

**BLACK & LOBELLO**  
10777 West Twain Avenue, Suite 300  
Las Vegas, Nevada 89135  
(702) 869-8801 FAX: (702) 869-2669

1 **NOTC**  
2 **BLACK & LOBELLO**  
3 Maximiliano D. Couvillier III, Esq.  
4 Nevada Bar No. 7661  
5 10777 West Twain Avenue, Third Floor  
6 Las Vegas, Nevada 89135  
7 Ph. (702) 869-8801  
8 Fax (702) 869-2669  
9 mcouvillier@blacklobello.law

6 *Attorneys for Defendants MMAWC, LLC, Bruce Deifik and*  
7 *The Nancy And Bruce Deifik Family Partnership LLLP*

8 **DISTRICT COURT**

9 **CLARK COUNTY, NEVADA**

10  
11 ZION WOOD OBI WAN TRUST and SHAWN  
12 WRIGHT as trustee of ZION WOOD OBI WAN  
13 TRUST; WSOF GLOBAL, LLC, a Wyoming  
14 limited liability company,

15 Plaintiffs,

16 v.

17 MMAWC, LLC d/b/a WORLD SERIES OF  
18 FIGHTING a Nevada limited liability company;  
19 MMAX INVESTMENT PARTNERS, INC. dba  
20 PROFESSIONAL FIGHTERS LEAGUE, a  
21 Delaware corporation; BRUCE DEIFIK, an  
22 individual; CARLOS SILVA, an individual;  
23 NANCY AND BRUCE DEIFIK FAMILY  
24 PARTNERSHIP LLLP, a Colorado limited  
25 liability partnership; KEITH REDMOND, an  
26 individual; DOES I through X, inclusive; and  
27 ROE Corporations XX through XXX, inclusive,

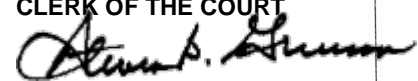
28 Defendants.

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Electronically Filed  
Apr 17 2018 10:12 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

CASE NO.: A-17-764118-C  
DISTRICT COURT DEPT: 27


**NOTICE OF APPEAL BY DEFENDANTS  
MMAWC, LLC, BRUCE DEIFIK & THE  
NANCY AND BRUCE DEIFIK FAMILY  
PARTNERSHIP LLLP**

1 Notice of hereby given that defendants MMAWC, LLC, BRUCE DEIFIK and NANCY  
2 AND BRUCE DEIFIK FAMILY PARTNERSHIP LLLP respectfully appeal to the Nevada  
3 Supreme Court the District Court's March 13, 2018, Order Denying Motion to Dismiss and To  
4 Compel Arbitration.

5 Among other things, NRS 38.247(1)(a) provides: "An appeal may be taken from...[a]n  
6 order denying a motion to compel arbitration." *Id.*

7 Dated: April 11, 2018.

8 **BLACK & LOBELLO**

9  
10   
11 Maximiliano D. Couvillier III, Esq.

12 Nevada Bar No. 7661

13 [mcouvillier@blacklobello.law](mailto:mcouvillier@blacklobello.law)

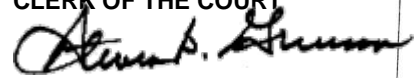
14 *Attorneys for Defendants MMAWC, LLC, Bruce Deifik*  
15 *and the Nancy And Bruce Deifik Family Partnership LLLP*

16 **CERTIFICATE OF SERVICE**

17 I certify that on April 11, 2018, I electronically filed the foregoing **NOTICE OF**  
18 **APPEAL BY DEFENDANTS MMAWC, LLC, BRUCE DEIFIK & THE NANCY AND**  
19 **BRUCE DEIFIK FAMILY PARTNERSHIP LLLP** with the Court's electronic filing and  
20 service system, which provides electronic service to the following registered users:

21  
22 Byron Thomas, Esq. (Bar 8906)  
23 3275 S. Jones Blvd., Ste. 104  
24 Las Vegas, NV 89146  
25 [Byronthomaslaw@gmail.com](mailto:Byronthomaslaw@gmail.com)

26 /s/ Mariella Dumbrique  
27 An Employee of Black & LoBello  
28



1 **ASTA**  
2 **BLACK & LOBELLO**  
3 Maximiliano D. Couvillier III, Esq.  
4 Nevada Bar No. 7661  
5 10777 West Twain Avenue, Third Floor  
6 Las Vegas, Nevada 89135  
7 Ph. (702) 869-8801  
8 Fax (702) 869-2669  
9 mcouvillier@blacklobello.law

10 *Attorneys for Defendants MMAWC, LLC, Bruce Deifik and*  
11 *The Nancy And Bruce Deifik Family Partnership LLLP*

12 **DISTRICT COURT**

13 **CLARK COUNTY, NEVADA**

14 ZION WOOD OBI WAN TRUST and SHAWN  
15 WRIGHT as trustee of ZION WOOD OBI WAN  
16 TRUST; WSOF GLOBAL, LLC, a Wyoming  
17 limited liability company,

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19 v.

20 MMAWC, LLC d/b/a WORLD SERIES OF  
21 FIGHTING a Nevada limited liability company;  
22 MMAX INVESTMENT PARTNERS, INC. dba  
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24 Delaware corporation; BRUCE DEIFIK, an  
25 individual; CARLOS SILVA, an individual;  
26 NANCY AND BRUCE DEIFIK FAMILY  
27 PARTNERSHIP LLLP, a Colorado limited  
28 liability partnership; KEITH REDMOND, an  
individual; DOES I through X, inclusive; and  
ROE Corporations XX through XXX, inclusive,

Defendants.

