in total Event Compensation and
 19 5,318 in total Number of Bouts Fought during the Class Period. Distribution Decl. ¶ 8. To calculate the
 20 Claimant’s *pro rata* share of the Event Compensation sub-tranche, we multiply the amount of the Net
 21 *Le v. Zuffa* Settlement Fund allocated to this tranche by the following ratio: (a) the numerator is the
 22 Event Compensation amount for that Claimant, and (b) the denominator is the sum total of all Event
 23 Compensation amounts by all valid Claimants. As a formula, this calculation looks like:

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 26 ⁶ This amount was determined by multiplying the Net *Le v. Zuffa* Settlement Fund amount of
 27 \$250,852,427.06 by 0.70 (70%).

28 ⁷ This amount was determined by multiplying the Net *Le v. Zuffa* Settlement Fund amount of
 \$250,852,427.06 by 0.30 (30%).

$$1 \quad \$175,596,698.94 \times \frac{\text{Claimant's Event Compensation}}{\$538,853,643.23} = \text{Claimant's } pro \text{ rata share of the}$$

$$2 \quad \text{Event Compensation sub-tranche}$$

3 To calculate the Claimant's *pro rata* share of the Event Compensation sub-tranche, we multiply the
 4 amount of the Net *Le v. Zuffa* Settlement Fund allocated to this tranche by the following ratio: (a) the
 5 numerator is the Number of Bouts Fought for that Claimant during the Class Period, and (b) the
 6 denominator is the sum total of the Number of Bouts Fought by all valid Claimants during the Class
 7 Period. As a formula, this calculation looks like:

$$8 \quad \$75,255,728.12 \times \frac{\text{Claimant's Number of Bouts Fought}}{5,318} = \text{Claimant's } pro \text{ rata share of}$$

$$9 \quad \text{the Total Number of Bouts}$$

$$10 \quad \text{Fought sub-tranche}$$

11 Applying the above calculations to the 1,088 valid claims, the average distribution payment
 12 from the estimated Net *Le v. Zuffa* Settlement fund is \$230,562.89; the median distribution payment is
 13 \$85,863.57; the high payment is \$10,313,690.73; and the lowest distribution payment is \$16,106.36.
 14 See Distribution Decl. Report ¶ 8. Attached as Exhibit A to the Distribution Decl. is a list providing the
 15 distribution amounts to each approved Claimant using the unique claim number assigned by Angeion to
 16 each valid Claimant to help protect the Claimant's privacy. As a further step to protect Claimant
 17 privacy, the Exhibit A is also being filed under seal. The distribution payments to Claimants will be
 18 made by check (with a 90-day void period) or Claimants may access a portal on the Settlement website
 19 to request that their Settlement distribution be paid by wire or another electronic fund payment method.

20 **IV. THE RELIEF REQUESTED BY THIS MOTION TO DISTRIBUTE THE NET *Le v.*** ***Zuffa* SETTLEMENT FUND**

21 With the claims audit process completed, Co-Lead Class Counsel respectfully request the
 22 following relief:

- 23 • The Court approve the allocation of the Net *Le v. Zuffa* Settlement Fund as determined by
- 24 Angeion, with assistance from EconOne and Co-Lead Class Counsel, using the
- 25 methodology set forth in the Plan of Allocation (¶¶ 4, 9) and direct Angeion to distribute to
- 26 each Claimant their *pro rata* share of the Net *Le v. Zuffa* Settlement Fund;
- 27 • The Court direct for inclusion with the distribution of the Net *Le v. Zuffa* Settlement Fund
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1 one claim that was submitted after the deadline that Co-Lead Class Counsel, after consulting
2 with Angeion, recommend be included in the distribution as a Late Approved Claim (*see*
3 Final Report at 2 n.1);

