

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

ZION WOOD OBI WAN TRUST  
AND SHAWN WRIGHT AS  
TRUSTEE OF THE ZION WOOD OBI  
WAN TRUST

Appellant

vs.

MMAWC, LLC d/b/a WORLD  
SERIES OF FIGHTING a Nevada  
Limited Liability Company; MMA  
INVESTMENT PARTNERS d/b/a  
PROFESSIONAL FIGHTERS  
LEAGUE; NANCY and BRUCE  
DEIFIK FAMILY PARTNERSHIP,  
LLP., a Colorado limited liability  
partnership

Respondents

**Supreme Court Case No:**

**85051**

**District Court Case No:**

**A-17-764118-C**

**APPEAL**

From the Eighth Judicial District Court

Department I

Clark County Nevada

HONORABLE NANCY ALF

APPELLANTS' APPENDIX VOL 5

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LAW OFFICES OF BYRON THOMAS

BYRON THOMAS, ESQ.

BAR NO: 8906

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(2) Granting in Part and Denying in Part Plaintiffs' Countermotion for Leave			
<p>Notice of Entry of Order</p> <p>(1) Granting in Part and Denying in part Defendant MMAX Motion to Quash Service of Process and to Dismiss Pursuant NRCP 4(i); and</p> <p>(2) Granting in Part and Denying in Part Countermotion to Enlarge Time for Service</p>	11/19/2018	AA353-357	III
<p>Notice of Entry of Order Granting MMAWC and MMAX's Joint Motion to Confirm Arbitration Awards</p>	6/14/2022	AA634-638	V
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<p>Notice of Entry of Order Dismissing Action Without Prejudice</p>	10/23/2019	AA509-514	IV
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Order  (1) Granting in Part and Denying in part Defendant MMAX Motion to Quash Service of Process and to Dismiss Pursuant NRC 4(i); and  (2) Granting in Part and Denying in Part Countermotion to Enlarge Time for Service	11/19/2018	AA342-343 and AA346-347	III
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Transcript of Hearing	02/21/2018	AA198 – AA204	I

*Heather S. Jensen*  
CLERK OF THE COURT

**ORDR**

**KENNEDY & COUVILLIER, PLLC**

Maximiliano D. Couvillier III, Esq. (Bar No. 7661)

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*Attorneys for Defendants MMAWC, LLC and the Deifik Family Partnership LLLP*

**DICKINSON WRIGHT PLLC**

Michael N. Feder, Esq. (Bar No. 7332)

Gabriel A. Blumberg, Esq. (Bar No. 12332)

3883 Howard Hughes Parkway, Suite 800

Las Vegas, Nevada 89169-0965

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[MFeder@dickinsonwright.com](mailto:MFeder@dickinsonwright.com)

[Blumberg@dickinsonwright.com](mailto:Blumberg@dickinsonwright.com)

*Attorneys for MMAX Investment Partners, Inc., now known as Professional Fighters League, LLC*

**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

**ORDER GRANTING MMAWC AND  
MMAX'S JOINT MOTION TO  
CONFIRM ARBITRATION AWARDS**

On June 8, 2022, the Court heard the Joint Motion to Reopen this Matter and to Confirm Arbitration Awards in Favor of Defendants and for Judgment Thereon ("Motion") filed by

defendants MMAWC, LLC ("MMAWC"), The Nancy And Bruce Deifik Family Partnership LLLP ("DFP") and MMAX Investment Partners, Inc. now known as Professional Fighters League, LLC ("PFL"). Maximiliano D. Couvillier III, Esq. appeared on behalf of defendants MMAWC and DFP. Michael N. Feder, Esq. appeared on behalf of MMAX. Byron Thomas, Esq. appeared on behalf of the plaintiffs Zion Obi Wan Trust ("Zion") and its trustee Shawn Wright ("Wright")(together Zion and Wright, "Plaintiffs").

The Court has considered the Motion, all related briefs and exhibits, the Court's record, and the argument of counsel. For good cause appearing,

**IT IS HEREBY ORDERED** that the Motion is **GRANTED** in all respects. The Court concludes that: (a) no manifest error or injustice exist with respect to the June 25, 2021 Summary Judgment Award ("06/25/21 Award") and October 4, 2021 Fees and Costs Award ("10/4/21 Award") entered in the subject America Arbitration Association arbitration ("Arbitration"); (b) the 06/25/21 Award and 10/24/21 Award are not arbitrary or capricious; and (c) the Arbitrator did not manifestly disregard the law with respect to the 06/25/21 Award or the 10/24/21 Award.

**IT IS FUTHER ORDERED** that the 06/25/21 Award and 10/24/21 Award are hereby confirmed, and judgment shall be entered thereon in favor of MMAWC and DFP in the amount of \$43,687.20 and in favor of PFL in the amount \$49,320.90.

**IT IS SO ORDERED.**

Dated this 13th day of June, 2022

Nancy L Alf  
District Court Judge  
Dated: \_\_\_\_\_ TW  
828 4A7 8DFD 50C4  
Nancy Alf  
District Court Judge

**Respectfully Submitted By,**

/s/Maximiliano D. Couvillier III

KENNEDY & COUVILLIER, PLLC

Maximiliano D. Couvillier III, Esq., (Bar No. 7661)

Attorneys for Defendants MMAWC, LLC and Deifik Family Partnership LLLP

/s/Michael N. Feder

DICKINSON WRIGHT, PLLC

Michael N. Feder, Esq. (Bar No. 7332)

Attorneys for Defendant MMAX Investment Partners, Inc., now known as Professional Fighters League, LLC

1 Approved As To Form And Content,

2 /s/Byron Thomas

3 Byron Thomas, Esq. (Bar 8906)

4 Attorney for Plaintiffs

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**From:** [Michael N. Feder](#)  
**To:** [Max Couvillier](#)  
**Cc:** [Byron Thomas](#); [Gabriel A. Blumberg](#); [Dianne M. Kelling](#)  
**Subject:** Re: EXTERNAL: Zion  
**Date:** Wednesday, June 8, 2022 2:35:54 PM

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You have approval to affix my e-signature.

Thank you  
Michael

Sent from my iPhone please excuse any typos

On Jun 8, 2022, at 2:32 PM, Max Couvillier <[mcouvillier@kclawnv.com](mailto:mcouvillier@kclawnv.com)> wrote:

Attached is the proposed order regarding the joint motion to reopen action and to confirm arbitration award.  
Please let me know if I have your consent to affix your electronic signature and submit

Due to my schedule, I intend to submit by 10am Friday June 10.

Thanks

Maximiliano D. Couvillier III, Esq.  
KENNEDY & COUVILLIER, PLLC  
3271 E Warm Springs Rd.  
Las Vegas, NV 89120  
702 605-3440  
[mcouvillier@kclawnv.com](mailto:mcouvillier@kclawnv.com)  
[www.kclawnv.com](http://www.kclawnv.com)

<Order Confirm ARB Awards June 2022[1].doc>

#### Michael N. Feder Member

3883 Howard Hughes Parkway Phone 702-550-4440  
Suite 800 Fax 844-670-6009  
Las Vegas NV 89169 Email [MFeder@dickinsonwright.com](mailto:MFeder@dickinsonwright.com)

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**DICKINSON WRIGHT**<sup>®</sup> LLP

ARIZONA CALIFORNIA FLORIDA ILLINOIS INDIANA KENTUCKY MICHIGAN NEVADA OHIO  
PENNSYLVANIA TEXAS VIRGINIA WASHINGTON WISCONSIN

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**From:** White, Terrance  
**To:** "Byron Thomas"  
**Cc:** Max Couvillier; Michael Feder; Gabriel A. Blumberg  
**Subject:** RE: Eighth Judicial District Court - Proposed Order Returned  
**Date:** Friday, June 10, 2022 12:01:26 PM

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Understandable; Mr. Couvillier, please resend the order with Mr. Thomas's signature.



**Terrance White JD, MBA, LLM**  
Law Clerk  
to the Honorable Nancy L. Alf  
Eighth Judicial District Court | Department 27  
Regional Justice Center Courtroom 16A  
Phone: (702) 671-0884  
Email: [Dept27LC@clarkcountycourts.us](mailto:Dept27LC@clarkcountycourts.us)

**From:** Byron Thomas [mailto:byronthomaslaw@gmail.com]  
**Sent:** Friday, June 10, 2022 11:47 AM  
**To:** White, Terrance  
**Cc:** Max Couvillier; Michael Feder; Gabriel A. Blumberg  
**Subject:** Re: Eighth Judicial District Court - Proposed Order Returned

[NOTICE: This message originated outside of Eighth Judicial District Court -- DO NOT CLICK on links or open attachments unless you are sure the content is safe.]

Mr. Couvillier provided the proposed order at 2:30pm on Wednesday and imposed an arbitrary deadline of 10 am Friday, which did not even give a full two days to respond. I wanted to double check the numbers in the order, but I was swamped yesterday and I intended to get back to this today. At no point did I refuse to sign.

I approve it as to form in that the proposed order correctly states the Court's oral decision.

On Fri, Jun 10, 2022 at 11:00 AM White, Terrance <[Dept27LC@clarkcountycourts.us](mailto:Dept27LC@clarkcountycourts.us)> wrote:

Mr. Thomas,

If you not approve of the order, please either send me a competing order or file an objection.



**Terrance White JD, MBA, LLM**  
Law Clerk  
to the Honorable Nancy L. Alf  
Eighth Judicial District Court | Department 27  
Regional Justice Center Courtroom 16A  
Phone: (702) 671-0884  
Email: [Dept27LC@clarkcountycourts.us](mailto:Dept27LC@clarkcountycourts.us)

---

**From:** Max Couvillier [mailto:[mcouvillier@kclawnv.com](mailto:mcouvillier@kclawnv.com)]  
**Sent:** Friday, June 10, 2022 10:54 AM  
**To:** White, Terrance; Michael Feder; Gabriel A. Blumberg; Byron Thomas  
**Subject:** Fwd: Eighth Judicial District Court - Proposed Order Returned

[NOTICE: This message originated outside of Eighth Judicial District Court -- DO NOT CLICK on links or open attachments unless you are sure the content is safe.]

Zion's counsel refused to sign the order granting joint motion to confirm arbitration awards. Did not contact us with any objections. Did not contact us at all. We don't know what else to do to comply with the generic message below.

We know that Zion's counsel received the proposed order granting joint motion to confirm arbitration awards because he responded to the proposed order regarding the related joint motion to seal.

Maximiliano D. Couvillier III, Esq.  
KENNEDY & COUVILLIER  
3271 E. Warm Springs Rd.  
Las Vegas, Nevada 89120  
Office: 702-605-3440  
Direct: 702-608-4975  
[mcouvillier@kclawnv.com](mailto:mcouvillier@kclawnv.com)  
[www.kclawnv.com](http://www.kclawnv.com)

Please forgive typos, sent via I-phone

Begin forwarded message:

From: NoReply@clarkcountycourts.us  
Date: June 10, 2022 at 10:26:17 AM PDT  
To: Max Couvillier <[mcouvillier@kclawnv.com](mailto:mcouvillier@kclawnv.com)>  
Subject: Eighth Judicial District Court - Proposed Order Returned

Zion Wood v. MMAWC et al, Case No. A-17-764118-C

Your proposed order or document requiring a judge's signature to the court has been returned for the following reason(s): All Parties must sign and approve the Order. If Parties object to the Order, they can file an Objection on the record or redlining the Proposed Order. Please email the law clerk at [Dept27LC@clarkcountycourts.us](mailto:Dept27LC@clarkcountycourts.us) to inform them this is a CO. Also, include a word version of the Order, hearing transcript, and the objection/redlining of the Order for the Court's consideration.



1 CSERV

2 DISTRICT COURT  
3 CLARK COUNTY, NEVADA  
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6 Zion Wood Obi Wan Trust,  
Plaintiff(s)

CASE NO: A-17-764118-C

7 vs.  
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DEPT. NO. Department 27

9 MMAWC LLC, Defendant(s)

10  
11 **AUTOMATED CERTIFICATE OF SERVICE**

12 This automated certificate of service was generated by the Eighth Judicial District  
13 Court. The foregoing Order Granting Motion was served via the court's electronic eFile  
system to all recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 6/13/2022

15 Michael Feder

mfeder@dickinsonwright.com

16 Gabriel Blumberg

gblumberg@dickinsonwright.com

17 Docket Clerk - LV Litigation

LV\_LitDocket@dickinsonwright.com

18 byron Thomas

Byronthomaslaw@gmail.com

19 Byron Thomas

Byronthomaslaw@gmail.com

20 Maximiliano Couvillier

mcouvillier@kclawnv.com

21 Todd Kennedy

tkennedy@kclawnv.com

22 Paul Haire

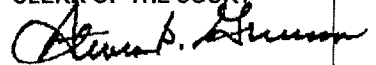
paul.m.haire@gmail.com

23 Dianne Kelling

DKelling@dickinsonwright.com

24 Traci Burns

tburns@dickinsonwright.com



1 **NEOJ**  
2 **DICKINSON WRIGHT PLLC**  
3 Michael N. Feder  
4 Nevada Bar No. 7332  
5 Email: [mfeder@dickinson-wright.com](mailto:mfeder@dickinson-wright.com)  
6 Gabriel A. Blumberg  
7 Nevada Bar No. 12332  
8 Email: [gblumberg@dickinson-wright.com](mailto:gblumberg@dickinson-wright.com)  
9 3883 Howard Hughes Parkway, Suite 800  
10 Las Vegas, Nevada 89169  
11 Tel: (702) 550-4400  
12 Fax: (844) 670-6009

13 *Attorneys for Defendant*  
14 *MMAV Investment Partners, Inc.*  
15 *dba Professional Fighters League*

16 **DISTRICT COURT**  
17 **CLARK COUNTY, NEVADA**

18 ZION WOOD OBI WAN TRUST and SHAWN  
19 WRIGHT as trustee of ZION WOOD OBI WAN  
20 TRUST; WSOB GLOBAL, LLC, a Wyoming  
21 limited liability company,

22 Plaintiff,

23 vs.

24 MMAWC, LLC d/b/a WORLD SERIES OF  
25 FIGHTING a Nevada limited liability company;  
26 MMAV INVESTMENT PARTNERS, INC. dba  
27 PROFESSIONAL FIGHTERS LEAGUE, a  
28 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

DEPT. XXVII

**NOTICE OF ENTRY OF ORDER  
GRANTING MMAWC AND MMAV'S  
JOINT MOTION TO CONFIRM  
ARBITRATION AWARDS**

DICKINSON WRIGHT PLLC  
3883 Howard Hughes Parkway, Suite 800  
Las Vegas, Nevada 891

1 PLEASE TAKE NOTICE that on the 13<sup>th</sup> day of June, 2022, an Order Granting  
2 MMAWC and MMAX'S Joint Motion to Confirm Arbitration Awards was entered by the Court.  
3 A copy of said Order is attached hereto as **Exhibit 1**.

4 Dated: this 14<sup>th</sup> day of June, 2022.

5 **DICKINSON WRIGHT PLLC**

6  
7 /s/ Michael N. Feder  
8 MICHAEL N. FEDER  
9 Nevada Bar No. 7332  
mfeder@dickinson-wright.com  
10 GABRIEL A. BLUMBERG  
11 Nevada Bar No. 12332  
gblumberg@dickinson-wright.com  
12 3883 Howard Hughes Parkway, Suite 800  
13 Las Vegas, Nevada 89169

14 *Attorneys for MMAX Investment Partners,*  
15 *Inc. dba Professional Fighters League*  
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**CERTIFICATE OF SERVICE**

The undersigned, an employee of Dickinson Wright PLLC, hereby certifies that on the 14<sup>th</sup> day of June 2022, she caused a copy of the foregoing **NOTICE OF ENTRY OF ORDER GRANTING MMAWC AND MMAX'S JOINT MOTION TO CONFIRM ARBITRATION AWARDS** to be transmitted by electronic service in accordance with Administrative Order 14.2, to all interested parties, through the Court's Odyssey E-File & Serve system addressed to:

Byron E. Thomas, Esq.  
3275 South Jones Boulevard, Suite 104  
Las Vegas, NV 89146  
Email: [byronthomaslaw@gmail.com](mailto:byronthomaslaw@gmail.com)

*Attorney for Plaintiff*

Maximiliano D. Couvillier III  
KENNEDY & COUVILLIER, PLLC  
3271 East Warm Springs Road  
Las Vegas, NV 89120  
Email: [mcouvillier@kclawnv.com](mailto:mcouvillier@kclawnv.com)

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

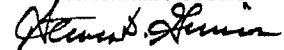
/s/: Dianne M. Kelling

An Employee of DICKINSON WRIGHT PLLC

EXHIBIT INDEX

Exhibit No.	Description	No. of Pages (Exclusive of Exhibit Sheet)
1	Order Granting MMAWC and MMAX'S Joint Motion to Confirm Arbitration Awards	7

# EXHIBIT 1

  
CLERK OF THE COURT

**ORDR**

**KENNEDY & COUVILLIER, PLLC**

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*Attorneys for Defendants MMAWC, LLC and the Deifik Family Partnership LLLP*

**DICKINSON WRIGHT PLLC**

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[MFeder@dickinsonwright.com](mailto:MFeder@dickinsonwright.com)  
[Blumberg@dickinsonwright.com](mailto:Blumberg@dickinsonwright.com)

*Attorneys for MMAX Investment Partners, Inc., now known as Professional Fighters League, LLC*

**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

**ORDER GRANTING MMAWC AND  
MMAX'S JOINT MOTION TO  
CONFIRM ARBITRATION AWARDS**

On June 8, 2022, the Court heard the Joint Motion to Reopen this Matter and to Confirm  
Arbitration Awards in Favor of Defendants and for Judgment Thereon ("Motion") filed by

1 defendants MMAWC, LLC ("MMAWC"), The Nancy And Bruce Deifik Family Partnership  
2 LLLP ("DFP") and MMAX Investment Partners, Inc. now known as Professional Fighters  
3 League, LLC ("PFL"). Maximiliano D. Couvillier III, Esq. appeared on behalf of defendants  
4 MMAWC and DFP. Michael N. Feder, Esq. appeared on behalf of MMAX. Byron Thomas,  
5 Esq. appeared on behalf of the plaintiffs Zion Obi Wan Trust ("Zion") and its trustee Shawn  
6 Wright ("Wright")(together Zion and Wright, "Plaintiffs").