CASE NO.: A-17-764118-C  
DISTRICT COURT DEPT: 27

**CASE APPEAL STATEMENT BY  
DEFENDANTS MMAWC, LLC, BRUCE  
DEIFIK & THE NANCY AND BRUCE  
DEIFIK FAMILY PARTNERSHIP LLLP**

**BLACK & LOBELLO**  
10777 West Twain Avenue, Suite 300  
Las Vegas, Nevada 89135  
(702) 869-8801 FAX: (702) 869-2669

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Defendants MMAWC, LLC ("MMAWC"), BRUCE DEIFIK ("Deifik") and The NANCY AND BRUCE DEIFIK FAMILY PARTNERSHIP LLLP ("Family Partnership") submit the following Case Appeal Statement pursuant to NRAP 3(f):

1. **The name of the Judge who entered order being appealed:** The Honorable Nancy Allf, Eighth Judicial District Court, Department 27.

2. **The name of each appellant and the name and address of counsel for each appellant:** The appellants are defendants MMAWC, Deifik and the Family Partnership, and their counsel is:

MAXIMILIANO D. COUVILLIER III, ESQ.  
Nevada State Bar No. 007661  
Black & LoBello  
10777 West Twain Avenue, Suite 300  
Las Vegas, Nevada 89117  
(702) 869-8801  
[mcouvillier@blacklobello.law](mailto:mcouvillier@blacklobello.law)

3. **The name of each respondent and the name and address of counsel for each respondent:** The respondents are the plaintiffs ZION WOOD OBI WAN TRUST ("Zion Trust"), SHAWN WRIGHT ("Wright") as trustee of ZION WOOD OBI WAN TRUST; and WSOF GLOBAL, LLC ("Global"), and their counsel is:

Byron Thomas, Esq. (Bar 8906)  
3275 S. Jones Blvd., Ste. 104  
Las Vegas, NV 89146  
[Byronthomaslaw@gmail.com](mailto:Byronthomaslaw@gmail.com)  
Ph. 702-747-3103

4. **All attorneys identified in Numbers 2 and 3, *supra*, are licensed to practice in Nevada.**

5. **Appellants were not represented by appointed counsel in the District Court and are not being represented by appointed counsel on appeal.**

6. **Appellants did not apply and were not granted leave proceed *in forma***

1 *pauperis* by the District Court.

2 7. **The date the proceedings commenced in the District Court:** The proceedings  
3 were commenced by the filing of the Complaint on November 3, 2017.

4 8. **Brief description of the action and result in the District Court including the**  
5 **type of the order being appealed:**  
6

7 Respondents/Plaintiffs hold certain interests in MMAWC. MMAWC's previous primary  
8 asset and business was operating and promoting mixed martial arts ("MMA") events under the  
9 marks and monikers "World Series of Fighting" and "WSOF," which intellectual property  
10 MMAWC owned. In 2016, MMAWC sold substantially all of its assets, including the "World  
11 Series of Fighting" and "WSOF" marks and monikers, to MMAX Investment Partners, Inc.  
12 ("MMAX"). MMAWC refocused its business from operating and promoting its own MMA  
13 events and became an investor in MMAX, and MMAX began operating and promoting its own  
14 MMA events under MMAX's marks and monikers "WSOF", "World Series of Fighting", and  
15 "Professional Fighter's League." Thus, MMAWC's current primary asset and operation is  
16 being an investor in MMAX.

17 Respondents/Plaintiffs are not direct investors, and do not hold any rights, in MMAX.  
18 By their lawsuit, however, respondents/plaintiffs are attempting to somehow transcend their  
19 interest in MMACW into a direct ownership interest in MMAX, and MMAX's intellectual  
20 properties.

21 All of Respondents' causes of action are contract-based and subject to a mandatory  
22 Arbitration provision. The Arbitration provision was negotiated and jointly drafted by  
23 respondent/plaintiff Global, Global's predecessor, Global's controlling individuals, and  
24 respondents' counsel, Byron Thomas, Esq. The express agreement to the jointly negotiated and  
25 drafted Arbitration provision was manifested in the written communications between the parties,  
26 and exchange of drafts during the joint drafting process.

27 When the parties finalized the Arbitration provision, however, the parties did not include  
28

1 language and initials or separate signatures to further manifest their agreement to the Arbitration  
2 provision [such being manifestly redundant]. Nevertheless, the District Court found that such  
3 failure resulted in non-compliance with NRS 597.995, voided the jointly drafted and negotiated  
4 Arbitration provision, and denied appellants/defendants' motion to compel arbitration.

5 9. The case has not been previously the subject of an appeal to or original writ  
6 proceeding in the Supreme Court or Court of Appeals.

7 10. The appeal does not involve child custody or visitation.

