

2011 AUG 19 P 2:51

COURT CLERK
DISTRICT OF NEVADA

BY _____ DEPUTY

1 **Gregory Stocks**
2 **640-D North Calvert St.**
3 **Baltimore, Md. 21202**
4 **(410) 913-4337**

5 **UNITED STATES DISTRICT COURT**
6 **DISTRICT OF NEVADA**

7 **Righthaven LLC**

8 Plaintiff,

9 vs.

10 **Law Med Consulting LLC, The Law Med**
11 **Blog, and Gregory Stocks**

12 Defendants
13

Case No. 2:11-cv-00717-ECR -PAL

AFFIDAVIT FOR JUDICIAL NOTICE
OF FAILURE TO COMPLY WITH A
JUDICIAL ORDER

14
15 Gregory Stocks, Defendant pro per in the above entitled action, files this Affidavit to
16 inform the court of the Plaintiff's failure to comply with a judicial order, and the
17 misrepresentations by Righthaven of that failure to comply, which are such that they constitute a
18 Fraud Upon the Court. Righthaven's failure to comply has also unfairly prejudiced the
19 proceedings against the Defendants.

20 **Background For The Affidavit**

21 The instant action was filed on May 5, 2011, and the three Defendants have yet to be
22 served with the complaint. However, all of the named Defendants are in fact one in the same
23 'person', the Affiant, Gregory Stocks. At the time the complaint was filed, Summons were issued
24 for three defendants: Gregory Stocks, Law Med Consulting LLC, and The Law Med Blog. Each
25 summons contains the correct, public record address for each Defendant and that address is
26 identical for each: 640-D North Calvert St., Baltimore, MD, 21202. This is Affiant's personal
27 residence and one and only address listed in all state and internet records for the other two
28 entities.

1 In a separate action, **Righthaven v Democratic Underground Case 2:10-cv-01356-**
2 **RLH –GWF**, Judge Robert Hunt ordered Righthaven to produce certain documents to all parties
3 who are defendants in all current Righthaven lawsuits, *including* parties who have yet to be
4 served in cases that have been filed, and to do so by August 8, 2011. This date was an extension
5 from an original date of July 29, when instead of meeting the deadline for compliance,
6 Righthaven motioned the Court for a 10 day extension of time to comply citing confusion as to
7 the requirements of the Order and being too busy.

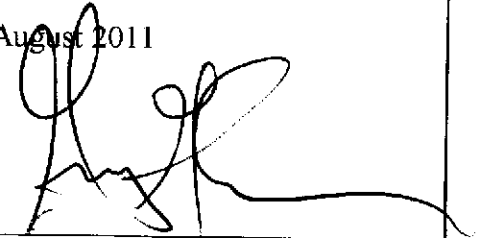
8 The truth of the matter is Righthaven has made absolutely no effort or attempt to comply
9 with Judge Hunt's Order as it pertains to the Defendants in this case. Righthaven has never
10 attempted to mail anything to the Defendants or addresses listed in the very Summons they had
11 issued in this case. Contrary to representations made to the Court by Righthaven, Righthaven has
12 never attempted to serve the Defendants in this case with a Summons. The addresses listed, by
13 Righthaven, on the Summons, are true and correct, with absolutely no impediment to daily
14 delivery of the US mail, Certified US Mail, United Parcel Service, FedEx, or any other common
15 document delivery agent.

16 In short, Righthaven has made intentional misrepresentations to the Court, which
17 arguably constitute a Fraud Upon the Court, and Righthaven has intentionally failed to comply
18 with the Court's Order specifically to prevent the named Defendants from receiving the
19 documents and material information contained therein as ordered by Judge Hunt. In fact Judge
20 Hunt was specific in his reasoning as to why Righthaven must provide the documents directly to
21 all parties: "The Court is fully aware of Righthaven's practice of filing suit against a party and
22 then entering settlement negotiations (and frequently settling) without ever serving the party. The
23 Court concludes that depriving those parties of the benefit of the Court's order would be unjust."
24 (Exhibit A)

25 In fact Righthaven has already been sanctioned by Judge Hunt for other "multiple"
26 misrepresentations they have made to the Court. This is yet another, now rather predictable,
27 underhanded attempt to get one over on the Court and the defendants in the 276 related lawsuits
28 they have filed.

