

1 LAURENCE F. PULGRAM (CA State Bar No. 115163) (*pro hac vice*)
lpulgram@fenwick.com
 2 CLIFFORD C. WEBB (CA State Bar No. 260885) (*pro hac vice*)
cwebb@fenwick.com
 3 JENNIFER J. JOHNSON (CA State Bar No. 252897) (*pro hac vice*)
jjjohnson@fenwick.com
 4 FENWICK & WEST LLP
 555 California Street, 12th Floor
 5 San Francisco, California 94104
 Telephone: (415) 875-2300
 6 Facsimile: (415) 281-1350

7 KURT OPSAHL (CA State Bar No. 191303) (*pro hac vice*)
kurt@eff.org
 8 CORYNNE MCSHERRY (CA State Bar No. 221504) (*pro hac vice*)
corynne@eff.org
 9 ELECTRONIC FRONTIER FOUNDATION
 454 Shotwell Street
 10 San Francisco, California 94110
 Telephone: (415) 436-9333
 11 Facsimile: (415) 436-9993

12 CHAD BOWERS (NV State Bar No. 7283)
bowers@lawyer.com
 13 CHAD A. BOWERS, LTD
 3202 West Charleston Boulevard
 14 Las Vegas, Nevada 89102
 Telephone: (702) 457-1001
 15 Attorneys for Defendant and Counterclaimant
 16 DEMOCRATIC UNDERGROUND, LLC, and
 Defendant DAVID ALLEN

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

19 RIGHTHAVEN LLC, a Nevada limited liability company, Case No. 2:10-01356-RLH (GWF)
 Plaintiff,

v.

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

**REPLY DECLARATION OF
 JENNIFER J. JOHNSON IN
 SUPPORT OF DEFENDANTS'
 FIRST MOTION TO COMPEL
 THE PRODUCTION OF
 DOCUMENTS AGAINST
 RIGHTHAVEN**

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

v.

27 RIGHTHAVEN LLC, a Nevada limited liability company,
 and STEPHENS MEDIA LLC, a Nevada limited-liability
 28 company,
 Counterdefendants.

REPLY DECL. OF JENNIFER JOHNSON
 DECL. ISO DEFENDANTS' MOTION TO
 COMPEL AGAINST RIGHTHAVEN

CASE NO. 2:10-CV-01356-RLH (GWF)

1 I, Jennifer J. Johnson, declare as follows:

2 1. I am an attorney licensed to practice law in the state of California and an associate
3 at Fenwick & West, LLP, counsel for Defendant/Cross-Complainant Democratic Underground,
4 LLC and Defendant David Allen (hereinafter "Defendants") in this matter. I have personal
5 knowledge of the facts stated in this declaration, and if called upon to do so, could and would
6 competently testify thereto.

7 2. On May 17, 2011, Righthaven served Defendants with "Plaintiff's Fifth
8 Supplemental Disclosures Pursuant to Rule 26(A)(1)(A) of the Federal Rules of Civil Procedure,"
9 which attached three documents. These disclosures were the fourth set of supplemental
10 disclosures received by Defendants from Righthaven. Attached hereto as Exhibit A is a true and
11 correct copy of "Plaintiff's Fifth Supplemental Disclosures Pursuant to Rule 26(A)(1)(A) of the
12 Federal Rules of Civil Procedure," Exhibit 1 to which is a letter relating to a different defendant
13 and different website.

14 3. On May 25, 2011, Righthaven served Defendants with "Plaintiff's Sixth
15 Supplemental Disclosures Pursuant to Rule 26(A)(1)(A) of the Federal Rules of Civil Procedure,"
16 which attached three documents. These disclosures were the fifth set of supplemental disclosures
17 received by Defendants from Righthaven. Attached hereto as Exhibit B is a true and correct copy
18 of "Plaintiff's Sixth Supplemental Disclosures Pursuant to Rule 26(A)(1)(A) of the Federal Rules
19 of Civil Procedure."

20 I declare under penalty of perjury under the laws of the United States that the foregoing is
21 true and correct. Executed on May 27, 2011, in San Francisco, California.

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/s/ Jennifer J. Johnson
JENNIFER J. JOHNSON