8 11. This is a civil appeal and, albeit unlikely, it may involve the possibility of  
9 settlement.  
10

11 Dated: April 11, 2018.

12 **BLACK & LOBELLO**

13  
14 

15 Maximiliano D. Couvillier III, Esq.

16 Nevada Bar No. 7661

17 [mcouvillier@blacklobello.law](mailto:mcouvillier@blacklobello.law)

18 *Attorneys for Defendants MMAWC, LLC, Bruce Deifik*  
19 *and the Nancy And Bruce Deifik Family Partnership LLLP*  
20  
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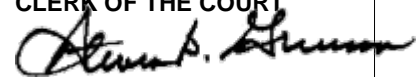
**BLACK & LOBELLO**  
10777 West Twain Avenue, Suite 300  
Las Vegas, Nevada 89135  
(702) 869-8801 FAX: (702) 869-2669

**CERTIFICATE OF SERVICE**

I certify that on April 11, 2018, I electronically filed the foregoing **CASE APPEAL STATEMENT BY DEFENDANTS MMAWC, LLC, BRUCE DEIFIK & THE NANCY AND BRUCE DEIFIK FAMILY PARTNERSHIP LLLP** with the Court's electronic filing and service system, which provides electronic service to the following registered users:

Byron Thomas, Esq. (Bar 8906)  
3275 S. Jones Blvd., Ste. 104  
Las Vegas, NV 89146  
Byronthomaslaw@gmail.com

/s/ Mariella Dumbrique  
An Employee of Black & LoBello



**NPP**  
**BLACK & LOBELLO**  
Maximiliano D. Couvillier III, Esq.  
Nevada Bar No. 7661  
10777 West Twain Avenue, Third Floor  
Las Vegas, Nevada 89135  
Ph. (702) 869-8801  
Fax (702) 869-2669  
[mcouvillier@blacklobello.law](mailto:mcouvillier@blacklobello.law)

*Attorneys for Defendants MMAWC, LLC, Bruce Deifik and  
The Nancy And Bruce Deifik Family Partnership LLLP*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

ZION WOOD OBI WAN TRUST and SHAWN  
WRIGHT as trustee of ZION WOOD OBI WAN  
TRUST; WSOF GLOBAL, LLC, a Wyoming  
limited liability company,

Plaintiffs,

v.

MMAWC, LLC d/b/a WORLD SERIES OF  
FIGHTING a Nevada limited liability company;  
MMAX INVESTMENT PARTNERS, INC. dba  
PROFESSIONAL FIGHTERS LEAGUE, a  
Delaware corporation; BRUCE DEIFIK, an  
individual; CARLOS SILVA, an individual;  
NANCY AND BRUCE DEIFIK FAMILY  
PARTNERSHIP LLLP, a Colorado limited  
liability partnership; KEITH REDMOND, an  
individual; DOES I through X, inclusive; and  
ROE Corporations XX through XXX, inclusive,

Defendants.

CASE NO.: A-17-764118-C  
DISTRICT COURT DEPT: 27

**NOTICE OF POSTING BOND ON  
APPEAL BY DEFENDANTS  
MMAWC, LLC, BRUCE DEIFIK & THE  
NANCY AND BRUCE DEIFIK FAMILY  
PARTNERSHIP LLLP**

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1 Notice of hereby given that, on April 12, 2018, defendants MMAWC, LLC, BRUCE  
2 DEIFIK and NANCY AND BRUCE DEIFIK FAMILY PARTNERSHIP LLLP posted a bond  
3 on appeal in the sum of \$500. A copy of the Official Receipt of the bond check paid to the Clark  
4 County District Court Clerk is attached here as Exhibit 1.

5 Dated: April 12, 2018.

6 **BLACK & LOBELLO**

7  
8  
9 /s/ Maximiliano D. Couvillier III

10 Maximiliano D. Couvillier III, Esq.

11 Nevada Bar No. 7661

12 [mcouvillier@blacklobello.law](mailto:mcouvillier@blacklobello.law)

13 *Attorneys for Defendants MMAWC, LLC, Bruce Deifik*  
14 *and the Nancy And Bruce Deifik Family Partnership LLLP*

15 **CERTIFICATE OF SERVICE**

16 I certify that on April 13, 2018, I electronically filed the foregoing **NOTICE OF**  
17 **POSTING BOND ON APPEAL BY DEFENDANTS MMAWC, LLC, BRUCE DEIFIK &**  
18 **THE NANCY AND BRUCE DEIFIK FAMILY PARTNERSHIP LLLP** with the Court's  
19 electronic filing and service system, which provides electronic service to the following registered  
20 users:

21 Byron Thomas, Esq. (Bar 8906)

22 3275 S. Jones Blvd., Ste. 104

23 Las Vegas, NV 89146

24 [Byronthomaslaw@gmail.com](mailto:Byronthomaslaw@gmail.com)

25 /s/ Mariella Dumbrique

26 An Employee of Black & LoBello

# **EXHIBIT 1**

# OFFICIAL RECEIPT

District Court Clerk of the Court 200 Lewis Ave, 3rd Floor Las Vegas, NV 89101

Payor  
Christopher Childs, Chtd

Receipt No.  
**2018-25416-CCCLK**

Transaction Date  
04/12/2018

Description	Amount Paid
-------------	-------------

On Behalf Of MMAWC LLC  
A-17-764118-C  
Zion Wood Obi Wan Trust, Plaintiff(s) vs. MMAWC LLC, Defendant(s)  
Appeal Bond

Appeal Bond	500.00
<b>SUBTOTAL</b>	<b>500.00</b>

<b>PAYMENT TOTAL</b>	<b>500.00</b>
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Check (Ref #0348) Tendered	500.00
Total Tendered	<b>500.00</b>
Change	0.00

Notice of Appeal filed 4/11/18

04/12/2018  
01:11 PM

Cashier  
Station AIKO

Audit  
36130470

## OFFICIAL RECEIPT



DEPARTMENT 27  
**CASE SUMMARY**  
**CASE NO. A-17-764118-C**

**Zion Wood Obi Wan Trust, Plaintiff(s)**  
**vs.**  
**MMAWC LLC, Defendant(s)**

§  
§  
§  
§  
§

Location: **Department 27**  
Judicial Officer: **Allf, Nancy**  
Filed on: **11/03/2017**  
Cross-Reference Case Number: **A764118**