1 This information is being provided to the Court in the form of an Affidavit for a number
2 of reasons. Affiant has yet to be served with the complaint in the above entitled action and is not
3 a party in *Righthaven v Democratic Underground*. Affiant is submitting this Affidavit to the
4 Clerk for filing in both cases. Should the Court wish for the information contained herein to be
5 submitted in a different format, the affiant will be happy to do so. Affiant has chosen this format
6 as it is unclear whether there is a more appropriate form for the Affiant to utilize in order to
7 notify the Court of the failure to comply with an order in a case where he is a nonparty but which
8 also applies to a case in which he is a party, but has not yet been served with the complaint.

9
10
11 Respectfully submitted this 16th day of August 2011



12
13
14
15 Gregory Stocks pro per
16 640-D North Calvert St.
17 Baltimore, MD 21202
18 (410) 913-4337
19 admin@lawmedconsultant.com
20
21
22
23
24
25
26
27
28

Affidavit Submitted For Judicial Notice

I, the undersigned, Gregory Stocks, hereafter "Affiant", having first-hand knowledge of the facts stated herein, and being competent in mind and body to testify, declare and affirm that the facts stated herein are true, correct, and complete in all material fact to the best of my knowledge, information and belief, and are not misrepresented.

Affiant is a defendant in one of the 'Righthaven lawsuits', *Righthaven v Law Med Consulting et al.* Case 2:11-cv-00717-ECR –PAL. The action was filed on May 5 and the three defendants have yet to be served. All of the defendants are in fact one in the same person, the Affiant. At the time the complaint was filed, Summons were issued for three defendants: Gregory Stocks, Law Med Consulting LLC, and The Law Med Blog. Each summons contains the correct, public record address for each defendant and that address is identical for each: 640-D North Calvert St., Baltimore, MD, 21202. This is my personal residence AND the address listed in all state and internet records for the other two entities. (Exhibit A)

In another Righthaven case, *Righthaven v Democratic Underground* Case 2:10-cv-01356-RLH –GWF, the Court sanctioned Righthaven for "intentional failure to disclose" a pecuniary interest, and ordered Righthaven to produce specific documents to all parties who are defendants in current Righthaven lawsuits, including parties who have yet to be served in cases that have been filed, by August 8, 2011. (Exhibit B) The Court stated "*As part of the sanction, the court is going to order that every case Righthaven has in any jurisdiction in this country must be provided with a copy of this Court's decision about the agreement, the one on standing, and the agreement be disclosed to parties that Righthaven has sued*". (Transcript, *Righthaven v Democratic Underground* Case 2:10-cv-01356-RLH –GWF July 14, 2011 hearing on sanctions, p.17)

On August 8, 2011, Righthaven filed with the Court in the *Democratic* case a Notice of Compliance in which Righthaven states:

"Righthaven has complied with the July 14th Order as follows: ... (2) it has sent copies of the Court's dismissal for lack of standing, the SAA [the "agreement"]

and the July 14, 2011 OSC hearing transcript to all addresses on file for all pro se parties appearing in all currently pending actions involving Stephens Media content". (Exhibit C p.2 ¶ 3)

This representation to the court by Righthaven was false and intentionally misleading. Affiant is one of the pro se parties Righthaven refers to. Along with the Notice of Compliance Righthaven filed a "July 14, 2011 Order Compliance Table" listing the parties in question and the address Righthaven alleges to have on file for each. Affiant can be found listed as item 71, with the following notation as the address represented as being on file for the Affiant: "No address. Unable to serve complaint to date". (Exhibit C p.6)

As previously noted, Righthaven in fact does have Affiant's correct address on file, and has already represented to the court that they have this address on file, as well as the addresses for all of the defendants in the cause of action against the Affiant, in the form of a May 6 Summons filed with the Clerk. (Exhibit A) Despite clearly being in possession of a correct address, Righthaven failed to comply with the Order to provide the documents and instead falsely represented to the Court that they had no known addresses on file, leading to an inability to comply, and further falsely represented that the service of the complaint could not take place due to a lack of address.

