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6 Attorney for Defendants,  
 7 *Vote for the Worst LLC,*  
 8 *Nathan E. Palmer, and*  
 9 *David J. Della Terza*

10 **UNITED STATES DISTRICT COURT**  
 11 **DISTRICT OF NEVADA**

12 RIGHTHAVEN, LLC, a Nevada limited  
 liability company,

Case No. 2:10-cv-01045

13 Plaintiff,

**PARTIES' JOINT STIPULATION AND  
 REQUEST FOR LEAVE TO EXTEND  
 TIME TO FILE DISCOVERY PLAN**

14 v.

**(FIRST REQUEST)**

15 VOTE FOR THE WORST, LLC, an Utah  
 limited-liability company, NATHAN E.  
 16 PALMER, an individual; and DAVID J. DELLA  
 17 TERZA, an individual

18 Defendants.

19 **PARTIES' JOINT STIPULATION  
 AND REQUEST FOR LEAVE TO EXTEND TIME TO FILE DISCOVERY PLAN**

20 Defendants Vote for the Worst LLC, Nathan E. Palmer and David J. Della Terza, by and  
 21 through their counsel, Randazza Legal Group, and Plaintiff Righthaven LLC, by and through its  
 22 counsel Shawn A. Mangano, hereby stipulate to extending the time to file a discovery plan to one  
 23 (1) calendar week after the Court decides the Motion to Dismiss (Doc. #33) and related briefing  
 24 (Docs. # 40, 43, 44).

25 The parties therefore move this Court to amend its Order filed June 10, 2011 (Doc. # 47)  
 26 instructing the parties to file a discovery plan by June 20, 2011. The parties agree that such an  
 27 event-based extension for the discovery order's filing would be in the interest of the parties and  
 28 judicial economy, as the Court's disposition of the pending motion to dismiss may obviate the

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1 need for discovery entirely. The parties do not request this leave from the Court for any  
2 improper to dilatory purpose.

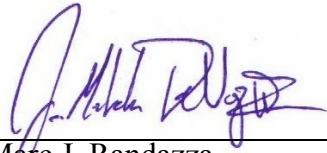
3 Dated: June 13, 2011

4 Respectfully Submitted,

5 SHAWN A. MANGANO, LTD.

RANDAZZA LEGAL GROUP

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8 By: /s/ Shawn A. Mangano  
9 Shawn A. Mangano  
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18 Attorney for Plaintiff,  
19 *Righthaven LLC*

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Marc J. Randazza  
J. Malcolm DeVoy  
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Attorney for Defendants,  
*Vote for the Worst LLC,*  
*Nathan E. Palmer, and*  
*David J. Della Terza*

**IT IS SO ORDERED:**

\_\_\_\_\_  
UNITED STATES DISTRICT COURT JUDGE

DATED: \_\_\_\_\_