7 The Court has considered the Motion, all related briefs and exhibits, the Court's record,  
8 and the argument of counsel. For good cause appearing,

9 **IT IS HEREBY ORDERED** that the Motion is **GRANTED** in all respects. The Court  
10 concludes that: (a) no manifest error or injustice exist with respect to the June 25, 2021 Summary  
11 Judgment Award ("06/25/21 Award") and October 4, 2021 Fees and Costs Award ("10/4/21  
12 Award") entered in the subject America Arbitration Association arbitration ("Arbitration"); (b)  
13 the 06/25/21 Award and 10/24/21 Award are not arbitrary or capricious; and (c) the Arbitrator  
14 did not manifestly disregard the law with respect to the 06/25/21 Award or the 10/24/21 Award.

15 **IT IS FUTHER ORDERED** that the 06/25/21 Award and 10/24/21 Award are hereby  
16 confirmed, and judgment shall be entered thereon in favor of MMAWC and DFP in the amount  
17 of \$43,687.20 and in favor of PFL in the amount \$49,320.90.

18 **IT IS SO ORDERED.**

19 Dated this 13th day of June, 2022

20 Nancy L Allf  
District Court Judge  
Dated: \_\_\_\_\_ TW  
828 4A7 8DFD 50C4  
Nancy Allf  
District Court Judge

21  
22 **Respectfully Submitted By,**

23 /s/Maximiliano D. Couvillier III  
24 KENNEDY & COUVILLIER, PLLC  
25 Maximiliano D. Couvillier III, Esq., (Bar No. 7661)  
Attorneys for Defendants MMAWC, LLC and Deifik Family Partnership LLLP

26 /s/Michael N. Feder  
27 DICKINSON WRIGHT, PLLC  
Michael N. Feder, Esq. (Bar No. 7332)  
28 Attorneys for Defendant MMAX Investment Partners, Inc., now known as  
Professional Fighters League, LLC



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**Approved As To Form And Content,**

/s/Byron Thomas

Byron Thomas, Esq. (Bar 8906)

*Attorney for Plaintiffs*

**From:** [Michael N. Feder](#)  
**To:** [Max Couvillier](#)  
**Cc:** [Byron Thomas](#); [Gabriel A. Blumberg](#); [Dianne M. Kelling](#)  
**Subject:** Re: EXTERNAL: Zion  
**Date:** Wednesday, June 8, 2022 2:35:54 PM

---

You have approval to affix my e-signature.

Thank you  
Michael

Sent from my iPhone please excuse any typos

On Jun 8, 2022, at 2:32 PM, Max Couvillier <[mcouvillier@kclawnv.com](mailto:mcouvillier@kclawnv.com)> wrote:

Attached is the proposed order regarding the joint motion to reopen action and to confirm arbitration award.  
Please let me know if I have your consent to affix your electronic signature and submit

Due to my schedule, I intend to submit by 10am Friday June 10.

Thanks

Maximiliano D. Couvillier III, Esq.  
KENNEDY & COUVILLIER, PLLC  
3271 E Warm Springs Rd.  
Las Vegas, NV 89120  
702 605-3440  
[mcouvillier@kclawnv.com](mailto:mcouvillier@kclawnv.com)  
[www.kclawnv.com](http://www.kclawnv.com)

<Order Confirm ARB Awards June 2022[1].doc>

#### **Michael N. Feder Member**

3883 Howard Hughes Parkway Phone 702-550-4440  
Suite 800 Fax 844-670-6009  
Las Vegas NV 89169 Email [MFeder@dickinsonwright.com](mailto:MFeder@dickinsonwright.com)

[Profile](#) [V-Card](#)

---

**DICKINSON WRIGHT**

ARIZONA CALIFORNIA FLORIDA KENTUCKY MICHIGAN NEVADA OHIO  
TENNESSEE TEXAS WASHINGTON DISTRICT OF COLUMBIA

---

**From:** White, Terrance  
**To:** "Byron Thomas"  
**Cc:** Max Couvillier; Michael Feder; Gabriel A. Blumberg  
**Subject:** RE: Eighth Judicial District Court - Proposed Order Returned  
**Date:** Friday, June 10, 2022 12:01:26 PM

---

Understandable; Mr. Couvillier, please resend the order with Mr. Thomas's signature.



**Terrance White JD, MBA, LLM**  
Law Clerk  
to the Honorable Nancy L. Alf  
Eighth Judicial District Court | Department 27  
Regional Justice Center Courtroom 16A  
Phone: (702) 671-0884  
Email: [Dept27LC@clarkcountycourts.us](mailto:Dept27LC@clarkcountycourts.us)

**From:** Byron Thomas [mailto:byronthomaslaw@gmail.com]  
**Sent:** Friday, June 10, 2022 11:47 AM  
**To:** White, Terrance  
**Cc:** Max Couvillier; Michael Feder; Gabriel A. Blumberg  
**Subject:** Re: Eighth Judicial District Court - Proposed Order Returned

[NOTICE: This message originated outside of Eighth Judicial District Court -- DO NOT CLICK on links or open attachments unless you are sure the content is safe.]

Mr. Couvillier provided the proposed order at 2:30pm on Wednesday and imposed an arbitrary deadline of 10 am Friday, which did not even give a full two days to respond. I wanted to double check the numbers in the order, but I was swamped yesterday and I intended to get back to this today. At no point did I refuse to sign.

I approve it as to form in that the proposed order correctly states the Court's oral decision.

On Fri, Jun 10, 2022 at 11:00 AM White, Terrance <[Dept27LC@clarkcountycourts.us](mailto:Dept27LC@clarkcountycourts.us)> wrote:

Mr. Thomas,

If you not approve of the order, please either send me a competing order or file an objection.



**Terrance White JD, MBA, LLM**  
Law Clerk  
to the Honorable Nancy L. Alf  
Eighth Judicial District Court | Department 27  
Regional Justice Center Courtroom 16A  
Phone: (702) 671-0884  
Email: [Dept27LC@clarkcountycourts.us](mailto:Dept27LC@clarkcountycourts.us)

---

**From:** Max Couvillier [mailto:[mcouvillier@kclawnv.com](mailto:mcouvillier@kclawnv.com)]  
**Sent:** Friday, June 10, 2022 10:54 AM  
**To:** White, Terrance; Michael Feder; Gabriel A. Blumberg; Byron Thomas  
**Subject:** Fwd: Eighth Judicial District Court - Proposed Order Returned

[NOTICE: This message originated outside of Eighth Judicial District Court -- DO NOT CLICK on links or open attachments unless you are sure the content is safe.]

Zion's counsel refused to sign the order granting joint motion to confirm arbitration awards. Did not contact us with any objections. Did not contact us at all. We don't know what else to do to comply with the generic message below.

We know that Zion's counsel received the proposed order granting joint motion to confirm arbitration awards because he responded to the proposed order regarding the related joint motion to seal.

Maximiliano D. Couvillier III, Esq.  
KENNEDY & COUVILLIER  
3271 E. Warm Springs Rd.  
Las Vegas, Nevada 89120  
Office: 702-605-3440  
Direct: 702-608-4975  
[mcouvillier@kclawnv.com](mailto:mcouvillier@kclawnv.com)  
[www.kclawnv.com](http://www.kclawnv.com)

Please forgive typos, sent via I-phone

Begin forwarded message:

From: [NoReply@clarkcountycourts.us](mailto:NoReply@clarkcountycourts.us)  
Date: June 10, 2022 at 10:26:17 AM PDT  
To: Max Couvillier <[mcouvillier@kclawnv.com](mailto:mcouvillier@kclawnv.com)>  
Subject: Eighth Judicial District Court - Proposed Order Returned

Zion Wood v. MMAWC et al, Case No. A-17-764118-C

Your proposed order or document requiring a judge's signature to the court has been returned for the following reason(s): All Parties must sign and approve the Order. If Parties object to the Order, they can file an Objection on the record or redlining the Proposed Order. Please email the law clerk at [Dept27LC@clarkcountycourts.us](mailto:Dept27LC@clarkcountycourts.us) to inform them this is a CO. Also, include a word version of the Order, hearing transcript, and the objection/redlining of the Order for the Court's consideration.

1 CSERV

2  
3 DISTRICT COURT  
4 CLARK COUNTY, NEVADA

5  
6 Zion Wood Obi Wan Trust,  
7 Plaintiff(s)

CASE NO: A-17-764118-C

8 vs.

DEPT. NO. Department 27

9 MMAWC LLC, Defendant(s)

10  
11 **AUTOMATED CERTIFICATE OF SERVICE**

12 This automated certificate of service was generated by the Eighth Judicial District  
13 Court. The foregoing Order Granting Motion was served via the court's electronic eFile  
14 system to all recipients registered for e-Service on the above entitled case as listed below:

15 Service Date: 6/13/2022

16 Michael Feder

mfeder@dickinsonwright.com

17 Gabriel Blumberg

gblumberg@dickinsonwright.com

18 Docket Clerk - LV Litigation

LV\_LitDocket@dickinsonwright.com

19 byron Thomas

Byronthomaslaw@gmail.com

20 Byron Thomas

Byronthomaslaw@gmail.com

21 Maximiliano Couvillier

mcouvillier@kclawnv.com

22 Todd Kennedy

tkennedy@kclawnv.com

23 Paul Haire

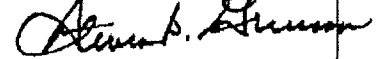
paul.m.haire@gmail.com

24 Dianne Kelling

DKelling@dickinsonwright.com

25 Traci Burns

tburns@dickinsonwright.com



**MATF**  
DICKINSON WRIGHT PLLC  
Michael N. Feder  
Nevada Bar No. 7332  
Email: [mfeder@dickinson-wright.com](mailto:mfeder@dickinson-wright.com)  
Gabriel A. Blumberg  
Nevada Bar No. 12332  
Email: [gblumberg@dickinson-wright.com](mailto:gblumberg@dickinson-wright.com)  
3883 Howard Hughes Parkway, Suite 800  
Las Vegas, Nevada 89169  
Tel: (702) 550-4400  
Fax: (844) 670-6009

*Attorneys for Defendant*  
*MMAX Investment Partners, Inc.*  
*dba Professional Fighters League*

**KENNEDY & COUVILLIER, PLLC**  
Maximiliano D. Couvillier III, Esq. (NV Bar No. 7661)  
3271 E. Warm Springs Rd.  
Las Vegas, Nevada 89120  
Ph. (702) 605-3440  
Fax (702) 625-6367  
[mcouvillier@kclawnv.com](mailto:mcouvillier@kclawnv.com)  
*Attorneys for Defendants MMAWC, LLC 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,

Plaintiff,

vs.

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

DEPT. XXVII

**JOINT MOTION FOR ATTORNEYS'**  
**FEES PER NRS 38.243**

**(Hearing Requested)**

Pursuant to the Nevada Uniform Arbitration Act at NRS 38.243, defendants MMAWC, LLC (“MMAWC”), The Nancy And Bruce Deifik Family Partnership LLLP (“DFP”) and MMAX Investment Partners, Inc. dba Professional Fighters League (“MMAX”),<sup>1</sup> by and through their respective counsel, jointly move for an award of reasonable attorneys’ fees and costs incurred in connection with the proceedings to confirm the arbitration awards in their favor issued by the American Arbitration Association (“AAA”).

This Motion is made and based upon the Memorandum of Points and Authorities below, the Court’s record, and any argument of counsel the Court may consider.

Dated: July 1, 2022.

**KENNEDY & COUVILLIER, PLLC**

/s/Maximiliano D. Couvillier III

Maximiliano D. Couvillier III, Esq. (NBN 7661)

[mcouvillier@kclawnv.com](mailto:mcouvillier@kclawnv.com)

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

**DICKINSON WRIGHT PLLC**

/s/Michael N. Feder

Michael N. Feder (NBN. 7332)

[MFeder@dickinsonwright.com](mailto:MFeder@dickinsonwright.com)

Gabriel A. Blumberg (NBN. 12332)

[GBlumberg@dickinsonwright.com](mailto:GBlumberg@dickinsonwright.com)

*Attorneys for MMAX Investment Partners, Inc. dba Professional Fighters League*

<sup>1</sup> MMAX is now known as Professional Fighters League, LLC.

**MEMORANDUM OF POINTS & AUTHORITIES**

**I. FACTS**

On April 4, 2022, MMAWC, DFP and MMAX filed a joint motion ("Joint Motion") (Doc ID# 99) per NRS 38.239 to confirm the arbitration awards in their favor issued by the AAA on June 25, 2021 and October 4, 2021 ("Arbitration Awards"). Plaintiffs Zion Obi Wan Trust ("Zion") and its trustee Shawn Wright ("Wright") contested confirmation and filed an opposition on April 28, 2022 (Doc ID# 102), seeking to vacate or modify those Arbitration Awards.

MMAWC, DFP and MMAX filed their joint reply on May 6, 2022 (Doc ID#104). The Court heard the joint motion on June 8, 2022, and, on June 13, 2022, the Court entered an order (Doc ID #109) granting the joint motion and confirming the Arbitration Awards in favor of MMAWC, DFP and MMAX. The notice of entry of order was filed and served on June 14, 2022 (Doc ID# 110).

**A. Reasonable Fees and Costs Incurred By MMAWC & DFP**

To date, MMAWC and DFP have incurred \$4,500.00 in reasonable attorneys' fees and \$3.50 in reasonable costs. See Declaration of Maximiliano D. Couvillier III, Esq. ("Couvillier Declaration") at ¶¶3, 4, attached hereto as **Exhibit A**. As stated in the attached Declaration of their counsel, MMAWC and DFP anticipate incurring an additional \$2,250.00 in fees in connection with this Joint Motion and related proceedings. *Id.* at ¶5. Thus, MMAWC and DFP seek a total of \$6,750.00 in reasonable attorneys' fees and \$3.50 in reasonable costs. *Id.* at ¶¶8, 10.

**B. Reasonable Fees and Costs Incurred By MMAX**

MMAX has incurred \$9,780.00 in reasonable attorneys' fees and \$10.50 in reasonable costs relating to the motion confirming the arbitration awards. See Declaration of Michael N. Feder, Esq. ("Feder Declaration") at ¶¶ 4-5, attached hereto as **Exhibit B**; see also Exhibit B-1. As noted in the Feder Declaration, MMAX anticipates incurring an additional \$3,500 in attorneys' fees in connection with this Joint Motion and related proceedings. See Exhibit B at ¶¶ 6. Thus, MMAX requests a total of \$13,290.50 in reasonable attorneys' fees and costs. See Exhibit B at ¶¶ 4-6.



1    **II.    ARGUMENT**

2            The Nevada Uniform Arbitration Act expressly provides an award of reasonable  
3 attorneys' fees and costs to prevailing parties in contested proceedings to confirm arbitration  
4 awards. NRS 38.243(3) provides:

5            On application of a prevailing party to a contested judicial  
6 proceeding under NRS 38.239, 38.241 or 38.242, the court may  
7 add reasonable attorney's fees and other reasonable expenses of  
litigation incurred in a judicial proceeding after the award is made  
to a judgment confirming, vacating without directing a rehearing,  
modifying or correcting an award.

8    *Id.*

9            As discussed above, Zion and Wright not only contested the NRS 38.239 Joint Motion to  
10 confirm the Arbitration Awards, but further sought to vacate or modify those awards per NRS  
11 38.241 and NRS 38.242. Having prevailed, MMAWC, DFP and MMAX are therefore entitled  
12 to their reasonable attorneys' fees and costs per NRS 38.243(3).

13            When considering the reasonableness of attorneys' fees to award, courts consider the  
14 following factors (1) the qualities of the advocate: ability, training, education, experience,  
15 professional standing and skill; (2) the character of the work to be done: its difficulty, its  
16 intricacy, its importance, time and skill required, the responsibility imposed and the prominence  
17 and character of the parties where they affect the importance of the litigation; (3) the work  
18 actually performed by the lawyer: the skill, time and attention given to the work; (4) the result:  
19 whether the attorney was successful and what benefits were derived. *Brunzell v. Golden Gate*  
20 *Nat. Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969).

21            When considering these factors, MMAWC and DFP are entitled to \$6,975.00 in  
22 reasonable attorneys' fees and \$3.50 in reasonable costs (*see* Exhibit A at ¶¶8, 10); and MMAX  
23 is entitled to \$13,280.00 in reasonable attorneys' fees and \$10.50 in reasonable costs (*see* Exhibit  
24 B at ¶¶ 4-6, *see also* Exhibit B-1);.

25            (1).    *Qualities of the advocates*

26                    **MMAWC & DFP**

27            As demonstrated by the Couvillier Declaration attached here as Exhibit A, the matter  
28

1 required the skills and experience of an experienced lawyer, who was able to efficiently and  
2 successfully confirm the Arbitration Awards. The qualities of counsel for MMAWC and DFP  
3 are further established by the Couvillier Declaration, which counsel has several leadership roles  
4 within the legal profession and are considered preeminent attorneys by their peers. The hourly  
5 rate charged by counsel for MMAWC and DFP are either well within, or below, the general  
6 prevailing rates in this locality for attorneys of comparable reputation and experience. *See*  
7 *Couvillier Declaration at ¶6.*

8 **MMAX**

9 The qualities of the attorneys at Dickinson Wright are well-known in the community. As  
10 detailed in the Feder Declaration, the attorneys and paralegals working on this matter have vast  
11 litigation experience spanning multiple decades, are well respected in the legal community, have  
12 received numerous accolades and recognition in the legal industry, and, have impressive training  
13 and educational backgrounds. *See* Ex. B at ¶¶ 4-5. The hourly rates charged by counsel for  
14 MMAX are either within, or below, the general prevailing rates in this locality for attorneys of  
15 comparable reputation and experience. *Id.* at ¶ 7.