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**CASE INFORMATION**

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Case Type: **Other Civil Matters**

Case Flags: **Appealed to Supreme Court**

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**DATE**

**CASE ASSIGNMENT**

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**Current Case Assignment**

Case Number	A-17-764118-C
Court	Department 27
Date Assigned	11/03/2017
Judicial Officer	Allf, Nancy

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**PARTY INFORMATION**

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		<i>Lead Attorneys</i>
<b>Plaintiff</b>	<b>Wright, Shawn</b>	<b>Thomas, Byron E.</b> <i>Retained</i> 702-382-1714(W)
	<b>WSOF Global, LLC</b>	<b>Thomas, Byron E.</b> <i>Retained</i> 702-382-1714(W)
	<b>Zion Wood Obi Wan Trust</b>	<b>Thomas, Byron E.</b> <i>Retained</i> 702-382-1714(W)
<b>Defendant</b>	<b>Deifik, Bruce</b>	<b>Couvillier III, Maximiliano D.</b> <i>Retained</i> 702-869-8801(W)
	<b>MMAWC LLC</b>	<b>Couvillier III, Maximiliano D.</b> <i>Retained</i> 702-869-8801(W)
	<b>MMA INVESTMENT PARTNERS INC. dba PROFESSIONAL FIGHTERS LEAGUE</b>	
	<b>NANCY AND BRUCE DEIFIK FAMILY PARTNERSHIP LLLP</b>	<b>Couvillier III, Maximiliano D.</b> <i>Retained</i> 702-869-8801(W)
	<b>Redmond, Keith</b>	
	<b>Silva, Carlos</b>	

---

**DATE**

**EVENTS & ORDERS OF THE COURT**

**INDEX**

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11/03/2017



Complaint














Filed By: Plaintiff Zion Wood Obi Wan Trust; Plaintiff WSOF Global, LLC; Plaintiff Wright, Shawn  
*Complaint*

11/03/2017









Initial Appearance Fee Disclosure

DEPARTMENT 27  
**CASE SUMMARY**  
**CASE NO. A-17-764118-C**

	Filed By: Plaintiff WSOF Global, LLC; Plaintiff Wright, Shawn <i>Initial Appearance Fee Disclosure</i>
12/07/2017	 Summons Electronically Issued - Service Pending <i>Summons</i>
12/07/2017	 Summons Electronically Issued - Service Pending Party: Plaintiff Zion Wood Obi Wan Trust; Plaintiff WSOF Global, LLC <i>Summons</i>
12/07/2017	 Summons Electronically Issued - Service Pending <i>Summons</i>
12/07/2017	 Summons Electronically Issued - Service Pending <i>Summons</i>
12/15/2017	 Summons Electronically Issued - Service Pending <i>Summons - Civil</i>
12/15/2017	 Summons Electronically Issued - Service Pending <i>Summons - Civil</i>
01/08/2018	 Initial Appearance Fee Disclosure Filed By: Defendant MMAWC LLC <i>Initial Appearance Fee Disclosure</i>
01/08/2018	 Motion to Dismiss Filed By: Defendant MMAWC LLC <i>Motion to Dismiss Complaint and to Compel Arbitration</i>
02/02/2018	 Opposition to Motion to Dismiss Filed By: Plaintiff Zion Wood Obi Wan Trust; Plaintiff Wright, Shawn <i>Opposition to Defendant MMAWC, LLC d/b/a World Series of Fighting Motion to Dismiss</i>
02/15/2018	 Reply in Support Filed By: Defendant MMAWC LLC <i>Reply in Support of Motion to Dismiss Complaint and to Compel Arbitration</i>
02/21/2018	 <b>Motion to Dismiss</b> (10:00 AM) (Judicial Officer: Allf, Nancy) <i>Motion to Dismiss Complaint and to Compel Arbitration</i>
03/13/2018	<b>Order of Dismissal Without Prejudice</b> (Judicial Officer: Allf, Nancy) Debtors: Zion Wood Obi Wan Trust (Plaintiff), WSOF Global, LLC (Plaintiff), Shawn Wright (Plaintiff) Creditors: MMAWC LLC (Defendant) Judgment: 03/13/2018, Docketed: 03/13/2018 Comment: Certain Cause
03/13/2018	 Order <i>Order Re: MMAWC, LLC's Motion to Dismiss and to Compel Arbitration</i>
03/14/2018	 Notice of Entry of Order Filed By: Defendant MMAWC LLC <i>Notice of Entry of Order Re: MMAWC, LLC's Motion to Dismiss and to Compel Arbitration</i>