When one looks at all of the lawsuits filed in May (the most recent and also the last month Righthaven filed a batch of lawsuits, all of which were prior to the Court's unfavorable standing rulings) listed on Righthaven's "July 14, 2011 Order Compliance Table", one notes that they are items 73-81. Five of these list the same "No address. Unable to serve complaint to date". (Exhibit X pp. 6-7) All are pro-se cases. Yet all have Summons prepared by Righthaven in the docket with full addresses for each defendant and no record of a summons returned for lack of ability to effect service. (Exhibit D)

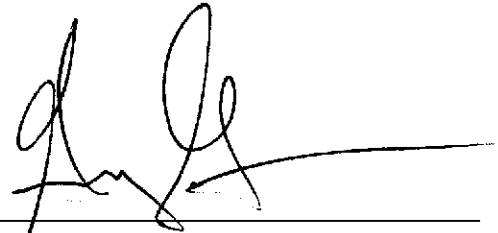
Affiant questions whether Righthaven has made any effort to comply with the Order of the Court in regard to the defendants in these other cases also. From the record it appears that Righthaven treated these defendants similar to those in Affiant's case.

To be clear: Righthaven has NEVER attempted to mail anything to the Defendants in *Righthaven v Law Med Consulting et al.* and/or the addresses clearly stated on their own

Affidavit of Gregory Stocks

Summons. Righthaven has NEVER attempted service of the complaint, despite stating "Unable to serve complaint to date".

Respectfully submitted this 16th day of August, 2011

A handwritten signature in black ink, appearing to read 'Gregory Stocks', written over a horizontal line.

Gregory Stocks
640-D N Calvert St.
Baltimore, MD 21202
(410) 913-4337
admin@lawmedconsultant.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATION OF MAILING

I hereby certify that on August 16, 2001 a true copy of this Affidavit For Judicial Notice, and all attachments was mailed via U.S. Regular Mail to the Clerk of the Court, U.S. District Court, District of Nevada, 400 S. Virginia Street, Reno, NV 89501, The Honorable Robert L. Hunt, U.S. District Court, District of Nevada, 333 South Las Vegas Blvd., Las Vegas, NV 89101, Shawn A. Mangano, 9960 West Cheyenne Avenue, Suite 170, Las Vegas, Nevada 89129-7701, and via electronic mail to Laurence F. Pulgram lpulgram@fenwick.com, Clifford C. Webb cwebb@fenwick.com Jennifer J. Johnson jjjohnson@fenwick.com Kurt Opsahl kurt@eff.org Corynne McSherry corynne@eff.org and Chad Bowers bowers@lawyer.com



Gregory Stocks pro per
640-D North Calvert St.
Baltimore, MD 21202
(410) 913-4337
admin@lawmedconsultant.com

EXHIBIT A: Summons in Righthaven v
Law Med Consulting, et al.

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Nevada

**RIGHTHAVEN LLC, a Nevada limited-liability
company**

Plaintiff

v.

**LAW MED CONSULTING LLC, a Maryland
limited-liability company et al.**

Defendant

Civil Action No. 2:11-cv-00717

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* **LAW MED BLOG
c/o Greg Stocks
640-D North Calvert Street
Baltimore, MD 21202**

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

**Shawn A. Mangano, Esq.
Shawn A. Mangano, Ltd.
9960 West Cheyenne Avenue, Suite 170
Las Vegas, Nevada 89129
United States of America**

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the
District of Nevada

RIGHTHAVEN LLC, a Nevada limited-liability
company

Plaintiff

v.

LAW MED CONSULTING LLC, a Maryland
limited-liability company et al.

Defendant

Civil Action No. 2:11-cv-00717

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) LAW MED CONSULTING LLC
c/o Greg Stocks
640-D North Calvert Street
Baltimore, MD 21202

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you
are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ.
P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of
the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney,
whose name and address are:

Shawn A. Mangano, Esq.
Shawn A. Mangano, Ltd.
9960 West Cheyenne Avenue, Suite 170
Las Vegas, Nevada 89129
United States of America

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint.
You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Nevada

RIGHTHAVEN LLC, a Nevada limited-liability company

Plaintiff

v.

LAW MED CONSULTING LLC, a Maryland limited-liability company et al.