- 4 • The Court authorize Angeion to contact Claimants to encourage them to cash their checks
5 and that Angeion have the discretion to reissue a check for good cause shown;
- 6 • The Court approve withholding \$250,000 from the Net *Le v. Zuffa* Settlement Fund for the
7 payment of future estimated taxes;
- 8 • The Court approve withholding \$350,000 from the Net *Le v. Zuffa* Settlement Fund as a
9 reserve to cover any unanticipated costs or disputes relating to the claims process and
10 distribution of the Net *Le v. Zuffa* Settlement Fund;
- 11 • The Court approve withholding from the Net *Le v. Zuffa* Settlement Fund the amount of
12 \$204,886 for future fees and expenses for the distribution of the Net *Le v. Zuffa* Settlement
13 Fund for the following: (i) \$200,336 for Angeion’s estimated notice and administration
14 expenses; and (ii) \$4,550 to be available for EconOne’s professional fees to assist with any
15 future issues arising from the distribution; and
- 16 • The Court enter an Order releasing and discharging Class Counsel, Angeion, EconOne, and
17 all persons who are involved in the review, verification, calculation, tabulation or any other
18 aspect of the process of the claims filed in this Action, or who are involved in such activities
19 and barring all members of the Class, whether or not, they are to receive payment from the
20 Net *Le v. Zuffa* Settlement Fund, from making any further claim against the Net *Le v. Zuffa*
21 Settlement Fund beyond the amount allocated to them by the Settlement as approved by the
22 Court.

23 **V. CONCLUSION**

24 For the foregoing reasons, Plaintiffs respectfully request that the Court grant their motion to
25 distribute the Net *Le v. Zuffa* Settlement Fund. A proposed form of Order is submitted with this motion.
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1 Dated: September 19, 2025

Respectfully submitted,

2 /s/ Eric L. Cramer

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CERTIFICATE OF SERVICE

I hereby certify that on September 19, 2025, a true and correct copy of Plaintiffs' Memorandum In Support of Their Motion for Disbursement of the Net *Le v. Zuffa* Settlement Fund was served via the U.S. District Court of Nevada's ECF System to all counsel of record who have enrolled in the ECF System.

/s/ Eric L. Cramer

Eric L. Cramer

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Exhibit 1

**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

**DECLARATION OF BACH-VIET NGUYEN OF ANGEION GROUP, LLC
RE THE DISTRIBUTION OF THE NET *LE V. ZUFFA* SETTLEMENT FUND**

I, Bach-Viet Nguyen, declare and state as follows:

1. I am a Project Manager at the class action notice and claims administration firm Angeion Group, LLC (“Angeion”). I am over 21 years of age and am fully familiar with the facts contained herein based upon my personal knowledge.
2. Angeion is not related to or affiliated with the Plaintiffs, the Defendant, Class Counsel or Defendant’s Counsel.
3. Angeion was retained as the Claims Administrator for the Settlement and appointed by the Court pursuant to the Order Granting Plaintiffs’ Motion to Approve Class Notice Plan, ¶ 1 (ECF No. 921), and the Order Preliminarily Approving Settlement, Preliminarily Approving the Plan of Allocation, Approving the Notice Plan, and Approving the Proposed Schedule for Completing the Settlement Process (the “Preliminary Approval Order”), ¶ 9 (ECF No. 1053).
4. The purpose of this declaration is to provide the Court with updated information on the

amount of the Net *Le v. Zuffa* Settlement Fund (defined in the Plan of Allocation, at 1 (ECF No. 1045-5)) based on the amount of interest accrued through September 30, 2025, the payment of taxes into the third quarter 2025, and adjustments for other costs and expenses to prepare the proposed distribution of the Net *Le v. Zuffa* Settlement Fund to Claimants as described below.¹

Distribution To Eligible Claimants

5. As discussed in the Final Report (¶¶ 14-16), Angeion worked with Plaintiffs' economic experts, EconOne Research, Inc. ("EconOne"), and Co-Lead Class Counsel to determine the amount of the estimated Net *Le v. Zuffa* Settlement Fund as of September 2, 2025. This declaration provides the amount of Net *Le v. Zuffa* Settlement as of September 30, 2025 for the proposed distribution to the 1,088 Claimants using the allocation methodology in the Plan of Allocation, ¶¶ 4, 9, 14-16.

