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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.

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

Counterclaimant,

v.

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

Counterdefendants.

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

RIGHTHAVEN LLC'S NOTICE OF COMPLIANCE WITH JULY 14, 2011 ORDER

1 Righthaven LLC (“Righthaven”) hereby advises of its compliance with the Court’s July 14,
2 2011 (Doc. # 138, the “July 14th Order”) as set forth herein.

3 The July 14th Order required Righthaven to produce a copy of the Strategic Alliance
4 Agreement (the “SAA”) to every party in every currently pending case, even those on appeal, in any
5 jurisdiction where the copyright infringement allegations involve content assigned by Stephens
6 Media, LLC (“Stephens Media”). (Doc. # 138). The July 14th Order also required Righthaven to
7 provide a copy of the transcript from the July 14, 2011 Order to Show Cause hearing in the event the
8 Court did not issue a formal written Order. (*Id.*) Righthaven was additionally required to provide a
9 copy of the Court’s Order dismissing Righthaven’s claims for lack of standing (Doc. # 116). (*Id.*)
10 Furthermore, Righthaven was ordered to advise the United States District Court for the District of
11 Colorado about the July 14th Order. (*Id.*) Payment of a sanction fee in the amount of \$5,000 was
12 also ordered.

13 Righthaven has complied with the July 14th Order as follows: (1) it has sent copies of the
14 Court’s dismissal for lack of standing, the SAA and the July 14, 2011 OSC hearing transcript to
15 counsel appearing in all currently pending actions involving Stephens Media content; (2) it has sent
16 copies of the Court’s dismissal for lack of standing, the SAA and the July 14, 2011 OSC hearing
17 transcript to all addresses on file for all *pro se* parties appearing in all currently pending actions
18 involving Stephens Media content; (3) it has sent the United States District Court for the District of
19 Colorado materials required by the July 14th Order, which have additionally been filed electronically
20 by counsel for Leland Wolf in *Righthaven LLC v. Wolf*, Case No. 1:11-cv-00830-JLK; and (4) it has
21 sent copies of the Court’s dismissal for lack of standing, the SAA and the July 14, 2011 OSC hearing
22 transcript to all defendants that have been served in pending actions, but which have failed to appear
23 or against whom that default has been entered. Righthaven has electronically filed certificates of
24 service in all pending actions that reflect copies of the required materials have been provided to
25 counsel, *pro se* defendants, and to defending parties upon which service has been effectuated, but
26 that have failed to appear or otherwise respond to the operative complaint. A summary of
27 Righthaven’s compliance efforts is set forth in the table attached hereto as Exhibit “1”.
28

1 Righthaven has not provided copies of the Court's dismissal for lack of standing, the SAA
2 and the July 14, 2011 OSC hearing transcript to those parties that are named defendants in pending
3 actions, but for which service of process of the operative version of the complaint has not been
4 effectuated. Righthaven, however, has not deliberately failed to serve or failed to attempt to serve
5 any defendant in any pending action. Unfortunately, some named defendants have managed to
6 evade service of process or simply cannot be located so that service can be made upon them. Should
7 Righthaven effectuate service on any defendant in any pending action that it been able to effectuate
8 to date, it will provide those parties with copies of the SAA and the July 14, 2011 OSC hearing
9 transcript pursuant to the July 14th Order.

10
11 Dated this 8th day of August, 2011.

12 SHAWN A. MANGANO, LTD.

13 By: /s/ Shawn A. Mangano
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21 *Attorney for Righthaven LLC*
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1 **CERTIFICATE OF SERVICE**

2 Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that I on this 8th day of
3 August, 2011, I served the foregoing document via the Court's CM/ECF system.

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5 By: /s/ Shawn A. Mangano
6 SHAWN A. MANGANO, ESQ.
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