Defendant

Civil Action No. 2:11-cv-00717

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Greg Stocks
640-D North Calvert Street
Baltimore, MD 21202

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Shawn A. Mangano, Esq.
Shawn A. Mangano, Ltd.
9960 West Cheyenne Avenue, Suite 170
Las Vegas, Nevada 89129
United States of America

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

EXHIBIT B: Order in Righthaven v Democratic Underground

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

* * *

RIGHTHAVEN LLC, a Nevada limited-liability
company,

Plaintiff,

vs.

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,

vs.

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

Counterdefendants.

Case No.: 2:10-cv-001356-RLH-GWF

ORDER

(Motion for Extension of Time,
and Clarification #143)

1 Before the Court is Righthaven's **Motion for Extension, Clarification, and Stay**
2 (#143, filed July 29, 2011). The Court has also considered Democratic Underground's Opposition
3 (#145, filed Aug. 1, 2011).

4 Righthaven's counsel filed this motion in the afternoon of July 29, the day by which
5 Righthaven was ordered to comply with the Court's sanctions. That same day, the Court granted a
6 ten day extension through Monday, August 8, for Righthaven to comply with the Court's sanction.
7 The Court deferred ruling on the remaining issues due to the lateness of Righthaven's filing.

8 In this motion, Righthaven requests that the Court clarify its sanctions order and
9 extend the time for Righthaven to comply with the sanctions. The Court has already granted an
10 extension and will now address the requested clarifications. Righthaven desires to know: (1)
11 whether simply filing the required documents in a case where the defendant has not yet been
12 served would be sufficient, and (2) whether cases that have been dismissed but appealed constitute
13 pending actions. Although the Court does not believe that clarification is necessary, the Court will
14 clarify these and a few other issues.

15 First, as Righthaven points out in its motion, when the Court issued the sanctions
16 the Court and counsel referred to "parties," not merely cases. Accordingly, it is insufficient to
17 merely file the required documents; Righthaven must produce the documents to the *parties* in
18 those cases as the Court clearly stated. The reason for this is simple: the Court is fully aware of
19 Righthaven's practice of filing suit against a party and then entering settlement negotiations (and
20 frequently settling) without ever serving the party. The Court concludes that depriving those
21 parties of the benefit of the Court's order would be unjust.

22 Second, Righthaven must produce the required documents to all parties in all
23 pending matters. The Court stated that the order would "not apply to those cases that have been
24 dismissed *unless there's going to be an appeal in those cases.*" (Dkt. #.) The Court clearly
25 ordered that Righthaven produce these documents in cases that have been dismissed but are later
26 appealed. This logically includes cases that have already been appealed. Further, if there are any

1 pending motions in a case, that case is still pending in some fashion. Accordingly, Righthaven
2 must produce the required documents in those cases as well even if all that remains pending is a
3 request for attorney's fees or some similar matter.

4 Finally, after reexamining the issues and counsel's stated difficulties, the Court
5 concludes that it was overly generous in granting the extension because counsel's situation is
6 largely—if not entirely—of his and Righthaven's own making. Righthaven and its counsel should
7 concentrate their efforts on material issues and court orders, not wishful research. Further, if
8 counsel does not have time to do all that he needs to in Righthaven's dozens of cases, the Court
9 kindly suggests that he or Righthaven obtain additional help, not complain to the Court about time
10 constraints. Righthaven also informed the Court in its motion that it plans to request a stay of the
11 monetary sanction. The Court already granted an extension, which it will not change, and suggests
12 Righthaven not waste its time on a motion requesting any further relief from the sanction.

13 **CONCLUSION**

14 Accordingly, and for good cause appearing,

15 IT IS HEREBY ORDERED that Righthaven's Motion for Extension of Time and
16 Clarification (#143) is GRANTED as detailed above.

17 Dated: August 2, 2011.

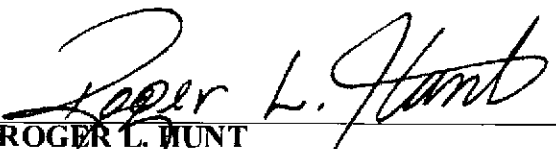
18
19 
20 **ROGER L. HUNT**
21 **United States District Judge**

EXHIBIT C: Righthaven Notice of Compliance

1 SHAWN A. MANGANO, ESQ.
Nevada Bar No. 6730
2 shawn@manganolaw.com
SHAWN A. MANGANO, LTD.
3 9960 West Cheyenne Avenue, Suite 170
Las Vegas, Nevada 89129-7701
4 Tel: (702) 304-0432
Fax: (702) 922-3851
5

6 *Attorney for Righthaven LLC*
7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**
10

11 RIGHTHAVEN LLC, a Nevada limited-liability
12 company,

Plaintiff,

13 v.

