

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

Civil Action No.: 1:11-cv-00811-JLK

RIGHTHAVEN LLC, a Nevada limited-liability company,

Plaintiff,

v.

BUZZFEED, INC., a Delaware corporation;
JONAH PERETTI, an individual; and
GAVON LAESSIG, an individual,

Defendants.

UNOPPOSED 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”.
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 conferred with Kathryn Barrett, Esq., counsel for defendants in this matter, concerning the relief requested herein. Defendants do not oppose this Motion.

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

Dated this 11th day of September, 2011.

By: /s/ Steven G. Ganim
STEVEN G. GANIM, ESQ.
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Las Vegas, Nevada 89105
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CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that on this 11th 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:

Kathryn Reed Debord, Esq.
Peter John Korneffel, Jr., Esq.
Kathryn Barrett, Esq.
Brownstein Hyatt Farber Schreck LLP
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Denver, Colorado 80202-4432

Righthaven LLC
4475 South Pecos Road
Las Vegas, Nevada 89121

/s/ Steven G. Ganim