DEPARTMENT 27  
**CASE SUMMARY**  
**CASE No. A-17-764118-C**

03/14/2018	 Amended Notice of Entry of Order Filed By: Defendant MMAWC LLC <i>Amended Notice of Entry of Order re: MMAWC, LLC's Motion to Dismiss and to Compel Arbitration</i>
03/23/2018	 Motion to Dismiss Filed By: Defendant Deifik, Bruce; Defendant NANCY AND BRUCE DEIFIK FAMILY PARTNERSHIP LLLP <i>Motion to Dismiss Complaint and to Compel Arbitration by Defendants Defendant Bruce Deifik and Nancy and Bruce Deifik Family Partnership LLLP</i>
03/23/2018	 Initial Appearance Fee Disclosure Filed By: Defendant NANCY AND BRUCE DEIFIK FAMILY PARTNERSHIP LLLP <i>Initial Appearance Fee Disclosure</i>
04/11/2018	 Notice of Appeal Filed By: Defendant MMAWC LLC; Defendant Deifik, Bruce; Defendant NANCY AND BRUCE DEIFIK FAMILY PARTNERSHIP LLLP <i>Notice of Appeal by Defendants MMAWC, LLC, Bruce Deifik &amp; The Nancy and Bruce Deifik Family Partnership LLLP</i>
04/11/2018	 Case Appeal Statement Filed By: Defendant MMAWC LLC; Defendant Deifik, Bruce; Defendant NANCY AND BRUCE DEIFIK FAMILY PARTNERSHIP LLLP <i>Case Appeal Statement by Defendants MMAWC, LLC, Bruce Deifik &amp; The Nancy and Bruce Deifik Family Partnership LLLP</i>
04/13/2018	 Notice of Posting Bond Filed By: Defendant MMAWC LLC; Defendant Deifik, Bruce; Defendant NANCY AND BRUCE DEIFIK FAMILY PARTNERSHIP LLLP <i>Notice of Posting Bond on Appeal by Defendants MMAWC, LLC, Bruce Deifik &amp; The Nancy and Bruce Deifik Family Partnership LLLP</i>

DATE	FINANCIAL INFORMATION
	<b>Defendant Deifik, Bruce</b> Total Charges 253.00 Total Payments and Credits 253.00 <b>Balance Due as of 4/13/2018 0.00</b>
	<b>Defendant MMAWC LLC</b> Total Charges 247.00 Total Payments and Credits 247.00 <b>Balance Due as of 4/13/2018 0.00</b>
	<b>Plaintiff Zion Wood Obi Wan Trust</b> Total Charges 330.00 Total Payments and Credits 330.00 <b>Balance Due as of 4/13/2018 0.00</b>
	<b>Defendant MMAWC LLC</b> Appeal Bond Balance as of 4/13/2018 <b>500.00</b>



# DISTRICT COURT CIVIL COVER SHEET

County, Nevada  
Case No. \_\_\_\_\_  
*(Assigned by Clerk's Office)*

**A-17-764118-C**  
Department 27

## I. Party Information *(provide both home and mailing addresses if different)*

Plaintiff(s) (name/address/phone): <div style="text-align: center;">WSOF Global, LLC</div> <div style="text-align: center;">Zion Wood Obi Wan Trust</div> <div style="text-align: center;">Shawn Wright as Trustee of Zion Wood Obi Wan Trust</div>	Defendant(s) (name/address/phone): <div style="text-align: center;">Nancy and Bruce Diefik Family Partnership LLP</div> <div style="text-align: center;">MMAWC d/b/a World Series of Fighting</div> <div style="text-align: center;">Carlos Silva, Keith Redmon</div> <div style="text-align: center;">MMAX Investment Partners</div>
Attorney (name/address/phone): Byron Thomas, Esq., 3275 S. Jones Blvd., Las Vegas Nevada 89146	Attorney (name/address/phone):

## II. Nature of Controversy *(please select the one most applicable filing type below)*

### Civil Case Filing Types

<b>Real Property</b> <b>Landlord/Tenant</b> <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> Other Landlord/Tenant <b>Title to Property</b> <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Other Title to Property <b>Other Real Property</b> <input type="checkbox"/> Condemnation/Eminent Domain <input type="checkbox"/> Other Real Property	<b>Negligence</b> <input type="checkbox"/> Auto <input type="checkbox"/> Premises Liability <input type="checkbox"/> Other Negligence <b>Malpractice</b> <input type="checkbox"/> Medical/Dental <input type="checkbox"/> Legal <input type="checkbox"/> Accounting <input type="checkbox"/> Other Malpractice	<b>Torts</b> <b>Other Torts</b> <input type="checkbox"/> Product Liability <input type="checkbox"/> Intentional Misconduct <input type="checkbox"/> Employment Tort <input type="checkbox"/> Insurance Tort <input type="checkbox"/> Other Tort
<b>Probate</b> <b>Probate</b> <i>(select case type and estate value)</i> <input type="checkbox"/> Summary Administration <input type="checkbox"/> General Administration <input type="checkbox"/> Special Administration <input type="checkbox"/> Set Aside <input type="checkbox"/> Trust/Conservatorship <input type="checkbox"/> Other Probate <b>Estate Value</b> <input type="checkbox"/> Over \$200,000 <input type="checkbox"/> Between \$100,000 and \$200,000 <input type="checkbox"/> Under \$100,000 or Unknown <input type="checkbox"/> Under \$2,500	<b>Construction Defect &amp; Contract</b> <b>Construction Defect</b> <input type="checkbox"/> Chapter 40 <input type="checkbox"/> Other Construction Defect <b>Contract Case</b> <input type="checkbox"/> Uniform Commercial Code <input type="checkbox"/> Building and Construction <input type="checkbox"/> Insurance Carrier <input type="checkbox"/> Commercial Instrument <input type="checkbox"/> Collection of Accounts <input type="checkbox"/> Employment Contract <input checked="" type="checkbox"/> Other Contract	<b>Judicial Review/Appeal</b> <b>Judicial Review</b> <input type="checkbox"/> Foreclosure Mediation Case <input type="checkbox"/> Petition to Seal Records <input type="checkbox"/> Mental Competency <b>Nevada State Agency Appeal</b> <input type="checkbox"/> Department of Motor Vehicle <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other Nevada State Agency <b>Appeal Other</b> <input type="checkbox"/> Appeal from Lower Court <input type="checkbox"/> Other Judicial Review/Appeal
<b>Civil Writ</b> <b>Civil Writ</b> <input type="checkbox"/> Writ of Habeas Corpus <input type="checkbox"/> Writ of Mandamus <input type="checkbox"/> Writ of Quo Warrant <input type="checkbox"/> Writ of Prohibition <input type="checkbox"/> Other Civil Writ		<b>Other Civil Filing</b> <b>Other Civil Filing</b> <input type="checkbox"/> Compromise of Minor's Claim <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Other Civil Matters

*Business Court filings should be filed using the Business Court civil coversheet.*

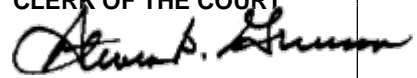
11/2/2017

Date

/s/ Byron E. Thomas, Esq.