16 (2). *Character of work done*

17 The proceedings to confirm the Arbitration Award required full briefing and preparation  
18 and attendance for hearing. The briefs required a detailed summary of the arbitration  
19 proceedings and analysis and discussion of the Arbitration Awards. Notably, the proceedings  
20 should have been streamlined, and unopposed, because Zion and Wright failed to timely seek to  
21 vacate or modify the Arbitration Awards under NRS 38.241 or NRS 38.242.

22 Zion and Wright received notice of the Arbitration Awards on June 25, 2021, and  
23 October 4, 2021, respectively. Zion and Wright, however, did not file a motion to vacate those  
24 awards per NRS 38.241, which, by the most generous timeline, required them to have made such  
25 a motion by no later than January 2, 2022. *See* NRS 38.241(2) (motions to vacate an arbitration  
26 award must be made within 90 days). Similarly, Zion and Wright did not file a motion to modify  
27 or correct those arbitration awards per NRS 38.242, which, again by the most generous timeline,  
28 required Zion to have made such motion by no later than January 2, 2022. *See* NRS 38.242(1)

1 (motions to modify or correct an arbitration award must be made within 90 days).

2 Thus, Zion and Wright lost their right to seek to vacate or modify the Arbitration Awards.  
3 *Richardson v. Harris*, 107 Nev. 763, 765, 818 P.2d 1209, 1210 (1991)("[W]e conclude that  
4 Harris' motion to correct or modify the award was not timely filed under NRS 38.155. Therefore,  
5 the district court erred in refusing to confirm the arbitration award upon Richardson's motion.")  
6 (NRS 38.155 was superseded; NRS 38.241 and 38.242 provide identical language regarding 90  
7 day deadline); *Casey v. Wells Fargo Bank, N.A.*, 128 Nev. 713, 716–18, 290 P.3d 265, 267–68  
8 (2012) (if a party does not timely file motions to vacate or modify an arbitration award, the  
9 confirmation of such award is mandatory). Nevertheless, Zion and Wright expanded the  
10 proceedings by not only opposing the Joint Motion, but also by [untimely] seeking to vacate or  
11 modify the Arbitration Awards. *See 4/28/22 Opposition* (Doc ID# 102). Thus, Zion and Wright  
12 greatly expanded the issues, the briefing and the scope of the proceedings.

13 Notably, MMAWC, DFP and MMAX filed their briefs jointly for judicial economy. And  
14 thus, the attorneys' fees and costs sought here are particularly reasonable.

15 **(3). *Work Actually Performed - The Attorney Hours Covered By This Request***

16 The attached attorney Declarations and Invoices establish the services provided for each  
17 hour billed. In undersigned counsels' experience, the hours expended are reasonable and in-line  
18 with the scope of the work and tasks that were required in this matter, particularly as Zion and  
19 Wright expanded the proceedings, as discussed above.

20 **(4). *Results obtained by counsel***

21 MMAWC, DFP and MMAX prevailed in upholding and confirming the Arbitration  
22 Awards; and in defeating Zion and Wright's substantive (and untimely) contest of those awards.

23 //

24 //

25 //

26 //

27 //

28 //

1 **III. CONCLUSION**

2 Taken together, an evaluation of the foregoing factors support an award to MMAWC and  
3 DFP in the total sum of \$6,753.50 for their reasonable and necessary fees and costs incurred; and  
4 an award to MMAX in the total sum of \$13,290.50 for its reasonable and necessary fees and  
5 costs incurred.

6 Respectfully,

7  
8 **KENNEDY & COUVILLIER, PLLC**

9 /s/Maximiliano D. Couvillier III

10 Maximiliano D. Couvillier III, Esq. (NBN 7661)

11 mcouvillier@kclawnv.com

12 *Attorneys for Defendant MMAWC, LLC and The  
13 Nancy And Bruce Deifik Family Partnership  
14 LLP*

8 **DICKINSON WRIGHT PLLC**

9 /s/Michael N. Feder

10 Michael N. Feder (NBN. 7332)

11 MFeder@dickinsonwright.com

12 Gabriel A. Blumberg (NBN 12332)

13 GBlumberg@dickinsonwright.com

14 *Attorneys for MMAX Investment Partners,  
15 Inc. dba Professional Fighters League*

CERTIFICATE OF SERVICE

The undersigned, an employee of Dickinson Wright PLLC, hereby certifies that on the 1<sup>st</sup> day of July, 2022, I caused a copy of the foregoing **JOINT MOTION FOR ATTORNEYS' FEES PER NRS 38.243** to be transmitted by electronic service in accordance with Administrative Order 14.2, to all interested parties, through the Court's Odyssey *E-File & Serve* system addressed to:

Byron E. Thomas, Esq.  
3275 South Jones Boulevard, Suite 104  
Las Vegas, NV 89146  
Email: [byronthomaslaw@gmail.com](mailto:byronthomaslaw@gmail.com)  
*Attorney for Plaintiff*

Maximiliano D. Couvillier III  
KENNEDY & COUVILLIER, PLLC  
3271 East Warm Springs Road  
Las Vegas, NV 89120  
Email: [mcouvillier@kclawnv.com](mailto:mcouvillier@kclawnv.com)

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

/s/: Dianne M. Kelling  
An Employee of DICKINSON WRIGHT PLLC

EXHIBIT INDEX

Exhibit No.	Description	No. of Pages (Exclusive of Exhibit Sheet)
A	Declaration of Maximiliano D. Couvillier III, Esq. In Support of Joint Motion for Attorneys' Fees Pursuant to NRS 38.243	3
A-1	Kennedy & Couvillier, PLLC Activities Report ("KC Law Invoice")	3
A-2	Electronic Invoice from the Eight Judicial District Court for the \$3.50 Filing Fee	2
B	Declaration of Michael N. Feder In Support of Joint Motion for Attorneys' Fees Pursuant to NRS 38.243	3
B-1	Redacted billing records reflecting attorneys' fees and costs incurred by Dickinson Wright on behalf of MMAX	10

# **EXHIBIT A**

Maximiliano D. Couvillier III, Esq.  
Nevada Bar No. 7661

**KENNEDY & COUVILLIER, PLLC**

3271 E. Warm Springs Rd.

Las Vegas, NV 89120

Tel: (702) 605-3440

Fax: (702) 625-6367

[mcouvillier@kclawnv.com](mailto:mcouvillier@kclawnv.com)

*Attorneys for MMAWC, LLC and the Nancy  
and Bruce Deifik Family Partnership, LLLP*

**AMERICAN ARBITRATION ASSOCIATION**

Zion Wood OB Wan Trust and Shawn Wright as  
Trustee,

Plaintiffs,

vs.

MMAWC, LLC dba World Series of Fighting;  
Nancy and Bruce Deifik Family Partnership, LLP,  
MMAX Investment Partners, Inc. dba  
Professional Fighters League; Carlos Silva, an  
individual,

Defendants.

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

**DECLARATION OF MAXIMILIANO D.  
COUVILLIER III, ESQ. IN SUPPORT  
OF JOINT MOTION FOR  
ATTORNEYS' FEES PER NRS 38.243**

Pursuant to NRS 53.045, Maximiliano D. Couvillier III, Esq. declare as follows:

1. I the attorney of record for defendants MMAWC, LLC ("MMAWC"), The Nancy And Bruce Deifik Family Partnership LLLP ("DFP") in the above-captioned action ("Action"). I am over 18 years of age and make this Declaration on my personal knowledge, unless facts are otherwise stated on information and belief, to which I believe such facts to be true.

2. I am familiar with all of the attorneys' fees and costs incurred by MMAWC and the DFP in connection with their proceedings in this Action to confirm the arbitration awards in their favor issued by the AAA on June 25, 2021 and October 4, 2021 ("Arbitration Awards").

3. As of the date of this Declaration, MMAWC and DFP has reasonably and necessarily incurred \$4,500.00 in attorneys' fees, and \$3.50 in costs. The reasonable attorneys' fees represent 12.00 hours of legal services that I provided at my hourly rate of \$375.00.



1           4.     Attached to this Application as Exhibit A-1 is a true and correct copy of Kennedy  
2     & Couvillier, PLLC Activities Report ("KC Law Invoice") for our file, which details all of the  
3     legal services, including description and time, rendered by attorneys for MMAWC and DFP in  
4     connection with the proceedings to confirm the Arbitration Awards. I am personally familiar  
5     with the contents of the KC Law Invoice, as they reflect services rendered and description and  
6     time entries that I personally prepared and documented. Attached as Exhibit A-2 is the  
7     electronic invoice from the Eighth Judicial District Court Clerk for the \$3.50 filing fee in  
8     connection with the proceedings to confirm the Arbitration Awards.

9           5.     Based on personal experience, I reasonably anticipate that MMAWC and DFP  
10    will reasonably incur an additional \$2,250.00 for 6 attorney hours in connection with review of  
11    the opposition, preparation of the Joint Reply and attendance and participation at the anticipated  
12    hearing on this matter.

13          6.     I graduated from California Western School of Law in 2001 and have been  
14    practicing complex, commercial litigation in Nevada for 20 years. I am an author of the Nevada  
15    Practice Manual. I am the Chair of the Nevada State Bar Litigation Section. I am the Chairman  
16    of the Board of Legal Aid Center of Southern Nevada. I was recently appointed by Nevada  
17    Senators Masto or Rosen to the U.S. District Court Judicial Selection Committee. I have a AV-  
18    Preeminent Peer Review Rating by Martindale-Hubbell, and been rated by Best Lawyers® for  
19    Commercial Litigation, Super Lawyers Mountain States ® for Business Litigation and been  
20    recognized by Nevada Business Magazine as one of the "Top Lawyers" in Southern Nevada.

21          7.     My hourly fee to MMAWC and DFP is \$375. As the Managing Partner for  
22    Kennedy & Couvillier, PLLC and the Chair of the Nevada State Bar Litigation Section, I am  
23    generally familiar with the fees other attorneys practicing in commercial litigation charge in  
24    Clark County, Nevada. Through my career, I have been responsible for overseeing the billing of  
25    many clients on many substantial and ordinary pieces of commercial litigation. I have attempted  
26    to keep abreast of the fees charged by comparable firms and attorneys. Based on my experience,  
27  
28

1 I believe that my \$375 hourly fee is reasonable and in-line with, or below that of, other  
2 commercial litigators in Clark County with similar experience.

3 8. The \$6,750.00 in attorneys' fees reasonably and necessarily incurred by  
4 MMAWC and the Partnership in connection with the proceedings to confirm the Arbitration  
5 Awards.

6 9. The 18.00 attorney hours expended were reasonable and necessary for the  
7 successful confirmation of the Arbitration Awards in favor of MMAWC and DFP.

8 10. The \$3.50 in costs incurred by MMAWC and DFP in connection with the  
9 proceedings to confirm the Arbitration Awards are also reasonable and necessary.

10 11. The Court should award MMAWC and DFP the total reasonable attorneys' fees  
11 and costs in the amount of \$6,753.50 pursuant to NRS 38.243(3).

12 12. I declare under penalty of perjury that the foregoing is true and correct.

13 Dated: July 1, 2022.

14 /s/Maximiliano D. Couvillier III  
15 Maximiliano D. Couvillier III, Esq.  
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# **Exhibit A-1**

# Activities Export

06/27/2022  
12:11 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
06/27/2022		PREPARE JOINT MOTION FOR FEES REGARDING CONFIRMING ARBITRATION AWARD. REVIEW INVOICES AND PREPARE SUPPORTING DECLARATION.	13-00001 MMAWC	Maximiliano Couvillier	2.00h	375.00	-	750.00
06/08/2022		PREPARE FOR AND ATTEND HEARING ON MOTION TO CONFIRM ARBITRATION AWARD AND REDUCE TO JUDGMENT. ADVISE CLIENT OF OUTCOME. PREPARE ORDER GRANTING MOTION.	13-00001 MMAWC	Maximiliano Couvillier	1.70h	375.00	-	637.50
05/11/2022		PREPARE FOR AND ATTEND HEARING ON MOTION TO CONFIRM ARBITRATION AWARD.	13-00001 MMAWC	Maximiliano Couvillier	1.00h	375.00	-	375.00
05/05/2022		REVIEW AND EDITS TO REPLY IN SUPPORT OF MOTION TO CONFIRM ARBITRATION AWARD.	13-00001 MMAWC	Maximiliano Couvillier	1.00h	375.00	-	375.00
04/29/2022		REVIEW OPPOSITION TO MOTION TO CONFIRM ARBITRATION AWARD.	13-00001 MMAWC	Maximiliano Couvillier	1.30h	375.00	-	487.50



# Activities Export

06/27/2022  
12:11 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
04/04/2022	\$	FILING FEE MOTION TO CONFIRM ARBITRATION AWARD.	13-00001 MMAWC	Maximiliano Couvillier	1.00	3.50	-	3.50
04/04/2022		FINALIZE AND FILE MOTION TO CONFIRM ARBITRATION AWARD.	13-00001 MMAWC	Maximiliano Couvillier	1.10h	375.00	-	412.50

Activities Export

06/27/2022  
12:11 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
03/23/2022		WORK ON MOTION TO CONFIRM ARBITRATION AWARD.	13-00001 MMAWC	Maximiliano Couvillier	1.80h	375.00	-	675.00
03/22/2022		CONTINUE WORKING ON MOTION TO CONFIRM ARBITRATION AWARD.	13-00001 MMAWC	Maximiliano Couvillier	1.10h	375.00	-	412.50

# **Exhibit A-2**

**From:** [no-reply@efilingmail.tylertech.cloud](mailto:no-reply@efilingmail.tylertech.cloud)  
**To:** [Max Couvillier](#)  
**Subject:** Filing Submitted for Case: A-17-764118-C; Zion Wood Obi Wan Trust, Plaintiff(s)vs. MMAWC LLC, Defendant(s); Envelope Number: 9637624  
**Date:** Monday, April 4, 2022 2:26:41 PM

---

## Filing Submitted

Envelope Number: 9637624  
Case Number: A-17-764118-C  
Case Style: Zion Wood Obi Wan Trust,  
Plaintiff(s)vs. MMAWC LLC, Defendant(s)

Filing Details	
<b>Court</b>	Eighth Judicial District Court
<b>Date/Time Submitted</b>	4/4/2022 2:25 PM PST
<b>Filing Type</b>	Motion - MOT (CIV)
<b>Filing Description</b>	JOINT MOTION TO REOPEN THIS MATTER AND TO CONFIRM ARBITRATION AWARDS IN FAVOR OF DEFENDANTS AND FOR JUDGMENT THEREON
<b>Type of Filing</b>	EFileAndServe
<b>Filed By</b>	Maximiliano Couvillier III
<b>Filing Attorney</b>	Maximiliano Couvillier III

Fee Details
Your account is never charged until your filing is accepted. If you see any pending charges on your account prior to acceptance, this is an authorization hold to ensure the funds are available so your filing can be accepted without delay.
If the filing is canceled or rejected these funds will be released and will return to your account according to your financial institution's policies (typically 3-10 business days).
<b>Total:\$3.50</b> (The envelope still has pending filings and the fees are subject to change)
For additional details regarding your fees click the link below <a href="https://nevada.tylerhost.net/OfsWeb/FileAndServeModule/Envelope/ViewPrintableEnvelope?Id=9637624">https://nevada.tylerhost.net/OfsWeb/FileAndServeModule/Envelope/ViewPrintableEnvelope?Id=9637624</a>

Document Details	
<b>Document Title</b>	Joint Motion to Confirm Arbitration 040422.pdf
<b>Lead Document Page Count</b>	66
<b>Lead Document</b>	<a href="#">Download Document</a>
This link is active for 180 days.	

For technical assistance, contact your service provider





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Email: [efiling.support@tylertech.com](mailto:efiling.support@tylertech.com)

Please do not reply to this email. It was automatically generated.

# **EXHIBIT B**

**DECL**

DICKINSON WRIGHT PLLC

Michael N. Feder

Nevada Bar No. 7332

Email: [mfeder@dickinson-wright.com](mailto:mfeder@dickinson-wright.com)

Gabriel A. Blumberg

Nevada Bar No. 12332

Email: [gblumberg@dickinson-wright.com](mailto:gblumberg@dickinson-wright.com)

3883 Howard Hughes Parkway, Suite 800

Las Vegas, Nevada 89169

Tel: (702) 550-4400

Fax: (844) 670-6009

*Attorneys for Defendant*

*MMAV Investment Partners, Inc.*

*dba Professional Fighters League*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

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

Plaintiff,

vs.

MMAVC, LLC d/b/a WORLD SERIES OF FIGHTING a Nevada limited liability company; MMAV 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

DEPT. XXVII

**DECLARATION OF MICHAEL N. FEDER IN SUPPORT OF JOINT MOTION FOR ATTORNEYS' FEES PER NRS 38.243**

I, Michael N. Feder, Esq., hereby declare and state as follows:

1. I am an attorney licensed to practice in the State of Nevada and I am a Member with the law firm of Dickinson Wright, PLLC, counsel for MMAV Investment Partners Inc. dba Professional Fighters League ("MMAV").<sup>1</sup> I have personal knowledge of the matters set forth

<sup>1</sup> MMAV is now known as Professional Fighters League. LLC.

1 herein and know them to be true except for matters set forth herein on information and belief,  
2 and as to those matters, I believe them to be true.

3 2. I am submitting this declaration in support of MMAX and MMAWC's Joint  
4 Motion for Attorneys' Fees Per NRS 38.243 (the "Joint Fee Motion").