6. Accounting for the \$375,000,000 *Le v. Zuffa* Settlement Fund together with interest earned in the amount of \$7,503,208.70, minus Court-approved attorneys' fees (including interest) and costs in the total amount of \$126,750,096.57,² service awards for the Class Representatives and Plaintiff Quarry's Settlement as approved by the Court in the total amount of \$1,500,000, total tax payments from inception of the fund into third quarter 2025 in the amount of \$2,390,950, estimated future tax payments in the amount of \$250,000, Angeion's noticing and administration expenses through July 2025 in the amount of \$165,543.07, a reserve for Angeion's anticipated administration fees for the distribution in the amount of \$200,336, EconOne's professional fees associated with the Settlement in the amount of \$43,856, and a reserve for unexpected expenses or issues in the amount of \$350,000,³ the amount of the Net *Le v. Zuffa* Settlement Fund for the

¹ Angeion's final report to the Court on the claims review process used a cut-off date of September 2, 2025 for interest, taxes, and expenses to calculate an estimated Net *Le v. Zuffa* Settlement amount along with preliminary figures for a proposed distribution. See Declaration of Bach-Viet Nguyen of Angeion Group LLC re Final Report to the Court Regarding Distribution of the Net Settlement Fund – Corrected ("Final Report"), ¶¶ 14-16 (September 2, 2025). ECF No. 1069.

² The Court awarded attorneys' fees of \$115.2 million, plus accrued interest, and \$9,572,685.17 in litigation expenses. See ECF No. 1065 ¶¶ 7-8.

³ The \$350,000 withheld from the Net *Le v. Zuffa* Settlement Fund is reasonably calculated to address any unanticipated disputes or discrepancies arising after distribution of the Net *Le v. Zuffa* Settlement Fund. Subject to further Order of the Court and where economically feasible, any monies from the Net *Le v. Zuffa* Settlement fund that

proposed distribution to the Claimants is \$250,852,427.06:

Settlement Amount	\$375,000,000.00
Interest Earned	\$7,503,208.70
Attorneys' Fees (including interest) and Costs	(\$126,750,096.57)
Service Awards & Plaintiff Quarry's Settlement	(\$1,500,000.00)
Notice & Administration Expenses Through July 2025	(\$165,543.07)
Total Tax Payments	(\$2,390,950.00)
Estimated Future Tax Payments	(\$250,000.00)
Future Estimated Notice & Administration Expenses	(\$200,336.00)
EconOne Professional Fees	(\$43,856.00)
Reserve Fund	(\$350,000.00)
Net Settlement Fund	\$250,852,427.06

7. The Court approved Plan of Allocation divides the Net *Le v. Zuffa* Settlement Fund into two sub-tranches, with 70 percent of the allocation to comprise the “Event Compensation sub-tranche” and 30 percent of the allocation to comprise the “Number of Bouts sub-tranche.” ECF No. 1045-5, ¶¶ 4-5. The Plan of Allocation further provides all Claimants will receive a minimum recovery amount of \$15,000. *See id.* ¶ 4.

8. As described in the Final Report (¶¶ 5-13), Angeion reviewed the claims (including all deficiency responses received to date) and determined that a total of 1,088 Class Member claims with Event Compensation during the Class Period for this group totaling \$538,853,643.23 and the Number of Bouts during the Class Period for this group totaling 5,318 were valid and eligible for a Settlement distribution payment. Each eligible Claimant's *pro rata* share of the Event Compensation sub-tranche, which totals \$175,596,698.94,⁴ was determined by multiplying the total value of the Event Compensation sub-tranche by the following ratio: (a) the numerator is the Event Compensation amount for that Claimant, and (b) the denominator is the sum total of all Event Compensation amounts by all valid Claimants. Additionally, the eligible Claimant's *pro rata* share of the Number of Bouts sub-tranche, which totals \$75,255,728.12,⁵ was determined by

remain after the initial distribution will be distributed to Claimants in an additional *pro rata* distribution or distributions. If economically infeasible, Co-Lead Class Counsel shall make an application to the Court for such sums to be used to make a *cy pres* payment to an appropriate charitable organization. *See* ECF 1045-5, ¶ 16.