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

16 Defendants.
17

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

20 v.

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

23 Counterdefendants.
24
25
26
27
28

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

14 SHAWN A. MANGANO, ESQ.

15 Nevada Bar No. 6730

16 shawn@manganolaw.com

17 9960 West Cheyenne Avenue, Suite 170

18 Las Vegas, Nevada 89129-7701

19 Tel: (702) 304-0432

20 Fax: (702) 922-3851

21 *Attorney for Righthaven LLC*

22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

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

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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

RIGHTHAVEN LLC V. DEMOCRATIC UNDERGROUND, LLC

July 14, 2011 Order Compliance Table

Exhibit "1" to Notice of Compliance

	CASE NAME	CASE NO.	PARTY/ADDRESS SERVED
1.	Ecological Internet	10-00691	Ecological Internet, Inc. c/o Dr. Glenn Barry N991 Manitowoc Road Denmark, WI 54208
2.	Goff Associates	10-00742	Goff Associates No address Unable to serve complaint to date Patrick Goff No address Unable to serve complaint to date
3.	Ozean Group	10-00798	Ozean Group c/o The UPS Store 1300 King Street East Oshawa, Ontario Canada Thomas Wahl Terminated
4.	Futrell	10-00813	Ron Futrell c/o Jason Wilcy, Esq. jwiley@woodserickson.com
5.	Smith	10-01031	Brien Smith 2114 Del Pero Street Marysville, CA 95901 Fullthrottletv.net c/o Brien Smith 2114 Del Pero Street Marysville, CA 95901
6.	Vannix Communications	10-01035	Vannix Communications Group, Inc. c/o Abby Nixon 3930 Swenson Street, Apt. 808 Las Vegas, NV 89119 Abby Nixon 3930 Swenson Street, Apt. 808 Las Vegas, NV 89119 Abby Nixon 640 McNight Street Las Vegas, NV 89101

RIGHTHAVEN LLC V. DEMOCRATIC UNDERGROUND, LLC

July 14, 2011 Order Compliance Table

Exhibit "1" to Notice of Compliance

72.	Loosle	11-00627	Tony Carl Loosle 1772 N. 600 W. Logan, Utah 84321 TCS, Inc. c/o Tony Carl Loosle 1772 N. 600 W. Logan, Utah 84321
73.	Smith	11-00716	Jane Smith No address Unable to serve complaint to date Subliminalselfhypnosis.com No address Unable to serve complaint to date
74.	Law Med Consulting	11-00717	Greg Stocks No address Unable to serve complaint to date Law Med Blog No address Unable to serve complaint to date Law Med Consulting LLC No address Unable to serve complaint to date
75.	Extreme DUI	11-00718	Johannes Garrido 755 Watson Canyon Court, # 234 San Ramon, CA 94582 Extreme DUI c/o Johannes Garrido 755 Watson Canyon Court, # 234 San Ramon, CA 94582

RIGHTHAVEN LLC V. DEMOCRATIC UNDERGROUND, LLC

July 14, 2011 Order Compliance Table

Exhibit "1" to Notice of Compliance

76.	Gunner's Alley	11-00719	Gunner's Alley LLC c/o Gary Beaver, Esq. gbeaver@nexsenpruet.com No formal appearance made to date Affordable Hunting Trips c/o Gary Beaver, Esq. gbeaver@nexsenpruet.com Bradford Justus c/o Gary Beaver, Esq. gbeaver@nexsenpruet.com
77.	Newsblaze	11-00720	Newsblaze LLC Alan Gray c/o James M. DeVoy, Esq. jmd@randazza.com Mark Randazza, Esq. mjr@randazza.com
78.	Computer Services One	11-00721	Norman Edwards 919 18 th Street South St. Petersburg, FL 33712 Computer Services One LLC c/o Norman Edwards 919 18 th Street South St. Petersburg, FL 33712
79.	Kirk	11-00722	John Kirk No address Unable to serve complaint to date
80.	Brommell	11-00724	Neil Brommell No address Unable to serve complaint to date Holly L. Brewer No address Unable to serve complaint to date
81.	Sieber	11-00729	No address Unable to serve complaint to date
82.	Mostofi	11-01160	Dean Mostofi 1737 Glastonberry Road Potomac, MD 20854

EXHIBIT D: Summons in Righthaven Cases

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Nevada

RIGHTHAVEN LLC, a Nevada limited-liability company,

Plaintiff

v.

