

EXHIBIT B

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5 *Attorney for Righthaven LLC*

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

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

11
12 Plaintiff,

13 v.

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

16 Defendants.

17
18 DEMOCRATIC UNDERGROUND, LLC, a
District of Columbia limited-liability
19 company,

20 Counterclaimant,

21 v.

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

24 Counterdefendants.

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

**PLAINTIFF'S SIXTH SUPPLEMENTAL
DISCLOSURES PURSUANT TO RULE
26(A)(1)(A) OF THE FEDERAL RULES
OF CIVIL PROCEDURE**

25
26 Plaintiff/Counterdefendant Righthaven LLC ("Righthaven") makes the following sixth
27 supplement to its initial disclosures pursuant to the requirements of Rule 26(a)(1)(A) of the
28 Federal Rules of Civil Procedure.

1 **I. DESCRIPTION BY CATEGORY AND LOCATION OF DOCUMENTS,**
2 **ELECTRONICALLY STORED INFORMATION, AND TANGIBLE THINGS IN**
3 **RIGHTHAVEN’S POSSESSION, CUSTODY, OR CONTROL THAT**
4 **RIGHTHAVEN MAY USE TO SUPPORT RIGHTHAVEN’S CLAIMS**

5 Righthaven supplements its prior initial, either amended or supplemental, disclosures by
6 identifying, as required under the Federal Rules of Civil Procedure, the following documents that
7 it may use to support the claims and defenses at issue in this action, which are being concurrently
8 produced in PDF format as indicated by the exhibit reference associated with same:

- 9 1. Original assignment of the literary work that is the subject of the instant suit (the
10 “Work”), pages 2 – 3 (Exhibit 1);
- 11 2. Subsequent assignment of the Work, pages 5 – 6 (Exhibit 2); and
- 12 3. Case summary from the United States Copyright Office of the copyright
13 registration of the Work (the “Work”), page 8 (Exhibit 3);

14 Righthaven reserves the right to supplement the foregoing disclosures as discovery
15 continues.

16 Dated this 25th day of May, 2011.

17 SHAWN A. MANGANO, LTD.

18 By: Shawn A. Mangano
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CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that I am an employee of Righthaven LLC and that on this 25th day of May, 2011, I caused **PLAINTIFF’S SIXTH SUPPLEMENTAL DISCLOSURES PURSUANT TO RULE 26(A)(1)(A) OF THE FEDERAL RULES OF CIVIL PROCEDURE** to be served to be served in PDF format via electronic mail to following persons:

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