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 6 **UNITED STATES DISTRICT COURT**  
 7 **DISTRICT OF NEVADA**

8 RIGHTHAVEN LLC, a Nevada limited-  
 9 liability company,

10 Plaintiff,

11 v.

12 VOTE FOR THE WORST, LLC, a Utah  
 13 limited-liability company; NATHAN E.  
 PALMER, an individual; and DAVID J.  
 14 DELLA TERZA, an individual,

15 Defendants.

Case No.: 2:10-cv-01045-KJD-GWF

**MOTION AND PROPOSED ORDER TO  
 WITHDRAW AS COUNSEL OF RECORD  
 WITH CERTIFICATE OF SERVICE**

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 18 ANNE E. PIERONI, ESQ. respectfully moves this court for an order permitting  
 19 Anne Pieroni, Esq. ("Ms. Pieroni"), who has appeared in these proceedings, to withdraw as  
 20 counsel for Righthaven LLC ("Righthaven"), in the above captioned matter, pursuant to Local  
 21 Rule IA 10-6, S.C.R 46, and N.R.P.C 1.16 (b)(1) and (7). This Motion is made and based upon  
 22 the Memorandum of Points and Authorities submitted herein, as well as the pleadings and papers  
 23 on file herein.

24 **MEMORANDUM OF POINTS AND AUTHORITIES**

25 Ms. Pieroni is no longer employed as counsel at Righthaven. Furthermore, Ms. Pieroni  
 26 was not retained to represent Righthaven as outside counsel, in the above captioned matter, or  
 27 any other pending case or matter before this Court on behalf of Righthaven. The Local Rule IA  
 28 10-6 (a) provides that "No attorney may withdraw after appearing in a case except by leave of  
 court after notice served on the affected client and opposing counsel." Righthaven received

1 notice of Ms. Pieroni's intent to withdraw from this case, and all other Righthaven cases, upon  
2 Ms. Pieroni's final week of employment with Righthaven.

3 Additionally, Defendants' counsel in this case will receive notice of this Motion to  
4 Withdraw via the CM/ECF system, pursuant to the certificate of service attached herein.  
5 Additionally, Local Rule IA 10-6 (e) provides that "no withdrawal... shall be approved if delay of  
6 discovery, the trial or any hearing in the case would result." Here, no delay of any kind will  
7 result from Ms. Pieroni's withdrawal because Righthaven is represented in this matter by  
8 outside counsel, Shawn A. Mangano, Esq., having previously appeared before this Court, as well  
9 as various in-house counsel employed by Righthaven. Ms. Pieroni's withdrawal will not  
10 prejudice either party or delay any proceeding in this matter.

11 **CONCLUSION**

12 For the reasons set forth above, Ms. Pieroni respectfully moves this Court to enter an  
13 Order approving the withdrawal of Ms. Pieroni as a counsel of record for Righthaven in the  
14 above captioned matter.

15 Dated this 6<sup>th</sup> day of April, 2011.

16 By: /s/ Anne E. Pieroni, Esq.  
17 ANNE E. PIERONI, ESQ.  
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22 Tel.: (702) 527-5900

23 IT IS SO ORDERED:

24 \_\_\_\_\_  
25 UNITED STATES DISTRICT JUDGE

26 DATED: \_\_\_\_\_  
27  
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**CERTIFICATE OF SERVICE**

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that on this 6<sup>th</sup> day of April, 2011, I caused a copy of the **MOTION AND PROPOSED ORDER TO WITHDRAW AS COUNSEL OF RECORD WITH CERTIFICATE OF SERVICE** to be served by the Court's CM/ECF system.

By: /s/ Anne Pieroni

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