5 3. A true and correct copy of redacted billing records reflecting attorneys' fees and  
6 costs incurred by Dickinson Wright on behalf of MMAX in relation to confirming the arbitration  
7 awards is attached hereto as Exhibit B-1. The time entries identified in the June billing statement  
8 run through June 27, 2022 and do not include the time incurred relating to the Joint Fee Motion.  
9 The records have been redacted to exclude unrelated attorneys' fees and costs and to preserve  
10 attorney-client privilege. An unredacted version can be produced to the Court for in camera  
11 review upon request

12 4. I am a member with Dickinson Wright. I graduated cum laude from Temple  
13 University Beasley School of Law in 1992 and have been admitted to practice in Nevada since  
14 2000. During my career, I have handled numerous commercial and business litigation matters on  
15 behalf of, among others, national and regional businesses, firms, and institutions. I also have  
16 earned an AV preeminent peer-review rating from Martindale-Hubbell, been recognized by  
17 Chambers USA since 2017, been honored in the Mountain States Super Lawyers since 2011,  
18 been recognized by Best Lawyers since 2012, and been recognized as Legal Elite by Nevada  
19 Business Magazine since 2009. My standard billing rate is \$710 per hour, but I charged a  
20 discounted rate of \$580 per hour for the tasks identified in Exhibit B-1. I billed 14.1 hours  
21 relating to the previously filed joint motion seeking confirmation of the arbitration awards for a  
22 total cost of \$8,178.00, but MMAX is only seeking to recover 12.8 hours for my time for a total  
23 cost of \$7,424.00. The entries for which MMAX is not seeking reimbursement are highlighted  
24 in Exhibit B-1.

25 5. Brooks Westergard is an associate with Dickinson Wright. He graduated from  
26 Williamette University College of Law in 2016 and then clerked for the Honorable Justice James  
27 W. Hardesty of the Supreme Court of Nevada and the Honorable Judge Howard D. McKibben of  
28 the United States District Court, District of Nevada. Following his clerkships, Mr. Westergard

1 has practiced in the area of complex business litigation. His billing rate on this matter was \$380  
2 per hour and he billed 8.6 hours for a total cost of \$3,268, but MMAX is only seeking to recover  
3 6.2 hours of his time for a total cost of \$2,356.00. The entries for which MMAX is not seeking  
4 reimbursement are highlighted in Exhibit B-1.

5 6. In addition, I anticipate that MMAX will incur an additional \$3,500.00 to  
6 \$4,000.00 in attorneys' fees and costs in connection with the preparation of the Joint Fee Motion  
7 and reply in support of the Joint Fee Motion, and the preparation and attendance at the  
8 anticipated hearing on this matter.

9 7. I am familiar with the rates charged by attorneys in Nevada with comparable skill  
10 and experience. The hourly rates for the attorneys and staff who worked on this case are at or  
11 below the prevailing market rates in Las Vegas, Nevada. I believe the hours spent by MMAX's  
12 counsel on this matter are fair and reasonable.

13 8. As the responsible attorney for this matter, I regularly reviewed and edited the  
14 invoices sent to MMAX in this matter. I believe the fees and costs charged to MMAX were  
15 reasonable.

16 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
17 knowledge, information and belief.

18 Dated this 1st day of July, 2022.

19  
20 /s/ Michael N. Feder  
MICHAEL N. FEDER  
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# **EXHIBIT B-1**

IN ACCOUNT WITH

DICKINSON WRIGHT PLLC

3883 HOWARD HUGHES PARKWAY, SUITE 800  
LAS VEGAS, NV 89169  
TELEPHONE: (702) 550-4400  
http://www.dickinsonwright.com  
FEDERAL I.D. # [REDACTED]

INVOICE DATE: MARCH 11, 2022  
INVOICE NO.: 1672205

MMAX INVESTMENT PARTNERS INC.  
[REDACTED]

ATTN: Jim Bramson

CLIENT/MATTER NO.: 088397-00004

RE: AAA DEMAND: ZION WOOD V. MMAWC ET AL.

PRIVILEGED AND CONFIDENTIAL

FOR PROFESSIONAL SERVICES THROUGH FEBRUARY 28, 2022

		<u>USD</u>
TOTAL FEES CURRENT INVOICE .....	\$	116.00
TOTAL CURRENT INVOICE .....	\$	116.00

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

Remittance Instructions		
***Terms: Due and Payable Upon Receipt***		
Mail To:	ACH Instructions:	Wire Instructions:
Dickinson Wright PLLC 2600 W. Big Beaver Suite 300 Troy, MI 48084	JP Morgan Chase Bank N.A. 28660 Northwestern Highway Southfield, MI 48034 ABA Number: [REDACTED] Account# [REDACTED] (Please Reference Invoice Numbers)	JP Morgan Chase Bank N.A. 28660 Northwestern Highway Southfield, MI 48034 ABA Number: [REDACTED] Swift Code: [REDACTED] (International) Account# [REDACTED] (Please Reference Invoice Numbers)

AA671

IN ACCOUNT WITH

**DICKINSON WRIGHT** PLLC

3883 HOWARD HUGHES PARKWAY, SUITE 800  
LAS VEGAS, NV 89169  
TELEPHONE: (702) 550-4400  
<http://www.dickinsonwright.com>  
FEDERAL I.D. # [REDACTED]

AAA DEMAND: ZION WOOD V. MMAWC ET AL.  
CLIENT/MATTER NO.:088397-00004

INVOICE DATE: MARCH 11, 2022  
INVOICE NO.: 1672205  
PAGE 2

**CURRENT INVOICE DETAIL**

<u>DATE</u>	<u>INITIALS</u>	<u>SERVICES</u>	<u>HOURS</u>	<u>VALUE</u>
02/01/22	MNF	Review file re motion to confirm arbitration award	0.2	116.00
TOTAL FEES			0.2	\$ 116.00
TOTAL CURRENT INVOICE				\$ 116.00

**TIMEKEEPER SUMMARY**

<u>TIMEKEEPER</u>	<u>TITLE</u>	<u>RATE</u>	<u>HOURS</u>	<u>VALUE</u>
MICHAEL N. FEDER	MEMBER	580.00	0.20	116.00
TOTAL FEES CURRENT INVOICE			0.20	\$ 116.00

AA672



IN ACCOUNT WITH

**DICKINSON WRIGHT** PLLC

3883 HOWARD HUGHES PARKWAY, SUITE 800  
LAS VEGAS, NV 89169  
TELEPHONE: (702) 550-4400  
<http://www.dickinsonwright.com>  
FEDERAL I.D. # [REDACTED]

INVOICE DATE: APRIL 12, 2022  
INVOICE NO.: 1681742

MMA INVESTMENT PARTNERS INC.  
[REDACTED]

ATTN: Jim Bramson

CLIENT/MATTER NO.: 088397-00004

RE: AAA DEMAND: ZION WOOD V. MMAWC ET AL.

PRIVILEGED AND CONFIDENTIAL

FOR PROFESSIONAL SERVICES THROUGH MARCH 31, 2022

		<u>USD</u>
TOTAL FEES CURRENT INVOICE .....	\$	638.00
TOTAL CURRENT INVOICE .....	\$	638.00



Remittance Instructions		
***Terms: Due and Payable Upon Receipt***		
Mail To:	ACH Instructions:	Wire Instructions:
Dickinson Wright PLLC 2600 W. Big Beaver Suite 300 Troy, MI 48084	JP Morgan Chase Bank N.A. 28660 Northwestern Highway Southfield, MI 48034 ABA Number: [REDACTED] Account# [REDACTED] (Please Reference Invoice Numbers)	JP Morgan Chase Bank N.A. 28660 Northwestern Highway Southfield, MI 48034 ABA Number: [REDACTED] Swift Code: [REDACTED] (International) Account# [REDACTED] (Please Reference Invoice Numbers)

AA673

IN ACCOUNT WITH

**DICKINSON WRIGHT** PLLC

3883 HOWARD HUGHES PARKWAY, SUITE 800  
LAS VEGAS, NV 89169  
TELEPHONE: (702) 550-4400  
<http://www.dickinsonwright.com>  
FEDERAL I.D. # [REDACTED]

AAA DEMAND: ZION WOOD V. MMAWC ET AL.  
CLIENT/MATTER NO.:088397-00004

INVOICE DATE: APRIL 12, 2022  
INVOICE NO.: 1681742  
PAGE 2

**CURRENT INVOICE DETAIL**

<u>DATE</u>	<u>INITIALS</u>	<u>SERVICES</u>	<u>HOURS</u>	<u>VALUE</u>
03/23/22	MNF	Emails with M. Couvillier re motion to confirm arbitration award	0.2	116.00
03/24/22	MNF	Emails with M. Couvillier re motion to confirm arbitration award	0.2	116.00
03/29/22	MNF	Review and revise draft motion to confirm arbitration decision; Email M. Couvillier re same; Email J. Bramson re [REDACTED]	0.7	406.00
TOTAL FEES			1.1	\$ 638.00
TOTAL CURRENT INVOICE				\$ 638.00

**TIMEKEEPER SUMMARY**

<u>TIMEKEEPER</u>	<u>TITLE</u>	<u>RATE</u>	<u>HOURS</u>	<u>VALUE</u>
MICHAEL N. FEDER	MEMBER	580.00	1.10	638.00
TOTAL FEES CURRENT INVOICE			1.10	\$ 638.00

AA674

IN ACCOUNT WITH

**DICKINSON WRIGHT** PLLC

3883 HOWARD HUGHES PARKWAY, SUITE 800  
LAS VEGAS, NV 89169  
TELEPHONE: (702) 550-4400  
http://www.dickinsonwright.com  
FEDERAL I.D. # [REDACTED]

INVOICE DATE: MAY 10, 2022  
INVOICE NO.: 1690815

MMA INVESTMENT PARTNERS INC.  
[REDACTED]

ATTN: Jim Bramson

CLIENT/MATTER NO.: 088397-00004

RE: AAA DEMAND: ZION WOOD V. MMAWC ET AL.

PRIVILEGED AND CONFIDENTIAL

FOR PROFESSIONAL SERVICES THROUGH APRIL 30, 2022

USD

TOTAL FEES CURRENT INVOICE .....	\$	2,504.00
TOTAL CURRENT INVOICE .....	\$	2,504.00

[REDACTED]				
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]				[REDACTED]
[REDACTED]				[REDACTED]

Remittance Instructions		
***Terms: Due and Payable Upon Receipt***		
Mail To:	ACH Instructions:	Wire Instructions:
Dickinson Wright PLLC 2600 W. Big Beaver Suite 300 Troy, MI 48084	JP Morgan Chase Bank N.A. 28660 Northwestern Highway Southfield, MI 48034 ABA Number: [REDACTED] Account# [REDACTED] (Please Reference Invoice Numbers)	JP Morgan Chase Bank N.A. 28660 Northwestern Highway Southfield, MI 48034 ABA Number: [REDACTED] Swift Code: [REDACTED] (International) Account# [REDACTED] (Please Reference Invoice Numbers)

AA675

IN ACCOUNT WITH



3883 HOWARD HUGHES PARKWAY, SUITE 800  
LAS VEGAS, NV 89169  
TELEPHONE: (702) 550-4400  
<http://www.dickinsonwright.com>  
FEDERAL I.D. # [REDACTED]

AAA DEMAND: ZION WOOD V. MMAWC ET AL.  
CLIENT/MATTER NO.:088397-00004

INVOICE DATE: MAY 10, 2022  
INVOICE NO.: 1690815  
PAGE 2

**CURRENT INVOICE DETAIL**

<u>DATE</u>	<u>INITIALS</u>	<u>SERVICES</u>	<u>HOURS</u>	<u>VALUE</u>
04/04/22	MNF	Review final draft of motion to confirm arbitration award and emails with M. Couvillier re same	0.3	174.00
04/05/22	MNF	Emails with J. Bramson re [REDACTED]	0.1	58.00
04/15/22	MNF	Emails with B. Thomas and M. Couvillier re B. Thomas's request for additional time to respond oppose motion to confirm arbitration award; emails with M. Couvillier re same	0.2	116.00
04/25/22	MNF	Emails with B. Thomas and M. Couvillier re B. Thomas's request for extension of time to oppose motion to confirm arbitration award; Emails with M. Couvillier re same	0.3	174.00
04/26/22	MNF	Review, revise and comment on drafts of stipulation extending briefing deadlines on motion to confirm arbitration award; Emails with B. Thomas and M. Couvillier re same	0.6	348.00
04/27/22	MNF	Emails with counsel re stipulation extending briefing schedule on arbitration motion; Review order approving same	0.2	116.00
04/28/22	MNF	Initial review of opposition to motion to confirm arbitration award	0.3	174.00
04/29/22	MNF	Further review of opposition to arbitration motion; Telephone conference and emails with M. Couvillier re same; Emails and telephone conference with B. Westergard re [REDACTED]; work on arguments for reply brief	1.4	812.00
04/29/22	BTW	Review file and relevant pleadings; conduct preliminary legal research related to reply in support of motion to confirm arbitration award; discussed [REDACTED] with M. Feder	1.4	532.00
TOTAL FEES			4.8	\$ 2,504.00
TOTAL CURRENT INVOICE				\$ 2,504.00

**TIMEKEEPER SUMMARY**

<u>TIMEKEEPER</u>	<u>TITLE</u>	<u>RATE</u>	<u>HOURS</u>	<u>VALUE</u>
MICHAEL N. FEDER	MEMBER	580.00	3.40	1,972.00
BROOKS T. WESTERGARD	ASSOCIATE	380.00	1.40	532.00
TOTAL FEES CURRENT INVOICE			4.80	\$ 2,504.00

AA676

IN ACCOUNT WITH

DICKINSON WRIGHT PLLC

3883 HOWARD HUGHES PARKWAY, SUITE 800  
LAS VEGAS, NV 89169  
TELEPHONE: (702) 550-4400  
http://www.dickinsonwright.com  
FEDERAL I.D. # [REDACTED]

INVOICE DATE: JUNE 8, 2022  
INVOICE NO.: 1700735

MMAX INVESTMENT PARTNERS INC.  
[REDACTED]

ATTN: Jim Bramson

CLIENT/MATTER NO.: 088397-00004

RE: AAA DEMAND: ZION WOOD V. MMAWC ET AL.

PRIVILEGED AND CONFIDENTIAL

FOR PROFESSIONAL SERVICES THROUGH MAY 31, 2022

		<u>USD</u>
TOTAL FEES CURRENT INVOICE .....	\$	5,984.00
TOTAL DISBURSEMENTS CURRENT INVOICE .....	\$	10.50
TOTAL CURRENT INVOICE .....	\$	5,994.50

[REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

Remittance Instructions		
***Terms: Due and Payable Upon Receipt***		
Mail To:	ACH Instructions:	Wire Instructions:
Dickinson Wright PLLC 2600 W. Big Beaver Suite 300 Troy, MI 48084	JP Morgan Chase Bank N.A. 28660 Northwestern Highway Southfield, MI 48034 ABA Number: [REDACTED] Account# [REDACTED] (Please Reference Invoice Numbers)	JP Morgan Chase Bank N.A. 28660 Northwestern Highway Southfield, MI 48034 ABA Number: [REDACTED] Swift Code: [REDACTED] (International) Account# [REDACTED] (Please Reference Invoice Numbers)

AA677

IN ACCOUNT WITH

**DICKINSON WRIGHT** PLLC

 3883 HOWARD HUGHES PARKWAY, SUITE 800  
 LAS VEGAS, NV 89169  
 TELEPHONE: (702) 550-4400  
 http://www.dickinsonwright.com  
 FEDERAL I.D. # [REDACTED]

 AAA DEMAND: ZION WOOD V. MMAWC ET AL.  
 CLIENT/MATTER NO.: 088397-00004

 INVOICE DATE: JUNE 8, 2022  
 INVOICE NO.: 1700735  
 PAGE 2

## CURRENT INVOICE DETAIL

<u>DATE</u>	<u>INITIALS</u>	<u>SERVICES</u>	<u>HOURS</u>	<u>VALUE</u>
05/02/22	BTW	Conduct legal research re applicability of Nevada Rules of Civil Procedure to arbitration proceedings; draft corresponding section of Reply in Support of Motion to Confirm	2.8	1,064.00
05/02/22	BTW	Conduct legal research re standard to vacate arbitration award and timeliness of filing motion to vacate or modify arbitration award; draft corresponding section of Reply in Support of Motion to Confirm	2.4	912.00
05/03/22	BTW	Complete initial draft of Reply in Support of Motion to Confirm Arbitration Award	1.5	570.00
05/03/22	MNF	Review, revise and comment on draft reply in support of motion to confirm arbitration awards and emails with B. Westergard re same	1.2	696.00
05/04/22	BTW	Revised Reply in Support of Motion to Confirm; transmitted same to co-defendant's counsel	0.5	190.00
05/04/22	MNF	Review, revise and comment on updated draft of reply in support of motion confirm arbitration awards and emails with B. Westergard re [REDACTED]	1.1	638.00
05/05/22	MNF	Review M. Couvillier's comments to draft reply brief to confirm arbitration awards; Review and revise reply brief; emails with M. Couvillier and B. Westergard re same; Draft motion to file exhibit to reply brief under seal; emails with J. Bramson re [REDACTED]	1.3	754.00
05/06/22	MNF	Emails with M. Couvillier re reply brief; Review and finalize reply brief and motion to file exhibit under seal for filing	0.8	464.00
05/11/22	MNF	Prepare for and attend hearing on motion to confirm arbitration awards (during hearing, senior judge assigned to handle hearing continued the hearing to date trial judge available to hear motion); Emails with counsel and court re hearing; Review minute order re continued hearing	1.2	696.00

TOTAL FEES	12.8	\$	5,984.00
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<u>DATE</u>	<u>DISBURSEMENTS</u>	<u>QTY</u>	<u>RATE</u>	<u>VALUE</u>
05/23/22	JP Morgan Chase Commercial Card - FILING FEES - MICHAEL FEDER	1	3.50	3.50
05/26/22	JP Morgan Chase Commercial Card - FILING FEES - MICHAEL FEDER	1	3.50	3.50
05/26/22	JP Morgan Chase Commercial Card - FILING FEES - MICHAEL FEDER	1	3.50	3.50

AA678

IN ACCOUNT WITH

**DICKINSON WRIGHT** PLLC

3883 HOWARD HUGHES PARKWAY, SUITE 800  
LAS VEGAS, NV 89169  
TELEPHONE: (702) 550-4400  
<http://www.dickinsonwright.com>  
FEDERAL I.D. #3 [REDACTED]

AAA DEMAND: ZION WOOD V. MMAWC ET AL.  
CLIENT/MATTER NO.:088397-00004

INVOICE DATE: JUNE 8, 2022  
INVOICE NO.: 1700735  
PAGE 3

TOTAL DISBURSEMENTS	\$	10.50
TOTAL CURRENT INVOICE	\$	<u>5,994.50</u>

TIMEKEEPER SUMMARY				
<u>TIMEKEEPER</u>	<u>TITLE</u>	<u>RATE</u>	<u>HOURS</u>	<u>VALUE</u>
MICHAEL N. FEDER	MEMBER	580.00	5.60	3,248.00
BROOKS T. WESTERGARD	ASSOCIATE	380.00	7.20	2,736.00
TOTAL FEES CURRENT INVOICE			<u>12.80</u>	<u>\$ 5,984.00</u>

AA679

6/28/2022 4:36 PM

## TIME WIP LISTING

Client: 088397 MMAX Investment Partners Inc.