Signature of initiating party or representative

*See other side for family-related case filings.*



**ORDR**  
**BLACK & LOBELLO**  
Maximiliano D. Couvillier III, Esq.  
Nevada Bar No. 7661  
10777 West Twain Avenue, Third Floor  
Las Vegas, Nevada 89135  
Ph. (702) 869-8801  
Fax (702) 869-2669  
[mcouvillier@blacklobello.law](mailto:mcouvillier@blacklobello.law)  
*Attorneys for Defendant MMAWC L.L.C.*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

ZION WOOD OBI WAN TRUST and SHAWN  
WRIGHT as trustee of ZION WOOD OBI WAN  
TRUST; WSOF GLOBAL, LLC, a Wyoming  
limited liability company,

Plaintiffs,

v.

MMAWC, LLC d/b/a WORLD SERIES OF  
FIGHTING a Nevada limited liability company;  
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individual; DOES I through X, inclusive; and  
ROE Corporations XX through XXX, inclusive,

Defendants.

CASE NO.: A-17-764118-C  
DISTRICT COURT DEPT: 27

**ORDER RE: MMAWC, LLC's MOTION  
TO DISMISS AND TO COMPEL  
ARBITRATION**

On February 21, 2018, the Court heard the *Motion to Dismiss and To Compel Arbitration* ("Motion") by Defendant MMAWC, LLC ("MMAWC"). Maximiliano D. Couvillier III, Esq. appeared on behalf of MMAWC. Byron Thomas, Esq. appeared on behalf of Plaintiffs. The

1 Court has considered the Motion, all related briefs and documents on file, and the argument of  
2 counsel. For good cause appearing:

3 1) The Motion is **GRANTED IN PART** with respect to Plaintiffs' Eighth Cause of  
4 Action for RICO. Plaintiffs' Eighth Cause of Action for RICO is dismissed without prejudice.  
5 Plaintiffs have leave to amend their RICO claim and file an amended complaint after some  
6 discovery, but must inform the Court on or before March 23, 2018, whether they intend to amend  
7 their RICO claim; and


8 2). The Motion is **DENIED** in all other regards. The Court declines to compel  
9 arbitration because it finds the arbitration provision at issue is void pursuant to NRS 597.995.

10 Dated: March 7, 2018.

11  
12 Nancy L. Hill  
13 District Court Judge  
14 *AL*

15 Respectfully Submitted By,

16 **BLACK & LOBELLO**

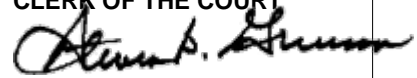
17   
18 Maximiliano D. Couvillier III, Esq., Bar #7661  
19 [mcouvillier@blacklobello.law](mailto:mcouvillier@blacklobello.law)  
20 Attorneys for Defendant MMAWC, L.L.C.

21  
22 Approved to Form and Content,

23 **LAW OFFICE OF BYRON THOMAS**

24  
25 DECLINED  
26 Byron Thomas, Esq., Bar #8906  
27 [byronthomaslaw@gmail.com](mailto:byronthomaslaw@gmail.com)  
28 Attorneys for Plaintiffs





**NOE  
BLACK & LOBELLO**  
Maximiliano D. Couvillier III, Esq. (Bar No. 7661)  
10777 West Twain Avenue, Third Floor  
Las Vegas, Nevada 89135  
Ph. (702) 869-8801  
Fax (702) 869-2669  
[mcouvillier@blacklobello.law](mailto:mcouvillier@blacklobello.law)

*Attorneys for Defendants MMAWC, L.L.C*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

ZION WOOD OBI WAN TRUST, and SHAWN  
WRIGHT as trustee of ZION WOOD OBI WAN  
TRUST; WSOF GLOBAL, LLC, a Wyoming  
limited liability company,

Plaintiff,

v.

MMAWC, LLC d/b/a WORLD SERIES OF  
FIGHTING a Nevada limited liability company;  
MMAX INVESTMENT PARTNERS, INC. dba  
PROFESSIONAL FIGHTERS LEAGUE, a  
Delaware corporation; BRUCE DEIFIK, and  
individual; CARLOS SILVA, an individual;  
NANCY AND BRUCE DEIFIK FAMILY  
PARTNERSHIP LLLP, a Colorado limited  
liability partnership; KEITH REDMOND, an  
individual; DOES I through X, inclusive; and  
ROE Corporations XX through XXX, inclusive,

Defendants

CASE NO.: A-17-764118-C  
DEPT. NO.: 27

**NOTICE OF ENTRY OF ORDER RE:  
MMAWC, LLC's MOTION TO DISMISS  
AND TO COMPEL ARBITRATION**

PLEASE TAKE NOTICE that a ORDER RE: MMAWC, LLC's MOTION TO DISMISS AND

///

///

///

1 TO COMPEL ARBITRATION was entered in the above-entitled matter on the 13<sup>th</sup> day of March  
2 2018, a copy of which is attached hereto.