⁴ This amount was determined by multiplying the Net Settlement Fund amount of \$250,852,427.06 by 0.70 (70%).

⁵ This amount was determined by multiplying the Net Settlement Fund amount of \$250,852,427.06 by 0.30 (30%).

multiplying the total value of the Number of Bouts sub-tranche by the following ratio: (a) the numerator is the Number of Bouts for that Claimant during the Class Period, and (b) the denominator is the sum total of all Bouts by all valid Claimants during the Class Period. Using this formula, the average distribution payment from the estimated Net *Le v. Zuffa* Settlement fund is \$230,562.89; the median distribution payment is \$85,863.57; the high payment is \$10,313,690.73; and the lowest distribution payment is \$16,106.36.

9. Attached at Exhibit A (which is filed under seal) is a list providing the distribution amounts to each of 1,088 approved Claimants using the unique claim number assigned by Angeion to each valid Claimant to protect the Claimant's privacy.

Next Steps

10. Angeion will continue to maintain and monitor the Settlement Website, dedicated email address, and toll-free hotline and respond to general Class Member inquiries and Claimant requests for information regarding filed claims, Notices, and issued distribution payments.

11. There are currently no rejected claims, however, should any future claims be received and rejected, Angeion will send a Notice of Denial in accordance with the Plan of Allocation. *See* ECF No. 1045-5, ¶ 7.

12. Angeion will distribute payment of approved claims. Angeion will also process distribution checks returned as undeliverable and requests from Claimants in the event a distribution payment is lost or damaged or otherwise requires reissuance.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: September 19, 2025

/s/ Bach-Viet Nguyen
BACH-VIET NGUYEN

Exhibit A

FILED UNDER SEAL

1 Before this Court is Plaintiffs’ Motion for Disbursement of the Net *Le v. Zuffa* Settlement Fund
2 (the “Motion”). The Court has considered all the materials and arguments submitted in support of the
3 Motion, including the Declaration of Bach-Viet Nguyen of Angeion Group LLC re the Distribution of
4 the Net *Le v. Zuffa* Settlement Fund, dated September 19, 2025 (the “Distribution Decl.”), and
5 Plaintiffs’ Memorandum in Support of the Motion (the “Memorandum”).

6 **NOW, THEREFORE, IT IS HEREBY ORDERED THAT:**

7 1. This Order incorporates by reference the definitions in the Motion, Distribution Decl.,
8 Memorandum, and the Settlement Agreement referred to in this Court’s Order granting final approval
9 of the Settlement (“Final Approval Order”) resolving all claims against the Defendant in exchange for
10 \$375 million (which amount constitutes the *Le v. Zuffa* Settlement Fund). ECF No. 1064.

11 2. Plaintiffs’ Motion is GRANTED. Accordingly,

12 a. The allocation determinations made by the Court-approved claims administrator,
13 Angeion Group LLC (“Angeion”), with the assistance of Co-Lead Class Counsel¹ and Plaintiffs’
14 economic experts, EconOne Research, Inc. (“EconOne”), based on the Court-approved Plan of
15 Allocation (ECF No. 1045-5), as set forth in the Distribution Decl., are adopted.

16 b. The Court directs that one claim that was submitted after the deadline² shall be included
17 in the distribution of the Net *Le v. Zuffa* Settlement Fund as a Late Approved Claim.

18 c. Angeion is directed to conduct the distribution of the Net *Le v. Zuffa* Settlement Fund to
19 Class Members as set forth in Exhibit A to the Distribution Decl. and pursuant to the Plan of
20 Allocation.