Currency Code: USD

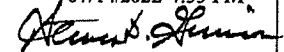
Work Date	Timekeeper	WIP	WIP Amount	Matter Number	Matter Name	Narrative	Proforma
or	Name	Hours					
6/3/2022 2817	Feder, Michael N.	0.10	59.00	088397-00004	AAA Demand: Zion Wood v. MMAWC et al.	Telephone conference with J. Bramson re [REDACTED]	
6/7/2022 2817	Feder, Michael N.	1.10	638.00	088397-00004	AAA Demand: Zion Wood v. MMAWC et al.	Prepare for continued hearing on motion to confirm arbitration awards; Review minute order granting motion to file under seal	
6/8/2022 2817	Feder, Michael N.	1.60	928.00	088397-00004	AAA Demand: Zion Wood v. MMAWC et al.	Final preparation for and attend hearing on motion to confirm arbitration awards; emails with J. Bramson re granting of motion and next steps; emails with M. Couvillier and draft order granting motion to confirm arbitration awards; Review and revise draft order	
6/9/2022 2817	Feder, Michael N.	0.40	232.00	088397-00004	AAA Demand: Zion Wood v. MMAWC et al.	Review, revise and finalize order on motion to seal; Emails with counsel re same and order granting motion confirm arbitration awards	
6/10/2022 2817	Feder, Michael N.	0.30	174.00	088397-00004	AAA Demand: Zion Wood v. MMAWC et al.	Emails with court and counsel re order granting arbitration motion	
6/13/2022 2817	Feder, Michael N.	0.10	58.00	088397-00004	AAA Demand: Zion Wood v. MMAWC et al.	Review entered order granting motion to confirm arbitration awards	
6/14/2022 2817	Feder, Michael N.	0.20	116.00	088397-00004	AAA Demand: Zion Wood v. MMAWC et al.	Prepare notice of entry of order confirming arbitration awards; Emails with J. Bramson re [REDACTED]	
TOTAL:		3.80	2,204.00	USD			
Total:			3.80				

AA680

6/28/2022 4:36 PM

1 of 1



  
CLERK OF THE COURT

1 **SAO**  
2 BYRON E. THOMAS, ESQ. (NBN 8906)  
3 E-mail: [byronthomaslaw@gmail.com](mailto:byronthomaslaw@gmail.com)  
4 LAW OFFICES OF BYRON THOMAS  
5 3275 S. Jones Blvd, Ste 104  
6 Las Vegas, Nevada 89146  
7 Telephone: 702 747-3103  
8 *Attorneys for Plaintiff*

9  
10 **EIGHTH JUDICIAL DISTRICT COURT**  
11 **CLARK COUNTY, NEVADA**

12 Zion Wood Obi Wan Trust,

13 Plaintiff(s) ,

14 v.

15 MMAWC, LLC d/b/a WORLD SERIES OF  
16 FIGHTING a Nevada limited liability company;  
17 et al.,

18 Defendants.

CASE NO: A-17-764118-C  
DEPT NO: XXVII

**STIPULATION AND ORDER TO  
EXTEND THE DEADLINES TO FILE  
OPPOSITION AND REPLY TO  
DEFENDANTS' JOINT MOTION FOR  
ATTORNEY FEES PURSUANT TO NRS  
38.243**

**(FIRST REQUEST)**

**Date of Hearing: August, 3, 2022**  
**Time of Hearing: 9 a.m.**

19 Zion Wood Obi Wan Trust, and Defendants MMAWC LLC d/b/a World Series of Fighting  
20 ("MMAWC"), The Nancy And Bruce Deifik Family Partnership LLLP ("DFP") and MMAX  
21 Investments Partners, Inc. dba Professional Fighters League ("MMAX"),<sup>1</sup> by and through their  
22 respective counsels of record have agreed to enter into a Stipulation based on the following terms  
23 and conditions:

24 On July 1, 2022, Defendants filed a "Joint Motion for Attorneys' Fees Pursuant to NRS  
25 38.243" (the "Motion"). The parties have agreed to extend the deadline for Plaintiff's  
26 opposition/response to the Motion from July, 15, 2022 to July 19, 2022 and to extend the deadline  
27 for Defendants' to file their reply from July 27, 2022 to July 29, 2022. This is the parties' First  
28 Request. The extensions are necessary to accommodate the schedules and workload of counsel.

///

///

<sup>1</sup> MMAX is now known as Professional Fighters League, LLC.

Dated this 14th day of July 2022

**KENNEDY & COUVILLIER, PLLC**

/s Maximiliano D. Couvillier

MAXIMILIANO D. COUVILLIER

Nevada Bar No. 7661

mcouvillier@kclawnv.com

3271 E. Warm Springs Rd.

Las Vegas, Nevada 89120

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

**LAW OFFICES OF BYRON THOMAS**

/s Byron E. Thomas

BYRON E. THOMAS

Nevada Bar No. 8906

byronthomaslaw@gmail.com

3275 S. Jones Blvd., Ste. 104

Las Vegas, Nevada 89146

*Attorneys for 170615 Alberta Ltd.*

**DICKINSON WRIGHT PLLC**

/s Michael N. Feder

MICHAEL N. FEDER

Nevada Bar No. 7332

mfeder@dickinson-wright.com

GABRIEL A. BLUMBERG

Nevada Bar No. 12332

gblumberg@dickinson-wright.com

3883 Howard Hughes Parkway, Suite 800

Las Vegas, NV 89169

*Attorneys for MMAX Investment Partners, Inc. dba Professional Fighters League*

**ORDER**

**GOOD CAUSE APPEARING, IT IS SO ORDERED that:**

- 1.** Plaintiff's opposition/response to the "Joint Motion for Attorneys' Fees Pursuant to NRS 38.243" (the "Motion") is due on or before July 19, 2022; and
- 2.** Defendants' reply to the Motion is due July 29, 2022.

DATED this 14th day of July, 2022, 2022

Nancy L Allf

DISTRICT COURT JUDGE

F0B 79A EC0C 427F

Nancy Allf

District Court Judge



Byron Thomas <byronthomaslaw@gmail.com>

---

**RE: EXTERNAL: RE: Stipulation with Revisions for approval**

1 message

---

Michael N. Feder <MFeder@dickinson-wright.com>

Thu, Jul 14, 2022 at 3:36 PM

To: Max Couvillier <mcouvillier@kclawnv.com>, Byron Thomas <byronthomaslaw@gmail.com>

Cc: "Dianne M. Kelling" <DKelling@dickinson-wright.com>, "Gabriel A. Blumberg" <GBlumberg@dickinson-wright.com>

You may affix my e-signature as well.

**Michael N. Feder Member**

3883 Howard Hughes Parkway Phone 702-550-4440  
Suite 800 Fax 844-670-6009  
Las Vegas NV 89169 Email MFeder@dickinsonwright.com  
[Profile](#) [V-Card](#)

---

**DICKINSON WRIGHT**

ARIZONA CALIFORNIA FLORIDA KENTUCKY MINNESOTA NEVADA OHIO  
PENNSYLVANIA TEXAS VIRGINIA WASHINGTON DC WISCONSIN

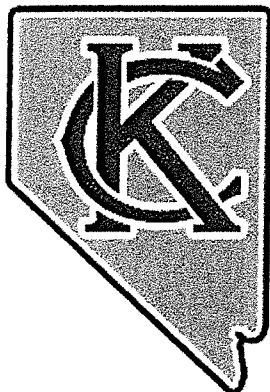
**From:** Max Couvillier <mcouvillier@kclawnv.com>

**Sent:** Thursday, July 14, 2022 3:34 PM

**To:** Byron Thomas <byronthomaslaw@gmail.com>; Michael N. Feder <MFeder@dickinson-wright.com>

**Subject:** EXTERNAL: RE: Stipulation with Revisions for approval

I am fine with your edits Byron. You may submit the stipulation with my e-signature.



Maximiliano D. Couvillier III, Esq.  
**KENNEDY & COUVILLIER**  
3271 E. Warm Springs Rd.  
Las Vegas, NV 89120  
Office: (702) 605-3440  
Direct: (702) 608-4975  
[mcouvillier@kclawnv.com](mailto:mcouvillier@kclawnv.com)

7/14/22, 3:48 PM

Gmail - RE: EXTERNAL: RE: Stipulation with Revisions for approval

[www.kclawnv.com](http://www.kclawnv.com)

"In a lawsuit the first to speak seems right, until counsel comes forward to cross-examine."

Proverbs 18:17

**From:** Byron Thomas <[byronthomaslaw@gmail.com](mailto:byronthomaslaw@gmail.com)>  
**Sent:** Thursday, July 14, 2022 3:24 PM  
**To:** Max Couvillier <[mcouvillier@kclawnv.com](mailto:mcouvillier@kclawnv.com)>; Michael N. Feder <[MFeder@dickinson-wright.com](mailto:MFeder@dickinson-wright.com)>  
**Subject:** Stipulation with Revisions for approval

Attached is the stipulation with revisions for your approval,

The information contained in this e-mail, including any attachments, is confidential, intended only for the named recipient(s), and may be legally privileged. If you are not the intended recipient, please delete the e-mail and any attachments, destroy any printouts that you may have made and notify us immediately by return e-mail.

Neither this transmission nor any attachment shall be deemed for any purpose to be a "signature" or "signed" under any electronic transmission acts, unless otherwise specifically stated herein. Thank you.

1 CSERV

2 DISTRICT COURT  
3 CLARK COUNTY, NEVADA  
4

5  
6 Zion Wood Obi Wan Trust,  
7 Plaintiff(s)

CASE NO: A-17-764118-C

8 vs.

DEPT. NO. Department 27

9 MMAWC LLC, Defendant(s)

10  
11 **AUTOMATED CERTIFICATE OF SERVICE**

12 This automated certificate of service was generated by the Eighth Judicial District  
13 Court. The foregoing Stipulation and Order was served via the court's electronic eFile system  
14 to all recipients registered for e-Service on the above entitled case as listed below:

15 Service Date: 7/14/2022

16 Michael Feder

mfeder@dickinsonwright.com

17 Gabriel Blumberg

gblumberg@dickinsonwright.com

18 Docket Clerk - LV Litigation

LV\_LitDocket@dickinsonwright.com

19 byron Thomas

Byronthomaslaw@gmail.com

20 Byron Thomas

Byronthomaslaw@gmail.com

21 Maximiliano Couvillier

mcouvillier@kclawnv.com

22 Paul Haire

paul.m.haire@gmail.com

23 Traci Burns

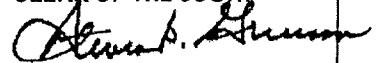
tburns@dickinsonwright.com

24 Todd Kennedy

tkennedy@kclawnv.com

25 Dianne Kelling

DKelling@dickinsonwright.com



1 LAW OFFICES OF BYRON THOMAS

2 BYRON E. THOMAS, ESQ.

3 Nevada Bar No. 8906

3 3275 S. Jones Blvd. Ste. 104

4 Las Vegas, Nevada 89146

4 Phone: 702 747-3103

5 Facsimile: (702) 543-4855

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

6 Attorney for Zion Wood Obi Want Trust and its Trustee

7 **EIGHTH JUDICIAL DISTRICT COURT**

8 **CLARK COUNTY NEVADA**

9  
10 ZION WOOD OBI WAN TRUST and  
11 SHAWN WRIGHT as trustee of ZION  
12 WOOD OBI WAN TRUST; WSO  
GLOBAL, LLC, a Wyoming limited liability  
company

13 Plaintiff

14 vs.

15  
16 MMA WC, LLC d/b/a WORLD SERIES OF  
FIGHTING a Nevada limited liability  
17 company; MMAX INVESTMENT  
PARTNERS, INC. dba PROFESSIONAL  
18 FIGHTERS LEAGUE, a Delaware  
c0lporation; BRUCE DEIFIK, an individual;  
19 CARLOS SILVA, an individual; NANCY  
20 AND BRUCE DEIFIK FAMILY  
PARTNERSHIP LLLP, a Colorado limited  
21 liability partnership; KEITH REDMOND, an  
individual; DOES I through X, inclusive; and  
22 ROE Colporations XX through XXX,  
23 inclusive

24 Defendants

Case No.: A A-17-764118-C

**NOTICE OF APPEAL**

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**EXHIBIT "A"**





NEOJ  
DICKINSON WRIGHT PLLC  
Michael N. Feder  
Nevada Bar No. 7332  
Email: [mfeder@dickinson-wright.com](mailto:mfeder@dickinson-wright.com)  
Gabriel A. Blumberg  
Nevada Bar No. 12332  
Email: [gblumberg@dickinson-wright.com](mailto:gblumberg@dickinson-wright.com)  
3883 Howard Hughes Parkway, Suite 800  
Las Vegas, Nevada 89169  
Tel: (702) 550-4400  
Fax: (844) 670-6009

*Attorneys for Defendant*  
*MMAX Investment Partners, Inc.*  
*dba Professional Fighters League*

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,

vs.

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

DEPT. XXVII

NOTICE OF ENTRY OF ORDER  
GRANTING MMAWC AND MMAX'S  
JOINT MOTION TO CONFIRM  
ARBITRATION AWARDS

...

...

...

...

...

1 PLEASE TAKE NOTICE that on the 13<sup>th</sup> day of June, 2022, an Order Granting  
2 MMAWC and MMAX'S Joint Motion to Confirm Arbitration Awards was entered by the Court.  
3 A copy of said Order is attached hereto as Exhibit 1.

4 Dated: this 14<sup>th</sup> day of June, 2022.

5 DICKINSON WRIGHT PLLC

6  
7 /s/ Michael N. Feder  
8 MICHAEL N. FEDER  
9 Nevada Bar No. 7332  
mfeder@dickinson-wright.com  
10 GABRIEL A. BLUMBERG  
Nevada Bar No. 12332  
gblumberg@dickinson-wright.com  
11 3883 Howard Hughes Parkway, Suite 800  
Las Vegas, Nevada 89169

12 *Attorneys for MMAX Investment Partners,*  
13 *Inc. dba Professional Fighters League*  
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CERTIFICATE OF SERVICE

The undersigned, an employee of Dickinson Wright PLLC, hereby certifies that on the 14<sup>th</sup> day of June 2022, she caused a copy of the foregoing **NOTICE OF ENTRY OF ORDER GRANTING MMAWC AND MMAX'S JOINT MOTION TO CONFIRM ARBITRATION AWARDS** to be transmitted by electronic service in accordance with Administrative Order 14.2, to all interested parties, through the Court's Odyssey E-File & Serve system addressed to:

Byron E. Thomas, Esq.  
3275 South Jones Boulevard, Suite 104  
Las Vegas, NV 89146  
Email: [byronthomaslaw@gmail.com](mailto:byronthomaslaw@gmail.com)

*Attorney for Plaintiff*

Maximiliano D. Couvillier III  
KENNEDY & COUVILLIER, PLLC  
3271 East Warm Springs Road  
Las Vegas, NV 89120  
Email: [mcouvillier@kclawnv.com](mailto:mcouvillier@kclawnv.com)

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

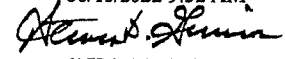
/s/: Dianne M. Kelling  
An Employee of DICKINSON WRIGHT PLLC

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EXHIBIT INDEX

Exhibit No.	Description	No. of Pages (Exclusive of Exhibit Sheet)
1	Order Granting MMAWC and MMAX'S Joint Motion to Confirm Arbitration Awards	7

# EXHIBIT 1

  
CLERK OF THE COURT

**ORDR**

**KENNEDY & COUVILLIER, PLLC**

Maximiliano D. Couvillier III, Esq. (Bar No. 7661)

3271 E. Warm Springs Rd.

Las Vegas, Nevada 89120

Ph. (702) 605-3440/Fax (702) 625-6367

[mcouvillier@kclawnv.com](mailto:mcouvillier@kclawnv.com)

*Attorneys for Defendants MMAWC, LLC and the Deifik Family Partnership LLLP*

**DICKINSON WRIGHT PLLC**

Michael N. Feder, Esq. (Bar No. 7332)

Gabriel A. Blumberg, Esq. (Bar No. 12332)

3883 Howard Hughes Parkway, Suite 800

Las Vegas, Nevada 89169-0965

Ph: (702) 550-4400/Fax: (844) 670-6009

[MFeder@dickinsonwright.com](mailto:MFeder@dickinsonwright.com)

[Blumberg@dickinsonwright.com](mailto:Blumberg@dickinsonwright.com)

*Attorneys for MMAX Investment Partners, Inc., now known as Professional Fighters League, LLC*

**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

**ORDER GRANTING MMAWC AND  
MMAX'S JOINT MOTION TO  
CONFIRM ARBITRATION AWARDS**

On June 8, 2022, the Court heard the Joint Motion to Reopen this Matter and to Confirm  
Arbitration Awards in Favor of Defendants and for Judgment Thereon ("Motion") filed by

1 defendants MMAWC, LLC ("MMAWC"), The Nancy And Bruce Deifik Family Partnership  
2 LLLP ("DFP") and MMAX Investment Partners, Inc. now known as Professional Fighters  
3 League, LLC ("PFL"). Maximiliano D. Couvillier III, Esq. appeared on behalf of defendants  
4 MMAWC and DFP. Michael N. Feder, Esq. appeared on behalf of MMAX. Byron Thomas,  
5 Esq. appeared on behalf of the plaintiffs Zion Obi Wan Trust ("Zion") and its trustee Shawn  
6 Wright ("Wright")(together Zion and Wright, "Plaintiffs").