3  
4 Dated this 14<sup>th</sup> day of March 2018.

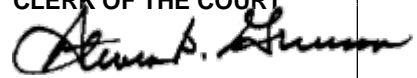
5 **BLACK & LOBELLO**

6  
7 /s/ Maximiliano D. Couvillier III, Esq.  
8 Maximiliano D. Couvillier III, Esq. SBN 7661  
9 [mcouvillier@blacklobello.law](mailto:mcouvillier@blacklobello.law)  
10 *Attorneys for Defendants*

11 **CERTIFICATE OF SERVICE**

12 I certify that on this 14<sup>th</sup> day of March 2018. I electronically filed the foregoing **NOTICE**  
13 **OF ENTRY OF ORDER RE: MMAWC, LLC's MOTION TO DISMISS AND TO COMPEL**  
14 **ARBITRATION** using the Court's electronic filing and service system, which provides service  
15 to the following users:

16  
17  
18  
19 /s/ Mariella Dumbrique  
20 An Employee of Black & LoBello  
21  
22  
23  
24  
25  
26  
27  
28



**ORDR**  
**BLACK & LOBELLO**  
Maximiliano D. Couvillier III, Esq.  
Nevada Bar No. 7661  
10777 West Twain Avenue, Third Floor  
Las Vegas, Nevada 89135  
Ph. (702) 869-8801  
Fax (702) 869-2669  
[mcouvillier@blacklobello.law](mailto:mcouvillier@blacklobello.law)  
*Attorneys for Defendant MMAWC L.L.C.*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

ZION WOOD OBI WAN TRUST and SHAWN  
WRIGHT as trustee of ZION WOOD OBI WAN  
TRUST; WSOF GLOBAL, LLC, a Wyoming  
limited liability company,

Plaintiffs,

v.

MMAWC, LLC d/b/a WORLD SERIES OF  
FIGHTING a Nevada limited liability company;  
MMAX INVESTMENT PARTNERS, INC. dba  
PROFESSIONAL FIGHTERS LEAGUE, a  
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CASE NO.: A-17-764118-C  
DISTRICT COURT DEPT: 27

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5 Plaintiffs have leave to amend their RICO claim and file an amended complaint after some  
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9 arbitration because it finds the arbitration provision at issue is void pursuant to NRS 597.995.

10 Dated: March 7, 2018.

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12 Nancy L. Aho  
13 District Court Judge  
14 *AL*

15 Respectfully Submitted By,

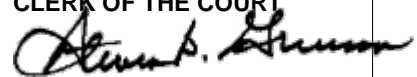
16 **BLACK & LOBELLO**

17   
18 Maximiliano D. Couvillier III, Esq., Bar #7661  
19 [mcouvillier@blacklobello.law](mailto:mcouvillier@blacklobello.law)  
20 Attorneys for Defendant MMAWC, L.L.C.

21  
22 Approved to Form and Content,

23 **LAW OFFICE OF BYRON THOMAS**

24  
25 DECLINED  
26 Byron Thomas, Esq., Bar #8906  
27 [byronthomaslaw@gmail.com](mailto:byronthomaslaw@gmail.com)  
28 Attorneys for Plaintiffs



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[mcouvillier@blacklobello.law](mailto:mcouvillier@blacklobello.law)

*Attorneys for Defendants MMAWC, L.L.C*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

ZION WOOD OBI WAN TRUST, and SHAWN  
WRIGHT as trustee of ZION WOOD OBI WAN  
TRUST; WSOF GLOBAL, LLC, a Wyoming  
limited liability company,

Plaintiff,

v.

MMAWC, LLC d/b/a WORLD SERIES OF  
FIGHTING a Nevada limited liability company;  
MMAX INVESTMENT PARTNERS, INC. dba  
PROFESSIONAL FIGHTERS LEAGUE, a  
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PARTNERSHIP LLLP, a Colorado limited  
liability partnership; KEITH REDMOND, an  
individual; DOES I through X, inclusive; and  
ROE Corporations XX through XXX, inclusive,

Defendants

CASE NO.: A-17-764118-C  
DEPT. NO.: 27

**AMENDED NOTICE OF ENTRY OF  
ORDER RE: MMAWC, LLC's MOTION  
TO DISMISS AND TO COMPEL  
ARBITRATION**

PLEASE TAKE NOTICE that a ORDER RE: MMAWC, LLC's MOTION TO DISMISS AND

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4 Dated this 14<sup>th</sup> day of March 2018.

5 **BLACK & LOBELLO**

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7 /s/ Maximiliano D. Couvillier III, Esq.  
8 Maximiliano D. Couvillier III, Esq. SBN 7661  
9 [mcouvillier@blacklobello.law](mailto:mcouvillier@blacklobello.law)  
10 Attorneys for Defendants

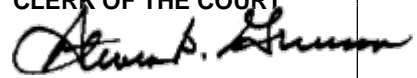
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14 **ARBITRATION** using the Court's electronic filing and service system, which provides service  
15 to the following users:

16 **LAW OFFICE OF BYRON THOMAS**

17 Bryon Thomas, Esq., Bar #8906  
18 [Byronthomaslaw@gmail.com](mailto:Byronthomaslaw@gmail.com)  
19 Attorney for Plaintiff

20  
21 /s/ Mariella Dumbrique  
22 An Employee of Black & LoBello  
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28



**ORDR**  
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*Attorneys for Defendant MMAWC L.L.C.*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

ZION WOOD OBI WAN TRUST and SHAWN  
WRIGHT as trustee of ZION WOOD OBI WAN  
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limited liability company,

Plaintiffs,

v.

