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Attorney for Righthaven LLC

## UNITED STATES DISTRICT COURT

## DISTRICT OF NEVADA

RIGHTHAVEN LLC, a Nevada limited-liability company,

Plaintiff,

v.

DEMOCRATIC UNDERGROUND, LLC, a District of Columbia limited-liability company; and DAVID ALLEN, an individual,

Defendants.

Case No.: 2:10-cv-01356-RLH-RJJ

STIPULATION AND ORDER FOR EXTENSION OF TIME FOR RIGHTHAVEN LCC TO FILE RESPONSE TO DEFENDANTS FIRST MOTION TO COMPEL THE PRODUCTION OF DOCUMENTS

(First Request)

DEMOCRATIC UNDERGROUND, LLC, a District of Columbia limited-liability company,

Counterclaimant,

22 **v**.

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RIGHTHAVEN LLC, a Nevada limitedliability company; and STEPHENS MEDIA LLC, a Nevada limited-liability company,

Counterdefendants.

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## Case 2:10-cv-01356-RLH -GWF Document 103 Filed 05/12/11 Page 2 of 3

IT IS HEREBY STIPULATED BETWEEN Plaintiff/Counterdefendant, Righthaven LLC ("Righthaven"), through its attorneys of record, Defendant/Counterclaimant, Democratic Underground, LLC ("Democratic Underground") and Defendant David Allen (collectively referred to as "Defendants"), through their attorneys of record, and Counterdefendant, Stephens Media LLC ("Stephens Media"), through its attorneys of record, that Righthaven's Response to Democratic Underground's Motion to Compel (Doc. # 95) shall be due on or before May 17, 2011. In view of this extension of time, Democratic Underground shall have a two-day extension of time to file its reply to Righthaven's response.

This stipulation for extension of time is being granted to accommodate Righthaven's counsel's schedule, which includes attendance at deposition testimony and several substantive responses to dispositive motions in other pending actions. This stipulation is sought in good faith and not for purposes of delay.

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1	Dated this 12 <sup>th</sup> day of May, 2011.	
2	FENWICK & WEST	SHAWN A. MANGANO, LTD.
2 3 4 5 6 7 8 9 10 11 12 13 14 15	By: /s/ Laurence F. Pulgram LAURENCE F. PULGRAM, ESQ. lpulgram@fenwick.com CLIFFORD C. WEBB, ESQ. cwebb@fenwick.com 555 California Street, 12 <sup>th</sup> Floor San Francisco, California 94104  KURT OPSAHL, ESQ. CORYNNE MCSHERRY, ESQ. ELECTRONIC FRONTIER FOUNDATION 454 Shotwell Street San Francisco, California 94110  CHAD A. BOWERS, ESQ. Nevada Bar No. 7283 CHAD A. BOWERS, LTD. bowers@lawyer.com 3202 West Charleston Boulevard Las Vegas, Nevada 89102  Attorneys for Democratic Underground, LLC	By: /s/ Shawn A. Mangano SHAWN A. MANGANO, ESQ. Nevada Bar No. 6730 shawn@manganolaw.com 9960 West Cheyenne Avenue, Suite 170 Las Vegas, Nevada 89129-7701  Attorney for Righthaven LLC  CAMPBELL & WILLIAMS  By: /s/ J. Colby Williams J. COLBY WILLIAMS, ESQ. Nevada Bar No. 5549 jcw@campbellandwilliams.com DONALD J. CAMPBELL, ESQ. Nevada Bar No. 1216 djc@campbellandwilliams.com 700 South Seventh Street Las Vegas, Nevada 89101
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21	IT IS S	O ORDERED:
22		Leonge Foley on.
23		GE FOLEY, JR. D STATES MAGISTRAGE JUDGE
25	DATEI	<b>D:</b> May 13, 2011
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