

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No.: 1:11-cv-00553-JLK

RIGHTHAVEN LLC, a Nevada limited-liability company,

Plaintiff,

v.

PANTHEON PROMOTIONS, INC., a Texas corporation; and
NATHANIEL BACON, an individual,

Defendant.

MOTION TO WITHDRAW AS COUNSEL

STEVEN G. GANIM, Esq. respectfully moves this Court for an Order permitting Steven G. Ganim (“Mr. Ganim”), who has appeared in these proceedings, to withdraw as counsel for Righthaven LLC (“Righthaven”), in the above-styled matter, pursuant to D.C.COLO.LCivR 83.3 (D) and Rule 1.16 of the Colorado Rules of Professional Conduct. In support thereof, the undersigned states as follows:

1. Mr. Ganim is no longer employed by Righthaven, due to recently being laid off.
2. Pursuant to Rule 1.16(a)(3) of the Colorado Rules of Professional Conduct, a lawyer is required to withdraw from the representation of a client if the lawyer is discharged.
3. Mr. Ganim has complied with the notification requirements of D.C.COLO.LCivR 83.3 (D). Please see the Notice of Withdraw of Appearance, attached hereto as Exhibit “1”. Service of the Notice of Withdraw was not effectuated upon the defendants in the matter, as the defendants have not been served or otherwise appeared, and the undersigned does not have any means of communicating with defendants.

4. No party will be prejudiced or otherwise affected by Mr. Ganim's withdrawal, as Righthaven is currently represented by other counsel.

5. The relief requested in this Motion is sought in good faith and not for the purposes of delay.

RULE 7.1(A) CERTIFICATION

Mr. Ganim has been unable to confer with any of the defendant in this matter, as none of the defendants have been served or otherwise appeared, and the undersigned does not have any means of communicating the defendants.

WHEREFORE, the undersigned counsel respectfully requests to withdraw from representing Righthaven in the instant matter.

Dated this 8th day of September, 2011.

By: /s/ Steven G. Ganim
STEVEN G. GANIM, ESQ.
Post Office Box 230812
Las Vegas, Nevada 89105
Tel: (702) 324.5347
sgganim@gmail.com

CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that on this 8th day of September, 2011, I caused a copy of the MOTION TO WITHDRAW AS COUNSEL to be served via the Court's CM/ECF system, as well as depositing a copy of the foregoing in the United States Mail to the following persons:

Righthaven LLC
4475 South Pecos Road
Las Vegas, Nevada 89121

/s/ Steven G. Ganim