7 The Court has considered the Motion, all related briefs and exhibits, the Court's record,  
8 and the argument of counsel. For good cause appearing,

9 **IT IS HEREBY ORDERED** that the Motion is **GRANTED** in all respects. The Court  
10 concludes that: (a) no manifest error or injustice exist with respect to the June 25, 2021 Summary  
11 Judgment Award ("06/25/21 Award") and October 4, 2021 Fees and Costs Award ("10/4/21  
12 Award") entered in the subject America Arbitration Association arbitration ("Arbitration"); (b)  
13 the 06/25/21 Award and 10/24/21 Award are not arbitrary or capricious; and (c) the Arbitrator  
14 did not manifestly disregard the law with respect to the 06/25/21 Award or the 10/24/21 Award.

15 **IT IS FUTHER ORDERED** that the 06/25/21 Award and 10/24/21 Award are hereby  
16 confirmed, and judgment shall be entered thereon in favor of MMAWC and DFP in the amount  
17 of \$43,687.20 and in favor of PFL in the amount \$49,320.90.

18 **IT IS SO ORDERED.**

Dated this 13th day of June, 2022

19 Nancy L Alf  
20 District Court Judge TW  
21 Dated: \_\_\_\_\_  
22 828 4A7 8DFD 50C4  
Nancy Alf  
District Court Judge

23 **Respectfully Submitted By,**

24 /s/Maximiliano D. Couvillier III  
KENNEDY & COUVILLIER, PLLC  
Maximiliano D. Couvillier III, Esq., (Bar No. 7661)  
25 *Attorneys for Defendants MMAWC, LLC and Deifik Family Partnership LLLP*

26 /s/Michael N. Feder  
27 DICKINSON WRIGHT, PLLC  
Michael N. Feder, Esq. (Bar No. 7332)  
28 *Attorneys for Defendant MMAX Investment Partners, Inc., now known as  
Professional Fighters League, LLC*

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Approved As To Form And Content,

/s/Byron Thomas

Byron Thomas, Esq. (Bar 8906)

*Attorney for Plaintiffs*



**From:** Michael N. Feder  
**To:** Max Couvillier  
**Cc:** Byron Thomas; Gabriel A. Blumberg; Dianne M. Kelling  
**Subject:** Re: EXTERNAL: Zion  
**Date:** Wednesday, June 8, 2022 2:35:54 PM

---

You have approval to affix my e-signature.

Thank you  
Michael

Sent from my iPhone please excuse any typos

On Jun 8, 2022, at 2:32 PM, Max Couvillier <[mcouvillier@kclawnv.com](mailto:mcouvillier@kclawnv.com)> wrote:

Attached is the proposed order regarding the joint motion to reopen action and to confirm arbitration award.  
Please let me know if I have your consent to affix your electronic signature and submit

Due to my schedule, I intend to submit by 10am Friday June 10.

Thanks

Maximiliano D. Couvillier III, Esq.  
KENNEDY & COUVILLIER, PLLC  
3271 E Warm Springs Rd.  
Las Vegas, NV 89120  
702 605-3440  
[mcouvillier@kclawnv.com](mailto:mcouvillier@kclawnv.com)  
[www.kclawnv.com](http://www.kclawnv.com)

<Order Confirm ARB Awards June 2022[1].doc>

#### **Michael N. Feder Member**

3883 Howard Hughes Parkway Phone 702-550-4440  
Suite 800 Fax 844-670-6009  
Las Vegas NV 89169 Email [MFeder@dickinsonwright.com](mailto:MFeder@dickinsonwright.com)

[Profile](#) [V-Card](#)

---

**DICKINSON WRIGHT** PLLC

ALABAMA CALIFORNIA FLORIDA GEORGIA ILLINOIS INDIANA KANSAS MISSISSIPPI  
MISSOURI NEVADA NEW YORK NORTH CAROLINA TEXAS VIRGINIA WASHINGTON

---

**From:** White, Terrance  
**To:** "Byron Thomas"  
**Cc:** Max Couvillier; Michael Feder; Gabriel A. Blumberg  
**Subject:** RE: Eighth Judicial District Court - Proposed Order Returned  
**Date:** Friday, June 10, 2022 12:01:26 PM

---

Understandable; Mr. Couvillier, please resend the order with Mr. Thomas's signature.



**Terrance White JD, MBA, LLM**  
Law Clerk  
to the Honorable Nancy L. Alf  
Eighth Judicial District Court | Department 27  
Regional Justice Center Courtroom 16A  
Phone: (702) 671-0884  
Email: [Dept27LC@clarkcountycourts.us](mailto:Dept27LC@clarkcountycourts.us)

**From:** Byron Thomas [mailto:byronthomaslaw@gmail.com]  
**Sent:** Friday, June 10, 2022 11:47 AM  
**To:** White, Terrance  
**Cc:** Max Couvillier; Michael Feder; Gabriel A. Blumberg  
**Subject:** Re: Eighth Judicial District Court - Proposed Order Returned

[NOTICE: This message originated outside of Eighth Judicial District Court -- DO NOT CLICK on links or open attachments unless you are sure the content is safe.]

Mr. Couvillier provided the proposed order at 2:30pm on Wednesday and imposed an arbitrary deadline of 10 am Friday, which did not even give a full two days to respond. I wanted to double check the numbers in the order, but I was swamped yesterday and I intended to get back to this today. At no point did I refuse to sign.

I approve it as to form in that the proposed order correctly states the Court's oral decision.

On Fri, Jun 10, 2022 at 11:00 AM White, Terrance <[Dept27LC@clarkcountycourts.us](mailto:Dept27LC@clarkcountycourts.us)> wrote:

Mr. Thomas,

If you not approve of the order, please either send me a competing order or file an objection.



**Terrance White JD, MBA, LLM**  
Law Clerk  
to the Honorable Nancy L. Alf  
Eighth Judicial District Court | Department 27  
Regional Justice Center Courtroom 16A  
Phone: (702) 671-0884  
Email: [Dept27LC@clarkcountycourts.us](mailto:Dept27LC@clarkcountycourts.us)

**From:** Max Couvillier [mailto:mcouvillier@kclawny.com]  
**Sent:** Friday, June 10, 2022 10:54 AM  
**To:** White, Terrance; Michael Feder; Gabriel A. Blumberg; Byron Thomas  
**Subject:** Fwd: Eighth Judicial District Court - Proposed Order Returned

[NOTICE: This message originated outside of Eighth Judicial District Court -- DO NOT CLICK on links or open attachments unless you are sure the content is safe.]

Zion's counsel refused to sign the order granting joint motion to confirm arbitration awards. Did not contact us with any objections. Did not contact us at all. We don't know what else to do to comply with the generic message below.

We know that Zion's counsel received the proposed order granting joint motion to confirm arbitration awards because he responded to the proposed order regarding the related joint motion to seal.

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Please forgive typos, sent via I-phone

Begin forwarded message:

From: [NoReply@clarkcountycourts.us](mailto:NoReply@clarkcountycourts.us)  
Date: June 10, 2022 at 10:26:17 AM PDT  
To: Max Couvillier <[mcouvillier@kclawnv.com](mailto:mcouvillier@kclawnv.com)>  
Subject: Eighth Judicial District Court - Proposed Order Returned

Zion Wood v. MMAWC et al, Case No. A-17-764118-C

Your proposed order or document requiring a judge's signature to the court has been returned for the following reason(s): All Parties must sign and approve the Order. If Parties object to the Order, they can file an Objection on the record or redlining the Proposed Order. Please email the law clerk at [Dept27LC@clarkcountycourts.us](mailto:Dept27LC@clarkcountycourts.us) to inform them this is a CO. Also, include a word version of the Order, hearing transcript, and the objection/redlining of the Order for the Court's consideration.

1 CSERV

2 DISTRICT COURT  
3 CLARK COUNTY, NEVADA

4  
5  
6 Zion Wood Obi Wan Trust,  
Plaintiff(s)

CASE NO: A-17-764118-C

DEPT. NO. Department 27

7 vs.

8 MMAWC LLC, Defendant(s)  
9

10 **AUTOMATED CERTIFICATE OF SERVICE**

11  
12 This automated certificate of service was generated by the Eighth Judicial District  
13 Court. The foregoing Order Granting Motion was served via the court's electronic eFile  
system to all recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 6/13/2022

15 Michael Feder

mfeder@dickinsonwright.com

16 Gabriel Blumberg

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17 Docket Clerk - LV Litigation

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18 byron Thomas

Byronthomaslaw@gmail.com

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22 Paul Haire

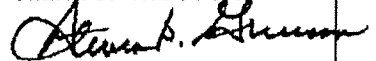
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Attorney for Zion Wood Obi Want Trust and its Trustee

**EIGHTH JUDICIAL DISTRICT COURT**  
**CLARK COUNTY NEVADA**

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

Plaintiff

vs.

MMA WC, 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

**OPPOSITION TO JOINT MOTION**

**FOR ATTORNEY FEES**

///

///

///

1 COMES now Plaintiff ZION WOOD OBI WAN TRUST and SHAWN WRIGHT as  
2 trustee of ZION WOOD OBI WAN TRUST by and through counsel of record Law Offices of  
3 Byron Thomas as files the Opposition to the Defendants Joint Motion for Attorney Fees (the  
4 "Opposition"). The Opposition is based on the pleadings and papers of counsel and any argument  
5 ordered by the Court.

6  
7 **POINTS AND AUTHORITIES**

8 **A. The Court Should Exercise its Discretionary Authority and Deny the Joint  
9 Motion for Fees Pursuant to NRS 38.243(3)**

10 NRS 38.243(3) authorizes a discretionary award of fees. NRS 38.243, provides as follows

11 On application of a prevailing party to a contested judicial proceeding under NRS  
12 38.239, 38.241 or 38.242, the court may add reasonable attorney's fees and other  
13 reasonable expenses of litigation incurred in a judicial proceeding after the award  
14 is made to a judgment confirming, vacating without directing a rehearing,  
15 modifying or correcting an award.

16 (emphasis added). The statute does not provide guidance as to when a court should exercise its  
17 discretion to award attorney's fees and costs. Similarly, Plaintiffs have been unable to find Nevada  
18 Supreme Court authority setting a standard for awarding attorney fees pursuant to NRS 38.243(3).

19 However, the comments section to Section 25 of the Uniform Arbitration Act (2000), does  
20 provides some guidance as to the applicable standard for awarding attorney fees pursuant to the  
21 arbitration act:

22 3. Section 25(c) promotes the statutory policy of finality of arbitration awards by  
23 adding a provision for recovery of reasonable attorney's fees and reasonable  
24 expenses of litigation to prevailing parties in contested judicial actions to confirm,  
25 vacate, modify or correct an award. Potential liability for the opposing parties' post  
26 award litigation expenditures will tend to discourage all but the most meritorious  
27 challenges of arbitration awards. If a party prevails in a contested judicial  
28 proceeding over an arbitration award, Section 25(c) allows the court discretion to  
award attorney's fees and litigation expenses. Blitz v. Bath Isaac Adas Isrea  
Congregation, 352 Md. 31, 720 A.2d 912 (1998)(permitting award of attorney's  
fees in both the trial and appeal of an action to confirm and enforce an arbitration  
award against party who refused to comply with it)

.....

5. A court has discretion to award fees under Section 25(c). Courts acting under  
similar language in fee-shifting statutes have not been reluctant to exercise their  
discretion to take equitable considerations into account.

1 Other states that have adopted the uniform act, have some decisions on point. For instance,  
2 the Utah case, Duke v. Graham, 158 P.3d 540, 547-48 (2007). As in Nevada, the Utah arbitration  
3 statute leaves an award of fees and costs to the court's discretion. *Id.*, at 548. Similarly to Nevada,  
4 the Utah statute gives no guidance on how the court should exercise its discretion. In Duke, the  
5 Utah Supreme Court looked to policies behind the statute and reasoned that:

6 [t]he inclusion of an attorney fees provision within the Arbitration Act suggests that  
7 our policies favor the enforceability of arbitration awards and discourage re-  
8 litigation of valid awards. . . . Against this policy of finality, we must balance the  
9 need not to unduly burden parties with the threat of fees when they have legitimate  
10 concerns about the legal validity of an award.

11 *Id.*, (internal quotations omitted).

12 In order to balance these equities, the Utah Supreme Court "found it necessary to assess the  
13 merits of the party's arguments in order to balance the competing policy concerns." The above  
14 persuasive authority thus emphasizes not only the District Court's discretion, which the Nevada  
15 Supreme Court has recognized in countless cases, but also the emphasis that an award of fees  
16 should be used as a tool to discourage meritless or frivolous litigation after the conclusion of an  
17 arbitration proceeding. Geo-Logic Associates, Inc. v. Metal Recovery Sols., Inc., 2020 WL  
18 59816, at \*4 (D. Nev. Jan. 6, 2020);

19 But while § 38.234 seeks to promote a policy of finality of arbitration awards, this  
20 must be balanced with the "need to avoid unduly burden[ing] parties with the threat  
21 of fees when they have legitimate concerns about the legal validity of an  
22 award." Summa Emergency Assocs., Inc. v. Emergency Physicians Ins. Co., No.  
23 72913, 2018 WL 2041544, at \*2 n.3 (Nev. App. Apr. 20, 2018) (quoting Duke v.  
24 Graham, 158 P.3d 540, 548 (Utah 2007)).

25 In the instant case the challenge was not meritless or frivolous. As Plaintiffs have stated, the  
26 Nevada Supreme Court that there is also a common law challenge to an arbitration award. Clark  
27 Cty. Educ. Ass'n v. Clark Cty. Sch. Dist., 122 Nev. 337, 341, 131 P.3d 5, 8 (2006). The Common  
28 law challenge allows the court to review the award for arbitrary and capriciousness. *Id.* at Thus,  
the Nevada Supreme Court, through judge made law, has created two additional grounds to allow

1 the court to review an arbitration award. The time limit that Defendants vociferously argue  
2 precludes Plaintiffs' common law challenge is found in the statute.

3 Defendants cite no case law that extends the statutory time limit to the Court's ability to review  
4 the award pursuant to the common-law. The Defendants' caselaw does not discuss the common  
5 law basis for the court to review an arbitration award at all. Joint Motion for Attorney Fees p. 6:1-  
6 12.

7  
8 Nonetheless, even if the court were to treat the Supreme Court's silence regarding the  
9 application of the ninety (90) day window to a district court's common law review of an arbitrator's  
10 award as tacit approval that the 90 day window is applicable, Plaintiffs are arguing for a good faith  
11 modification of the law. Since, the Nevada Supreme Court has deviated from the statute, and  
12 enlarged the grounds for challenging an arbitrator's award, it is certainly reasonable to argue that  
13 the time period in the statute should not apply to a district court's common law review of an  
14 arbitration award. Thus, Plaintiff's arguments are not meritless or frivolous:

15 since a frivolous action has been defined as one that is "baseless," and "baseless"  
16 means that "the pleading is [not] well grounded in fact [or is not] warranted by  
existing law or a good faith argument for the extension, modification or reversal of  
existing law."<sup>38</sup>

17 Simonian v. Univ. & Cmty. Coll. Sys. of Nevada, 122 Nev. 187, 196, 128 P.3d 1057, 1063

18 (2006). In addition, it is without question that the arbitrator's, finding that Defendants could not  
19 have requested attorney fees at the district court level was clearly erroneous, and it is also clear  
20 that there can be a violation of the duty of good faith and fair dealing even if there is technical  
21 compliance with an agreement. See Opposition to Joint Motion to Confirm Arbitration Award  
22 Dk # 102, p. 2-6; see also Joint Motion to Confirm Award, Arbitrator Decision Exhibit 5 p. 4.  
23 Therefore, the challenge to the confirmation award was brought in good faith and supported by  
24 facts.  
25

26 ///

27 ///

28 ///



1  
2 B. Joint Defendants Should not Receive any Fees for Filing the Reply.

3 The Defendants' counsel spent a little over seventeen (17) hours on drafting the reply.  
4 Exhibit A-1 to Joint Motion for Attorney Fees 4/9/22-6/8/22 and Exhibit B-1 4/29/22-5/11/22.  
5 That seems quite excessive given the experience and acumen of Defendants' counsel. See Exhibits  
6 A and B to Joint Motion for Attorney Fees.