21 d. All checks that are not cashed within 90 days after the issue date will become void.
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25 ¹ Co-Lead Class Counsel refers to Berger Montague PC, Cohen Milstein Sellers & Toll PLLC, and the
26 Joseph Saveri Law Firm LLP. The term “Class Counsel” refers to Co-Lead Class Counsel and the
27 following firms: Wolf, Rifkin, Shapiro, Schulman & Rabkin, LLP; Kemp Jones, LLP; Warner Angle
Hallam Jackson & Formanek PLC; Clark Hill PLC; The Radice Law Firm; and Spector Roseman
Kodroff & Willis.

28 ² See Declaration of Bach-Viet Nguyen of Angeion Group LLC re Final Report to the Court Regarding
Distribution of the Net Settlement Fund - Corrected, at 2 n.1 (September 2, 2025). ECF No. 1069.

1 e. Class Members³ are encouraged to cash their checks promptly and to avoid or reduce
2 future expenses relating to unpaid checks. All checks shall note that they become void and the recovery
3 forfeited if not cashed within 90 days of issuance. As part of this process, the Court authorizes Angeion
4 to contact Class Members to encourage them to cash their checks and that Angeion has the discretion to
5 reissue a check for good cause shown.

6 f. Class Members who do not cash their checks within the time allotted will irrevocably
7 forfeit all recovery from the Settlement.

8 g. No further claims received by Angeion shall be allowed.

9 h. Co-Lead Class Counsel are authorized to direct the payment of up to \$204,886 from the
10 *Le v. Zuffa* Settlement Fund for future estimated expenses (e.g., for mailing checks, issuing wires, and
11 other administrative costs) for the distribution of the Net *Le v. Zuffa* Settlement Fund.

12 i. Co-Lead Class Counsel are authorized to direct the payment of up to \$250,000 from the
13 *Le v. Zuffa* Settlement Fund for future estimated taxes.

14 j. The amount of \$350,000 shall be withheld from the Net *Le v. Zuffa* Settlement Fund as a
15 reserve that may be applied to address any unanticipated expenses or issues arising from the claims
16 process and distribution of the Net *Le v. Zuffa* Settlement Fund.

17 3. Class Counsel, Angeion, EconOne, and all persons who are involved in the review,
18 verification, calculation, tabulation or any other aspect of the process of the claims filed in this Action,
19 or who are involved in such activities, are released and discharged from any liability for claims arising
20 out of the administration of the *Le v. Zuffa* Settlement Fund or the Net *Le v. Zuffa* Settlement Fund.

21 4. All members of the Class, whether or not they are to receive payment from the Net *Le v.*
22 *Zuffa* Settlement Fund, are barred from making any further claim against the Net *Le v. Zuffa* Settlement
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26 ³ The Class is defined to include all persons who competed in one or more live professional UFC
27 promoted MMA bouts taking place or broadcast in the U.S. from December 16, 2010 to June 30, 2017
28 (the “Class Period”), but excludes all persons who are not residents or citizens of the U.S. unless the
UFC paid such persons for competing in a bout fought in the U.S. *See* ECF No. 839, at 79; ECF No.
1053 at 2; ECF No. 1064 at 3.

1 Fund beyond the amount allocated to them by the Settlement as approved by the Court.⁴

2 5. The Court retains jurisdiction over any further application or matter which may arise in
3 connection with the administration of the Settlement.

4 **IT IS SO ORDERED.**

5 DATED: September __, 2025

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RICHARD F. BOULWARE, II
8 **UNITED STATES DISTRICT JUDGE**

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27 ⁴ If there are funds remaining at the conclusion of this distribution process, then Co-Lead Class
28 Counsel shall seek Court approval for a second distribution, or if that is economically impracticable,
then Co-Lead Class Counsel will make an application to the Court for a *cy pres* distribution to an
appropriate charitable organization.