

IN THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

NO. 11-16358

RIGHTHAVEN LLC,
Appellant

v.

CENTER FOR INTERCULTURAL ORGANIZING, and KAYSE JAMA,
Appellees

**MOTION FOR EXTENSION OF TIME TO FILE OPENING BRIEF
PURSUANT TO CIRCUIT RULE 31-2.2(b)**

Appeal from the United States District Court for the District of Nevada
Case No. 2:11-cv-01322-JCM-LRL

SHAWN A. MANGANO, LTD.
Shawn A. Mangano, Esq.
shawn@manganolaw.com
Nevada Bar No. 6730
8367 West Flamingo Road, Suite 100
Las Vegas, Nevada 89147
Phone: (702) 304-0432
Fax: (702) 922-3851

Attorney for Appellant Righthaven LLC

Appellant Righthaven LLC (“Righthaven”) hereby moves for an extension of time to file its opening brief pursuant to Circuit Rule 31-2.2(b) (the “Motion”). The Motion requests a short 8-day extension of time for Righthaven to file its opening brief in this appeal. If the Motion is granted, Righthaven will file its opening brief on or before November 22, 2011.

Righthaven’s request for an extension of time is supported by diligence and substantial need. Righthaven’s counsel in this matter has been advised that he will be undergoing a surgical procedure tomorrow, November 15, 2011. Due to scheduling conflicts between the surgical center and his surgeon, counsel was only recently advised that the procedure will be performed tomorrow morning. As a result, counsel has diligently worked to adjust his calendar and to tend to urgent matters before undergoing the operation. He has additionally been required to tend to pre-operative issues and administrative matters in a short period of time that has resulted in his inability to meet the November 14, 2011 opening brief filing date in this matter. In view of counsel’s surgical procedure and his anticipated recovery time, an 8-day extension of time is sought through this filing. If granted, Righthaven’s opening brief will be due on November 22, 2011. Opposing counsel has been advised of the foregoing circumstances and consents to the requested extension of time.

Dated this 14th day of November, 2011.

SHAWN A. MANGANO, LTD.

By: /s/ Shawn A. Mangano
SHAWN A. MANGANO, ESQ.
Nevada Bar No. 6730
8367 West Flamingo Road, Suite 100
Las Vegas, Nevada 89147

Attorney for Appellant Righthaven LLC