7 Moreover, to grant Defendants' request attorney fees related to the drafting of the Reply  
8 to the Opposition to Confirm Award would also contravene the award of the arbitrator. It is  
9 uncontested that Plaintiffs made these same arguments during the arbitration. Yet, Defendants did  
10 not address the arguments in the arbitration, nor when they filed their motion to confirm the  
11 arbitration award. They should not be allowed to collect attorney fees for arguments raised for the  
12 first time in the Reply and arguments that they did not make during the arbitration. See  
13 Carstarphen v. Milsner, 594 F. Supp. 2d 1201, 1204 (D. Nev. 2009); see also Teamsters,  
14 Chauffeurs, Salesdrivers & Helpers, Local Union No. 330 v. Elgin Eby-Brown Co., 670 F. Supp.  
15 1393, 1397 (N.D. 111. 1987); see also United Food & Commercial Workers, Local 400 v. Marval  
16 Poultry Co., 645 F. Supp. 1174, 1180 (W.D.Va. 1986).

17 In addition, granting the Defendants fees for preparing the Reply to the Opposition to Confirm  
18 Arbitration would have the perverse effect of actually contravening the parties' arbitration  
19 agreement and the arbitrator's award. The arbitrator ruled that Defendants' were not entitled to  
20 any fees incurred during the arbitration. Joint Motion for Attorney Fees Exhibit 5 p. 5. Thus, if  
21 Defendants had raised the issues in the reply during the arbitration, as they were required to do,  
22 then they would have been denied those fees. They certainly could not have then argued in a  
23 motion for fees before this Court that seventeen (17) hours was a reasonable amount of time to  
24 spend on the Reply to the Opposition to Confirm Arbitration when they would simply be rehashing  
25 arguments made in the arbitration.

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**CONCLUSION**

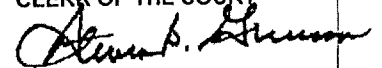
For the foregoing the Plaintiffs requests that the Court deny the Defendants' Joint request for attorney fees.

Dated this 19<sup>th</sup> day of July 2022

LAW OFFICES OF BYRON THOMAS

/s/ Byron E. Thomas

\_\_\_\_\_  
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21 *Attorneys for MMAX Investment Partners, Inc. dba*

22 *Professional Fighters League*

23 **DISTRICT COURT**

24 **CLARK COUNTY, NEVADA**

25 ZION WOOD OBI WAN TRUST and SHAWN  
26 WRIGHT as trustee of ZION WOOD OBI WAN  
27 TRUST; WSOF GLOBAL, LLC, a Wyoming  
28 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

**JOINT REPLY IN SUPPORT OF  
MOTION FOR ATTORNEYS' FEES PER  
NRS 38.243**

Date: August 3, 2022

Time: 9:00 am

1 The Court should grant the Joint Motion for Fees by defendants MMAWC, LLC  
2 (“MMAWC”), The Nancy And Bruce Deifik Family Partnership LLLP (“DFP”) and MMAX  
3 Investment Partners, Inc. dba Professional Fighters League (“MMAX” and together with  
4 MMAWC and DFP, the “Defendants”).<sup>1</sup>

5 The July 19, 2022 opposition to Defendants’ Joint Motion for Fees (“7/19/22 Fees  
6 Opposition”) by plaintiffs Zion Obi Wan Trust (“Zion”) and its trustee Shawn Wright (“Wright”  
7 (together Zion and Wright, “Plaintiffs”) is not clear and their arguments, as with past briefs, are  
8 underdeveloped or ambiguous. Plaintiffs appear to argue that: (a) fees per NRS 38.243 are  
9 somehow only appropriate when an opposition to confirm an arbitration award is “frivolous;” (b)  
10 their April 28, 2022, opposition/request to vacate the Arbitration Awards (Plaintiffs’ “4/28/22  
11 Brief”) was not “frivolous” because it was based on common law standards, which Plaintiffs  
12 allege were not considered or somehow ignored as untimely; and (c) Defendants should be  
13 precluded from recovering attorneys’ fees for addressing Plaintiffs’ arguments pertaining to the  
14 common law standards in their reply brief.

15 Plaintiffs’ arguments are unreasonable, and the Court should grant the motion because:

16 (a) the standard for fees under NRS 38.243 is not whether a parties’ opposition to  
17 confirm arbitration is “frivolous.” Rather, the standard is simply whether a party seeking fees  
18 prevailed in confirming the arbitration award, which Defendants indisputably meet;

19 (b) the Court confirmed the Arbitration Awards under both statutory and common  
20 law standards; and

21 (c) Plaintiffs do not actually dispute the vast majority of the attorneys’ fees  
22 requested by Defendants and only present a conclusory argument concerning the attorneys’ fees  
23 requested relating to Defendants’ reply brief in support of their 4/4/22 *Joint Motion to Confirm*  
24 *Arbitration Awards* (the “Joint Motion to Confirm”).

25 //

26 //

27

28 <sup>1</sup> MMAX is now known as Professional Fighters League, LLC.

**MEMORANDUM OF POINTS & AUTHORITIES**

**I. DEFENDANTS ARE ENTITLED TO THEIR FEES UNDER NRS 38.243 AS THE PREVAILING PARTY**

Plaintiffs are attempting to usurp the legislature and re-cast the fees provision under NRS 38.243 as some sort of sanction that requires frivolousness, akin to sanctions under NRS 18.010(2)(b). But NRS 38.243 is not a sanction statute. It does not require a showing of frivolousness. NRS 38.243 is a prevailing party statute, stating in relevant part: “On application of a **prevailing party** to a contested judicial proceeding...the court may add reasonable attorney’s fees and other reasonable expenses of litigation...” *NRS 38.243(3)*(emphasis added). *See e.g., White v. Baum*, 134 Nev. 1031, 427 P.3d 1038, 2018 WL 4697257 at \*3 (2018)(persuasive value under NRAP 36(c)(3))(objective of NRS 38.243(3) is to compensate fees of the prevailing party).<sup>2</sup>

Moreover, the Nevada Supreme Court has determined that a party is entitled to its fees so long as it is the “prevailing party,” without consideration of the underlying merits relative to the party’s success. *See e.g., Sunlight Tr. v. Hsieh Ying-Man*, 453 P.3d 398, 2019 WL 6840117 at \*1 (Nev. 2019)(unpublished persuasive authority per NRAP 36(c)(3))(directing district court to award defendant fees as a prevailing party solely because the party prevailed, without

<sup>2</sup> In *White*, the Nevada Supreme Court observed:

Appellants finally argue that the district court improperly awarded respondents attorney fees for a first round of motion practice because respondents were not the “prevailing party” in that round of motion practice for purposes of NRS 38.243(3). We disagree. Even if NRS 38.243(3) envisions a motion-by-motion analysis of who is the “prevailing party” as appellants are suggesting, respondents did prevail in the first round of motion practice by virtue of the district court rejecting all of appellants’ arguments and denying their motion to vacate the arbitration award. Accordingly, the district court properly awarded respondents attorney fees for the first round of motion practice.

*White*, 134 Nev. 1031, 427 P.3d 1038, 2018 WL 4697257 at \*3.

1 consideration of the underlying merits of how or why the party prevailed).

2 Thus, the Court should award Defendants their attorneys' fees because they were the  
3 prevailing party in regards to confirming the arbitration award.

4 **II. DEFENDANTS ARE ENTITLED TO FEES EVEN UTILIZING PLAINTIFFS'**  
5 **PROFERRED STANDARD**

6 Likely recognizing there is no dispute regarding Defendants status as the prevailing party,  
7 Plaintiffs attempt to argue, without any legitimate basis, that Defendants' request for attorneys'  
8 fees can only be granted if Plaintiffs presented frivolous arguments. As stated above, this is not  
9 the governing standard. Even if it were, however, the Court still should award Defendants their  
10 attorneys' fees because Plaintiffs' 4/28/22 Brief and recent July 19, 2022 Opposition are  
11 frivolous.

12 **A. Plaintiffs Wholly Failed to Address the Time Limits Contained in NRS**  
13 **38.231 and NRS 38.242**

14 Plaintiffs' 4/28/22 Brief conceded that the Motion was meritorious and never should have  
15 been opposed because Plaintiffs failed to submit any timely motion to vacate, modify, or correct  
16 the Arbitration Award. Indeed, in their Joint Motion to Confirm, Defendants highlighted the fact  
17 that their motion was required to be granted as a matter of law because Plaintiffs had failed to  
18 file any motion to vacate, modify, or correct within the time limits provided by NRS 38.231 or  
19 NRS 38.242. Thus, prior to filing the meritless 4/28/22 Brief and electing to force Defendants to  
20 incur additional attorneys' in drafting a reply brief and attending two hearings on the matter,  
21 Plaintiffs knew they had no valid argument to contest the Joint Motion to Confirm that  
22 Defendants submitted pursuant to NRS 38.239.<sup>3</sup> Indeed, Plaintiffs confirmed this point by

23  
24 <sup>3</sup> This fact pattern stands in direct contrast to that of *Geo-Logic Assocs., Inc. v. Metal Recovery Sols., Inc.*,  
25 No. 317CV00563MMDWGC, 2020 WL 59816, at \*4 (D. Nev. Jan. 6, 2020), where the court refused to  
26 award attorneys' fees under NRS 38.234 (as opposed to NRS 38.243 at issue here), because: (1) the party  
27 moved for an award of attorneys' fees prior to the opposing party filing its opposition to the motion to  
28 enforce the arbitration award and (2) the opposing party presented legitimate concerns regarding the  
award. Here, Defendants waited to move for attorneys' fees until the Court determined that Plaintiffs'  
opposition to the motion to enforce the arbitration award was meritless and entered an order directing  
entry of judgment on the arbitration award.

1 failing to address the statutory time bar at all in the 4/28/22 Brief.<sup>4</sup>

2 **B. The Court Considered and Properly Rejected Plaintiffs' Frivolous Common**  
3 **Law Arguments**

4 In an attempt to sidestep its failure to address the time limits during the briefing on the  
5 Joint Motion to Confirm, Plaintiffs now argue that the statutory time limits do not apply to  
6 common law challenges and that Plaintiffs only sought to raise common law challenges. Even  
7 this argument, however, is frivolous because the Court analyzed and rejected Plaintiffs' baseless  
8 common law challenges. Indeed, the Court

9 Nevada recognizes two common-law standards in evaluating arbitration awards: (1)  
10 whether the award is arbitrary or capricious; and (2) whether the arbitrator manifestly  
11 disregarded the law. *Clark Cnty. Educ. Ass'n v. Clark Cnty. Sch. Dist.*, 122 Nev. 337, 341, 131  
12 P.3d 5, 8 (2006); *Wichinsky v. Mosa*, 109 Nev. 84, 89–90, 847 P.2d 727, 731 (1993). “The  
13 grounds for overturning an arbitration award are extremely limited and that errors of fact or  
14 law—even arguably serious ones—do not justify vacating an award.” Indeed, a “factual finding  
15 is arbitrary and capricious only if it is not supported by substantial evidence in the record” and  
16 “an arbitrator [only] manifestly disregards the law only when he or she *knowingly* disregards  
17 clearly controlling law. *News+Media Cap. Grp. LLC v. Las Vegas Sun, Inc.*, 137 Nev. Adv. Op.  
18 45, 495 P.3d 108, 119 (2021).

19 In their Joint Motion to Confirm at page 7, Defendants raised and argued the two  
20 common law standards. Defendants further addressed those common law standards at pages 4–7  
21 in their 5/6/22 *Reply To Confirm Arbitration Awards*. Finally, the Court's 6/13/22 *Order*  
22 *Granting MMAWC and MMAX's Joint Motion to Confirm Arbitration Awards* expressly  
23 provides that the Court considered both statutory and common law standards in confirming the  
24 awards:

25 IT IS HEREBY ORDERED that the Motion is GRANTED in all  
26 respects. The Court concludes that: (a) no manifest error or  
injustice exist with respect to the June 25, 2021 Summary

27 <sup>4</sup> Thus, Plaintiffs argument in their July 19, 2022 Fees Opposition that they previously made a “good faith  
28 argument to change the law” regarding the timelines to challenge arbitration awards codified in NRS  
Chapter 53 is baseless.

Judgment Award ("06/25/21 Award") and October 4, 2021 Fees and Costs Award ("10/4/21 Award") entered in the subject America Arbitration Association arbitration ("Arbitration"); (b) the 06/25/21 Award and 10/24/21 Award are **not arbitrary or capricious**; and (c) **the Arbitrator did not manifestly disregard the law** with respect to the 06/25/21 Award or the 10/24/21 Award.

*Id. at 2:9-14* (emphasis added).

Thus, as set forth in the 6/13/22 Order, the Court expressly considered Plaintiffs' common law arguments and rejected them because they lacked any merit, thereby justifying an award of attorneys' fees to Defendants even under Plaintiffs' unsupported, requested standard. *See* 7/19/22 Fees Opposition at 2:22-23 (noting that such a statute is designed "to discourage all but the most meritorious challenges of arbitration awards"); 3:6-7 (noting an intent to "discourage re-litigation of valid awards" and providing a narrow avenue for "legitimate concerns about the legal validity of an award.") 3:14-16 ("an award of fees should be used as a tool to discourage meritless or frivolous litigation after the conclusion of an arbitration proceeding").

### **III. DEFENDANTS ARE ENTITLED TO ALL OF THEIR REASONABLE FEES INCURRED IN THE PROCEEDINGS**

Plaintiffs do not challenge the quality of the advocates, character of the work done, results obtained, billing rates of counsel, or the hours spent on the initial Joint Motion to Confirm, reviewing Plaintiffs' baseless 4/28/22 Brief, or preparing and attending for the hearings. Thus, Plaintiffs must be deemed to have conceded that these amounts are reasonable and should be awarded if the Court determines that attorneys' are awardable under NRS 38.243(3). *See* EDCR 2.20(e); EDCR 2.20(i)..

Instead, the lone item Plaintiffs challenge is Defendants' request for attorneys' fees relating to their Joint Reply in Support of its Joint Motion to Confirm.

First, Plaintiffs incorrectly argue that Defendants spent more than seventeen hours drafting their reply in support of the Joint Motion to Confirm. As evidenced by the exhibits to the Joint Fee Motion, Defendants combined to spend fourteen hours preparing the reply brief, not



1 seventeen hours. Furthermore, as noted in the Feder Declaration attached to the Joint Fee  
 2 Motion as Exhibit B, Dickinson Wright reduced this amount by 2.4 hours for which it is not  
 3 seeking reimbursement in relation to the Reply. Motion at Ex. B, ¶ 5. Thus, Defendants are only  
 4 seeking reimbursement for 11.6 hours of time spent addressing the myriad of baseless arguments  
 5 presented by Plaintiffs.

6 Second, Plaintiffs argue that Defendants should be precluded from recovering any  
 7 attorneys' fees for the Reply because the Reply included arguments addressing common law  
 8 issues raised by Plaintiffs in their 4/28/22 Brief. Plaintiffs' nonsensical argument seems to  
 9 suggest that parties should never be permitted to file reply briefs or address arguments raised in  
 10 an opposition. Indeed, if Plaintiffs' argument is accepted, it would bar any party from ever  
 11 recovering attorneys' fees for a reply brief and undercut the entire concept of a reply brief.  
 12 Plaintiffs' argument therefore must be rejected as it fails to offer the Court any basis to reduce  
 13 the amount of attorneys' fees requested by Defendants.

14 **IV. CONCLUSION**

15 For the foregoing reasons and the reasons set forth in the motion, the Court should grant  
 16 Defendants' 7/1/22 *Joint Motion For Attorneys' Fees Per NRS 38.243* in its entirety awarding  
 17 MMAWC and DFP \$6,753.50 and MMAX \$13,290.50.

18  
 19 Respectfully,

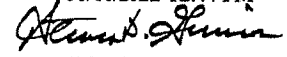
KENNEDY & COUVILLIER, PLLC	DICKINSON WRIGHT PLLC
<p>21 <u>/s/Maximiliano D. Couvillier III</u>            22 Maximiliano D. Couvillier III, Esq.            Nevada Bar No. 7661            23 <u>mcouvillier@kclawnv.com</u>            24 <i>Attorneys for Defendant MMAWC, LLC and</i>  <i>The Nancy And Bruce Deifik Family</i>            25 <i>Partnership LLLP</i></p>	<p><u>/s/Michael N. Feder</u>            Michael N. Feder (NV Bar No. 7332)  <u>MFeder@dickinsonwright.com</u>            Gabriel A. Blumberg (NV Bar No. 12332)  <u>GBlumberg@dickinsonwright.com</u>  <i>Attorneys for MMAX Investment Partners,</i>  <i>Inc. dba Professional Fighters League</i></p>

CERTIFICATE OF SERVICE

I certify that on July 29, 2022, I electronically filed the foregoing document 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  
*Attorney for Plaintiffs*

/s/ Maximiliano D. Couvillier III  
An Employee of KENNEDY & COUVILLIER, PLLC

  
CLERK OF THE COURT

**ORDR**

**KENNEDY & COUVILLIER, PLLC**

Maximiliano D. Couvillier III, Esq. (Bar No. 7661)

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*Attorneys for Defendants MMAWC, LLC and the Deifik Family Partnership LLLP*

**DICKINSON WRIGHT PLLC**

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MFeder@dickinsonwright.com

Blumberg@dickinsonwright.com

*Attorneys for MMAX Investment Partners, Inc. dba Professional Fighters League*

**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

**ORDER & JUDGMENT  
GRANTING MMAWC AND MMAX'S  
JOINT MOTION FOR ATTORNEYS'  
FEES AND COSTS PER NRS 38.243**

On August 3, 2022, the Court heard ("Hearing") the Joint Motion For Attorneys' Fees and Cost Per NRS 38.243 ("Motion") by defendants MMAWC, LLC ("MMAWC"), Bruce Deifik ("Deifik"), and The Nancy And Bruce Deifik Family Partnership LLLP ("DFP") and

KENNEDY & COUVILLIER, PLLC  
3271 E. Warm Springs Rd. ♦ Las Vegas, NV 89120  
Ph. (702) 605-3440 ♦ FAX: (702) 625-6367  
www.kclawnv.com

1 MMAX Investment Partners, Inc. dba Professional Fighters League ("MMAX"). Maximiliano  
2 D. Couvillier III, Esq. appeared on behalf of defendants MMAWC and DFP. Michael N. Feder,  
3 Esq. appeared on behalf of MMAX. Byron Thomas, Esq. appeared on behalf of the plaintiffs  
4 Zion Obi Wan Trust ("Zion") and its trustee Shawn Wright ("Wright")(together Zion and  
5 Wright, "Plaintiffs").

