

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

**USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 8/12/15**

MEEHANCOMBS GLOBAL CREDIT,
OPPORTUNITIES MASTER FUND, LP, *et al.*,

Plaintiffs,

v.

CAESARS ENTERTAINMENT CORPORATION
and CAESARS ENTERTAINMENT OPERATING
COMPANY, INC.,

Defendants.

No. 14-cv-7091-SAS

ECF Case

**STIPULATION CONCERNING THE AUTHENTICITY OF DOCUMENTS AND
ELECTRONICALLY STORED INFORMATION PRODUCED IN DISCOVERY
BY CFIP ULTRA MASTER FUND LTD. AND SB 4 CF LLC**

This Stipulation ("Stipulation") is entered into by and among (i) Caesars Entertainment Corp. ("CEC"), (ii) CFIP Ultra Master Fund Ltd. ("CFIP"), and (iii) SB 4 CF LLC ("SB4," and together with CFIP, "CFIP/SB4") (each a "Party" and collectively, the "Parties"). The Parties hereby stipulate, by and through their respective attorneys of record, and agree to the terms and conditions set forth below, as evidenced by the endorsements of their respective counsel, and good cause having been shown,

WHEREAS, CFIP/SB4 produced, and may continue to produce, electronically stored information and documents in response to document requests served in accordance with Rule 34 of the Federal Rules of Civil Procedure ("FRCP"),

WHEREAS, CEC requested that CFIP/SB4 stipulate to the authenticity of certain documents that were produced by CFIP/SB4 in the above-captioned action, which is in coordinated discovery proceedings with *Danner v. Caesars Entertainment Corp.*, 1:14-cv-7973 (SAS) (S.D.N.Y.), *BOKF, N.A. v. Caesars Entertainment Corp.*, 1:15-cv-1561 (SAS)

(S.D.N.Y.), *UMB Bank, N.A. v. Caesars Entertainment Corp.*, 1:15-cv-04634 (SAS) (S.D.N.Y.), and *Wilmington Savings Fund Society, FSB v. Caesars Entertainment Corp.*, C.A. No. 10004 (VCG) (Del. Ch. Court) (together, the “Coordinated Actions”), and

WHEREAS, the Parties are entering into this Stipulation on the terms set forth below.

NOW THEREFORE, as evidenced by their endorsements, the Parties stipulate and agree as follows:

1. Each Party agrees that the documents produced by CFIP/SB4 in the above-captioned action bearing the document control numbers described in paragraph 4, if offered solely in the above-captioned action or the Coordinated Actions as exhibits during depositions, at trial, or in any summary judgment motions, oppositions to motions for summary judgment or replies or sur-replies in further support of, or in opposition to, their motions for summary judgment, are “authentic.”

2. For the purposes of this Stipulation, the term “Document” shall have the meaning ascribed to it by FRCP 34.

3. For the purposes of this Stipulation, the term “electronically-stored-information” (“ESI”) shall have the meaning ascribed to it by FRCP 34.

4. Documents or ESI produced by CFIP/SB4 in this litigation bearing the following document control numbers shall be presumed authentic within the meaning of Federal Rule of Evidence 901(a):

- a. CFIP-SDNY-0005333 to CFIP-SDNY-0005340;
- b. CFIP-SDNY-0006630 to CFIP-SDNY-0006633;
- c. CFIP-SDNY-0007064 to CFIP-SDNY-0007066;

d. CFIP-SDNY-0012662 to CFIP-SDNY-0012663; and

e. CFIP-SDNY-0012656 to CFIP-SDNY-0012659.

5. This Stipulation is in effect regardless of whether CFIP/SB4 remains as a plaintiff in the above-captioned action, unless and until the Parties agree in writing to terminate this Stipulation.

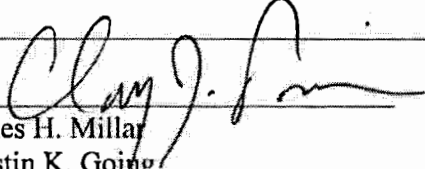
6. Notwithstanding this Stipulation, the right to object to the admissibility of such documents for any reason other than authenticity is reserved and preserved by the Parties.

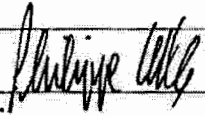
7. This Stipulation has no effect on, and shall not apply to, a producing Party's use or disclosure of its own Documents or ESI for any purposes whatsoever.

8. The United States District Court for the Southern District of New York retains exclusive jurisdiction to enforce, modify, or vacate all or any portion of this Stipulation upon appropriate motion by a party in interest.

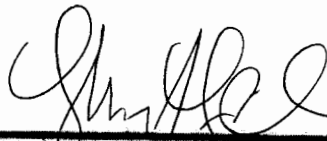
9. This Stipulation may be executed in separate identical counterparts, each of which shall constitute an original, and all of which shall constitute a single document, and the proof of which will only require production or accounting for one (1) complete set of counterparts. Further, this Stipulation may be executed by fax or Adobe pdf transfer of an originally signed document, each of which shall be as fully binding on a Party or the Parties as an original document.

[SIGNATURE BLOCKS ON THE FOLLOWING PAGE]

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Dated: August 11, 2015	Dated: August 11, 2015

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SO ORDERED:



U.S.D.J. *rne* *8/12/15*