MMAWC, LLC d/b/a WORLD SERIES OF  
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CASE NO.: A-17-764118-C  
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10 Dated: March 7, 2018.

11  
12 Nancy L. Hill  
13 District Court Judge  
14 *AL*

15 Respectfully Submitted By,

16 **BLACK & LOBELLO**

17   
18 Maximiliano D. Couvillier III, Esq., Bar #7661  
19 [mcouvillier@blacklobello.law](mailto:mcouvillier@blacklobello.law)  
20 Attorneys for Defendant MMAWC, L.L.C.

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22 Approved to Form and Content,

23 **LAW OFFICE OF BYRON THOMAS**

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26 Byron Thomas, Esq., Bar #8906  
27 [byronthomaslaw@gmail.com](mailto:byronthomaslaw@gmail.com)  
28 Attorneys for Plaintiffs

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Civil Matters**

**COURT MINUTES**

**February 21, 2018**

---

A-17-764118-C      Zion Wood Obi Wan Trust, Plaintiff(s)  
vs.  
MMAWC LLC, Defendant(s)

---

**February 21, 2018      10:00 AM      Motion to Dismiss**

**HEARD BY:** Allf, Nancy      **COURTROOM:** RJC Courtroom 03A

**COURT CLERK:** Nicole McDevitt

**RECORDER:** Brynn Griffiths

**REPORTER:**

**PARTIES**

**PRESENT:**      Couvillier III, Maximiliano D.      Attorney  
                 Thomas, Byron E.      Attorney

**JOURNAL ENTRIES**

- Arguments by counsel regarding the merits of and opposition to the pending motion. Court stated its findings and ORDERED, Motion to Dismiss Complaint and to Compel Arbitration GRANTED IN PART as to civil rico, Court will have thirty days after entry of order to amend, or leave the complaint as is and seek later to amend after discovery is taken; motion DENIED IN PART in all other respects. Mr. Couviller to prepare the order and submit it to opposing counsel for approval.

# Certification of Copy

**State of Nevada**  
**County of Clark** } **SS:**

I, Steven D. Grierson, the Clerk of the Court of the Eighth Judicial District Court, Clark County, State of Nevada, does hereby certify that the foregoing is a true, full and correct copy of the hereinafter stated original document(s):

NOTICE OF APPEAL BY DEFENDANTS MMAWC, LLC, BRUCE DEIFIK & THE NANCY AND BRUCE DEIFIK FAMILY PARTNERSHIP LLLP; CASE APPEAL STATEMENT BY DEFENDANTS MMAC, LLC, BRUCE DEIFIK & THE NANCY AND BRUCE DEIFIK FAMILY PARTNERSHIP LLLP; NOTICE OF POSTING BOND ON APPEAL BY DEFENDANTS MMAWC, LLC, BRUCE DEIFIK & THE NANCY AND BRUCE DEIFIK FAMILY PARTNERSHIP LLLP; DISTRICT COURT DOCKET ENTRIES; CIVIL COVER SHEET; ORDER RE: MMAWC, LLC'S MOTION TO DISMISS AND TO COMPEL ARBITRATION; NOTICE OF ENTRY OF ORDER RE: MMAWC, LLC'S MOTION TO DISMISS AND TO COMPEL ARBITRATION; AMENDED NOTICE OF ENTRY OF ORDER RE: MMAWC, LLC'S MOTION TO DISMISS AND TO COMPEL ARBITRATION; DISTRICT COURT MINUTES

ZION WOOD OBI WAN TRUST; SHAWN  
WRIGHT as trustee of ZION WOOD OBI WAN  
TRUST; WSOF GLOBAL, LLC,

Plaintiff(s),

vs.

MMAWC, LLC dba WORLD SERIES OF  
FIGHTING; MMAX INVESTMENT  
PARTNERS, INC. dba PROFESSIONAL  
FIGHTERS LEAGUE; BRUCE DEIFIK;  
CARLOS SILVA; NANCY AND BRUCE  
DEIFIK FAMILY PARTNERSHIP LLLP;  
KEITH REDMOND,

Defendant(s),

Case No: A-17-764118-C

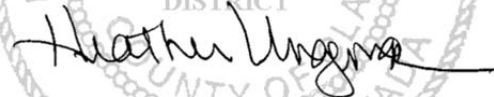
Dept No: XXVII

now on file and of record in this office.



**IN WITNESS THEREOF**, I have hereunto  
Set my hand and Affixed the seal of the  
Court at my office, Las Vegas, Nevada  
This 13 day of April 2018.

Steven D. Grierson, Clerk of the Court

A handwritten signature in black ink, reading "Heather Ungermann", is written over a faint, circular court seal. The seal contains the text "UNITED STATES DISTRICT COURT OF THE EIGHTH JUDICIAL DISTRICT CLARK COUNTY OF NEVADA".

---

Heather Ungermann, Deputy Clerk  
A-17-764118-C

Christopher Childs, Chtd.  
901 N. Green Valley Parkway, #150  
Henderson, NV 89074

Nevada State Bank  
P.O. Box 990  
Las Vegas, Nevada 89125  
94-77/1224

0349

4/11/2018

PAY TO THE  
ORDER OF

Clerk of the Nevada Supreme Court

\$ \*\*250.00

Two Hundred Fifty and 00/100\*\*\*\*\*

DOLLARS

Clerk of the Nevada Supreme Court

MEMO

Deifik/WSOF Filing fees



AUTHORIZED SIGNATURE

⑈000349⑈ ⑆122400779⑆904202736⑈

Details on Back  
Security Features Included