NEIL G. BROMMELL, an individual; and HOLLY L. BREWER, an individual,

Defendant

Civil Action No. 2:11-cv-00724-RLH -RJJ

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Neil G. Brommell 376 Queen Elizabeth Place Ottawa, ON K1S 3N3

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Shawn A. Mangano, Esq. Shawn A. Mangano, Ltd. 9960 West Cheyenne Avenue, Suite 170 Las Vegas, Nevada 89129 United States of America

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

LANCE S. WILSON

CLERK

Lance S. Wilson

(By) DEPUTY CLERK



May 6, 2011

DATE

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Nevada

RIGHTHAVEN LLC, a Nevada limited-liability company,

Plaintiff

v.

NEIL G. BROMMELL, an individual; and
HOLLY L. BREWER, an individual,

Defendant

Civil Action No. 2:11-cv-00724-RLH -RJJ

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Holly L. Brewer
927 Brass Ring Road
Las Vegas, NV 89123

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Shawn A. Mangano, Esq.
Shawn A. Mangano, Ltd.
9960 West Cheyenne Avenue, Suite 170
Las Vegas, Nevada 89129
United States of America

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

LANCE S. WILSON

CLERK

Lance S. Wilson

(By) DEPUTY CLERK



May 6, 2011

DATE

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Nevada

RIGHTHAVEN LLC, a Nevada limited-liability company

Plaintiff

v.

JANE SMITH, an individual, et al.

Defendant

Civil Action No. 2:11-cv-00716 RLH-PAL

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Jane Smith
5107 Hutchinson Road
Sebastopol, CA 95472

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Shawn A. Mangano, Esq.
Shawn A. Mangano, Ltd.
9960 West Cheyenne Avenue, Suite 170
Las Vegas, Nevada 89129
United States of America

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

LANCE S. WILSON

CLERK

Lance S. Wilson

(By) DEPUTY CLERK



May 6, 2011 Las Vegas NV

DATE

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Nevada

RIGHTHAVEN LLC, a Nevada limited-liability company
Plaintiff
v.
JANE SMITH, an individual, et al.
Defendant

Civil Action No. 2:11-cv-00716 RLH-PAL

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) SUBLIMINALSELFHYPNOSIS.COM
c/o Jane Smith
5107 Hutchinson Road
Sebastopol, CA 95472

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Shawn A. Mangano, Esq. Shawn A. Mangano, Ltd. 9960 West Cheyenne Avenue, Suite 170 Las Vegas, Nevada 89129 United States of America

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

LANCE S. WILSON

CLERK

Lance S. Wilson

(By) DEPUTY CLERK



May 6, 2011 Las Vegas NV

DATE

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Nevada

RIGHTHAVEN LLC, a Nevada limited-liability company,

Plaintiff

v.

JOHN KIRK, an individual,

Defendant

Civil Action No. 2:11-cv-00722

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) John Kirk
110 Baxter Avenue
San Antonio, TX 78220-1011

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Shawn A. Mangano, Esq.
Shawn A. Mangano, Ltd.
9960 West Cheyenne Avenue, Suite 170
Las Vegas, Nevada 89129
United States of America

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

LANCE S. WILSON

CLERK

Lance S. Wilson

(By) DEPUTY CLERK



5/6/11

DATE

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Nevada

RIGHTHAVEN LLC, a Nevada limited-liability company,

Plaintiff

v.

BOB SIEBER, an individual

Defendant

Civil Action No. 2:11-cv-00729

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Bob Sieber
RT 2 Box 257-20
Nowata, OK 74048-9673

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Shawn A. Mangano, Esq.
Shawn A. Mangano, Ltd.
9960 West Cheyenne Avenue, Suite 170
Las Vegas, Nevada 89129
United States of America

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

LANCE S. WILSON

CLERK

Lance S. Wilson

(By) DEPUTY CLERK



5/9/11

DATE