6 The Court has considered the Motion, all related briefs and exhibits, the Court's record,  
7 and the argument of counsel. For good cause appearing,

8 **IT IS HEREBY ORDERED** that the Motion is **GRANTED** in all respects. In addition  
9 to the sums requested in the Motion, which were \$6,750 in attorneys' fees and \$3.50 in costs for  
10 MMAWC and DFP and \$13,280 in attorneys' fees and \$10.50 in costs for MMAX, the Court  
11 further awards MMAWC and DFP an additional \$562.50 in reasonable attorneys' fees in  
12 connection with the Hearing and joint preparation of this order, and an additional \$7.00 in  
13 reasonable costs in connection with this Order. In addition to the sums requested in the Motion,  
14 the Court further awards MMAX additional \$870.00 in reasonable attorneys' fees in connection  
15 with the Hearing and joint preparation of this order.

16 **IT IS FURTHER ORDERED AND ADJUDGED** that Plaintiffs' shall pay MMAWC  
17 and DFP their reasonable attorneys' fees of \$7,312.50; and their reasonable costs of \$10.50, for a  
18 total of **\$7,323.00.**

19 **IT IS FURTHER ORDERED AND ADJUDGED** that Plaintiffs' shall pay MMAX its  
20 reasonable attorneys' fees of \$14,150.00; and its reasonable costs of \$14.00, for a total of  
21 **\$14,164.00.**

22 **THE COURT FINDS** as follows:

23 A. When considering the reasonableness of attorneys' fees to award, courts consider  
24 the following factors (1) the qualities of the advocate: ability, training, education, experience,  
25 professional standing and skill; (2) the character of the work to be done: its difficulty, it  
26 intricacy, its importance, time and skill required, the responsibility imposed and the prominence  
27 and character of the parties where they affect the importance of the litigation; (3) the work  
28 actually performed by the lawyer: the skill, time and attention given to the work; (4) the result:

1 whether the attorney was successful and what benefits were derived. *Brunzell v. Golden Gate*  
2 *Nat. Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969).

3 B. MMAWC and DFP and MMAX are the prevailing parties in connection with  
4 NRS Chapter 38 proceedings to confirm arbitration awards.

5 C. MMAWC and DFP established that they reasonably, necessarily and actually  
6 incurred \$7,312.50 in reasonable attorneys' fees and \$10.50 in reasonable costs for a total of  
7 \$7,323.00 in connection with the NRS Chapter 38 proceedings to confirm arbitration awards.

8 D. MMAX established that it reasonably, necessarily and actually incurred  
9 \$14,150.00 in reasonable attorneys' fees and \$14.00 in reasonable costs for a total of \$14,164.00  
10 in connection with the NRS Chapter 38 proceedings to confirm arbitration awards

11 E. The Court reviewed the briefs, the supporting invoices and declarations of  
12 counsel, and finds that MMAWC, DFP and MMAX have adequately addressed, supported and  
13 established the *Brunzell* factors in support of the award for attorney's fees and costs. The fees  
14 requested by MMAWC, DFP and MMAX are not only reasonable, but modest in comparison to  
15 the quality of work, the quality of their advocates, character of the work and the favorable results  
16 obtained by MMAWC, DFP and MMAX.

17 Dated this 16th day of August, 2022

18 

19 D0A 9E5 68FA ED56 for Judge Allf  
Gloria Sturman  
District Court Judge

20 Dated: August 9, 2022.

21 **Respectfully Submitted By,**

22 /s/: Maximiliano D. Couvillier III

KENNEDY & COUVILLIER, PLLC

Maximiliano D. Couvillier III, Esq., Bar #7661

Attorneys for Defendants MMAWC, LLC and Deifik Family Partnership LLLP

23 /s/: Michael N. Feder

DICKINSON WRIGHT, PLLC

Michael N. Feder, Esq. (Bar No. 7332)

Attorneys for Defendants MMAX Investment Partners, Inc.

26 Dated: August 9, 2022.

**Approved As To Form Only,**

27 /s/: Byron Thomas

Byron Thomas, Esq. (Bar 8906)

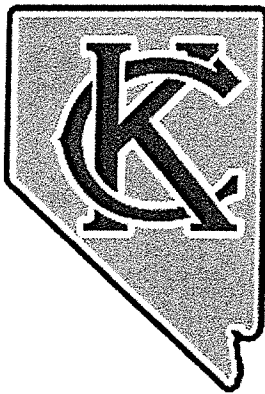
Attorney for Plaintiffs

**From:** Max Couvillier  
**To:** Michael N. Feder; Byron Thomas  
**Cc:** Gabriel A. Blumberg; Dianne M. Kelling  
**Subject:** RE: EXTERNAL: Re: Zion/MMAWC/MMAX  
**Date:** Tuesday, August 9, 2022 3:48:29 PM

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So you have one clean email chain – you have my permission to affix my e-signature and file, too

Thanks



Maximiliano D. Couvillier III, Esq.  
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[www.kclawnv.com](http://www.kclawnv.com)

"In a lawsuit the first to speak seems right, until counsel comes forward to cross-examine."  
Proverbs 18:17

**From:** Michael N. Feder <MFeder@dickinson-wright.com>  
**Sent:** Tuesday, August 9, 2022 3:47 PM  
**To:** Byron Thomas <byronthomaslaw@gmail.com>  
**Cc:** Max Couvillier <mcouvillier@kclawnv.com>; Gabriel A. Blumberg <GBlumberg@dickinson-wright.com>; Dianne M. Kelling <DKelling@dickinson-wright.com>  
**Subject:** Re: EXTERNAL: Re: Zion/MMAWC/MMAX

We will add your signature and mark as to form only. Thanks

Sent from my iPhone please excuse any typos

On Aug 9, 2022, at 3:37 PM, Byron Thomas <[byronthomaslaw@gmail.com](mailto:byronthomaslaw@gmail.com)> wrote:

Yes, as to form

AA718

1 CSERV

2 DISTRICT COURT  
3 CLARK COUNTY, NEVADA  
4

5  
6 Zion Wood Obi Wan Trust,  
Plaintiff(s)

CASE NO: A-17-764118-C

7 vs.

DEPT. NO. Department 27

8 MMAWC LLC, Defendant(s)  
9

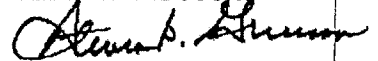
10  
11 **AUTOMATED CERTIFICATE OF SERVICE**

12 This automated certificate of service was generated by the Eighth Judicial District  
13 Court. The foregoing Order was served via the court's electronic eFile system to all  
recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 8/16/2022

15 Michael Feder	mfeder@dickinsonwright.com
16 Gabriel Blumberg	gblumberg@dickinsonwright.com
17 Docket Clerk - LV Litigation	LV_LitDocket@dickinsonwright.com
18 byron Thomas	Byronthomaslaw@gmail.com
19 Byron Thomas	Byronthomaslaw@gmail.com
20 Paul Haire	paul.m.haire@gmail.com
21 Traci Burns	tburns@dickinsonwright.com
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28



1 **NOE**  
2 **KENNEDY & COUVILLIER, PLLC**  
3 Maximiliano D. Couvillier III, Esq.  
4 Nevada Bar No. 7661  
5 3271 E. Warm Springs Rd.  
6 Las Vegas, Nevada 89120  
7 Ph. (702) 605-3440  
8 Fax (702) 625-6367  
9 [mcouvillier@kclawnv.com](mailto:mcouvillier@kclawnv.com)

10 *Attorneys for Defendants MMAWC, LLC and the Deifik Family Partnership LLLP*

11 **DISTRICT COURT**

12 **CLARK COUNTY, NEVADA**

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

17 Plaintiffs,

18 v.

19 MMAWC, LLC d/b/a WORLD SERIES OF  
20 FIGHTING a Nevada limited liability company;  
21 MMAX INVESTMENT PARTNERS, INC. dba  
22 PROFESSIONAL FIGHTERS LEAGUE, a  
23 Delaware corporation; BRUCE DEIFIK, an  
24 individual; CARLOS SILVA, an individual;  
25 NANCY AND BRUCE DEIFIK FAMILY  
26 PARTNERSHIP LLLP, a Colorado limited  
27 liability partnership; KEITH REDMOND, an  
28 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 ENTRY OF  
ORDER & JUDGMENT  
GRANTING MMAWC AND MMAX'S  
JOINT MOTION FOR ATTORNEYS'  
FEES AND COSTS PER NRS 38.243**

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1 Please take Notice that on August 16, 2022, the Court entered **ORDER & JUDGMENT**  
2 **GRANTING MMAWC AND MMAX'S JOINT MOTION FOR ATTORNEYS' FEES**  
3 **AND COSTS PER NRS 38.243.** A filed-stamped copy is attached here as Exhibit 1.

4 Dated: August 17, 2022

5 Respectfully Submitted By,

6 **KENNEDY & COUVILLIER, PLLC**

7  
8 Maximiliano D. Couvillier III

9 Maximiliano D. Couvillier III, Esq., Bar #7661

10 mcouvillier@kclawnv.com

11 *Attorneys for Defendant Keith Redmond*

12 **CERTIFICATE OF SERVICE**

13 I certify that on August 17, 2022, I electronically filed the foregoing Notice with the  
14 Court's electronic filing and service system, which provides electronic service to the following  
15 registered users:

16 Byron Thomas, Esq. (Bar 8906)

3275 S. Jones Blvd., Ste. 104

17 Las Vegas, NV 89146

Byronthomaslaw@gmail.com

18 *Attorney for Plaintiffs*

19 DICKINSON WRIGHT PLLC

20 Michael N. Feder, Esq. (Nevada Bar No. 7332)

Gabriel A. Blumberg, Esq. (Nevada Bar No. 12332)

21 3883 Howard Hughes Parkway, Suite 800

Las Vegas, Nevada 89169-0965

22 Ph: (702) 550-4400/Fax: (844) 670-6009

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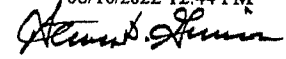
24 *Attorneys for MMAX Investment Partners, Inc. dba Professional Fighters*  
25 *League*

26 /s/ Maximiliano D. Couvillier III

27 An Employee of KENNEDY & COUVILLIER, PLLC

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**EXHIBIT 1**  
**Filed-Stamped Copy of**  
**ORDER & JUDGMENT GRANTING MMAWC AND MMAX'S**  
**JOINT MOTION FOR ATTORNEYS' FEES AND COSTS PER**  
**NRS 38.243**

  
CLERK OF THE COURT

**ORDR**

**KENNEDY & COUVILLIER, PLLC**

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*Attorneys for Defendants MMAWC, LLC and the Deifik Family Partnership LLLP*

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*Attorneys for MMAX Investment Partners, Inc. dba Professional Fighters League*

**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  
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Plaintiffs,

v.

MMAWC, LLC d/b/a WORLD SERIES OF  
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Defendants.

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

**ORDER & JUDGMENT  
GRANTING MMAWC AND MMAX'S  
JOINT MOTION FOR ATTORNEYS'  
FEES AND COSTS PER NRS 38.243**

On August 3, 2022, the Court heard ("Hearing") the Joint Motion For Attorneys' Fees and Cost Per NRS 38.243 ("Motion") by defendants MMAWC, LLC ("MMAWC"), Bruce Deifik ("Deifik"), and The Nancy And Bruce Deifik Family Partnership LLLP ("DFP") and

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www.kclawnv.com

1 MMAX Investment Partners, Inc. dba Professional Fighters League ("MMAX"). Maximiliano  
2 D. Couvillier III, Esq. appeared on behalf of defendants MMAWC and DFP. Michael N. Feder,  
3 Esq. appeared on behalf of MMAX. Byron Thomas, Esq. appeared on behalf of the plaintiffs  
4 Zion Obi Wan Trust ("Zion") and its trustee Shawn Wright ("Wright")(together Zion and  
5 Wright, "Plaintiffs").

6 The Court has considered the Motion, all related briefs and exhibits, the Court's record,  
7 and the argument of counsel. For good cause appearing,

8 **IT IS HEREBY ORDERED** that the Motion is **GRANTED** in all respects. In addition  
9 to the sums requested in the Motion, which were \$6,750 in attorneys' fees and \$3.50 in costs for  
10 MMAWC and DFP and \$13,280 in attorneys' fees and \$10.50 in costs for MMAX, the Court  
11 further awards MMAWC and DFP an additional \$562.50 in reasonable attorneys' fees in  
12 connection with the Hearing and joint preparation of this order, and an additional \$7.00 in  
13 reasonable costs in connection with this Order. In addition to the sums requested in the Motion,  
14 the Court further awards MMAX additional \$870.00 in reasonable attorneys' fees in connection  
15 with the Hearing and joint preparation of this order.

16 **IT IS FURTHER ORDERED AND ADJUDGED** that Plaintiffs' shall pay MMAWC  
17 and DFP their reasonable attorneys' fees of \$7,312.50; and their reasonable costs of \$10.50, for a  
18 total of **\$7,323.00.**

19 **IT IS FURTHER ORDERED AND ADJUDGED** that Plaintiffs' shall pay MMAX its  
20 reasonable attorneys' fees of \$14,150.00; and its reasonable costs of \$14.00, for a total of  
21 **\$14,164.00.**

22 **THE COURT FINDS** as follows:

23 A. When considering the reasonableness of attorneys' fees to award, courts consider  
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27 and character of the parties where they affect the importance of the litigation; (3) the work  
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whether the attorney was successful and what benefits were derived. *Brunzell v. Golden Gate Nat. Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969).

B. MMAWC and DFP and MMAX are the prevailing parties in connection with NRS Chapter 38 proceedings to confirm arbitration awards.

C. MMAWC and DFP established that they reasonably, necessarily and actually incurred \$7,312.50 in reasonable attorneys' fees and \$10.50 in reasonable costs for a total of \$7,323.00 in connection with the NRS Chapter 38 proceedings to confirm arbitration awards.

D. MMAX established that it reasonably, necessarily and actually incurred \$14,150.00 in reasonable attorneys' fees and \$14.00 in reasonable costs for a total of \$14,164.00 in connection with the NRS Chapter 38 proceedings to confirm arbitration awards

E. The Court reviewed the briefs, the supporting invoices and declarations of counsel, and finds that MMAWC, DFP and MMAX have adequately addressed, supported and established the *Brunzell* factors in support of the award for attorney's fees and costs. The fees requested by MMAWC, DFP and MMAX are not only reasonable, but modest in comparison to the quality of work, the quality of their advocates, character of the work and the favorable results obtained by MMAWC, DFP and MMAX.

Dated this 16th day of August, 2022



D0A 9E5 68FA ED56 for Judge Allf  
Gloria Sturman  
District Court Judge

Dated: August 9, 2022.

**Respectfully Submitted By,**

/s/: Maximiliano D. Couvillier III

KENNEDY & COUVILLIER, PLLC

Maximiliano D. Couvillier III, Esq., Bar #7661

*Attorneys for Defendants MMAWC, LLC and Deifik Family Partnership LLLP*

/s/: Michael N. Feder

DICKINSON WRIGHT, PLLC

Michael N. Feder, Esq. (Bar No. 7332)

*Attorneys for Defendants MMAX Investment Partners, Inc.*

Dated: August 9, 2022.

**Approved As To Form Only,**

/s/: Byron Thomas

Byron Thomas, Esq. (Bar 8906)

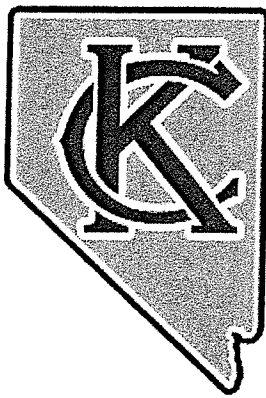
*Attorney for Plaintiffs*

**From:** Max Couvillier  
**To:** Michael N. Feder; Byron Thomas  
**Cc:** Gabriel A. Blumberg; Dianne M. Kelling  
**Subject:** RE: EXTERNAL: Re: Zion/MMAWC/MMAX  
**Date:** Tuesday, August 9, 2022 3:48:29 PM

---

So you have one clean email chain – you have my permission to affix my e-signature and file, too

Thanks



Maximiliano D. Couvillier III, Esq.  
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[www.kclawnv.com](http://www.kclawnv.com)

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Proverbs 18:17

**From:** Michael N. Feder <MFeder@dickinson-wright.com>  
**Sent:** Tuesday, August 9, 2022 3:47 PM  
**To:** Byron Thomas <byronthomaslaw@gmail.com>  
**Cc:** Max Couvillier <mcouvillier@kclawnv.com>; Gabriel A. Blumberg <GBlumberg@dickinson-wright.com>; Dianne M. Kelling <DKelling@dickinson-wright.com>  
**Subject:** Re: EXTERNAL: Re: Zion/MMAWC/MMAX

We will add your signature and mark as to form only. Thanks

Sent from my iPhone please excuse any typos

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Yes, as to form

1 CSERV

2 DISTRICT COURT  
3 CLARK COUNTY, NEVADA

4  
5  
6 Zion Wood Obi Wan Trust,  
Plaintiff(s)

CASE NO: A-17-764118-C

7 vs.

DEPT. NO. Department 27

8  
9 MMAWC LLC, Defendant(s)

10  
11 **AUTOMATED CERTIFICATE OF SERVICE**

12 This automated certificate of service was generated by the Eighth Judicial District  
13 Court. The foregoing Order was served via the court's electronic eFile system to all  
recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 8/16/2022

15 Michael Feder	mfeder@dickinsonwright.com
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