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 14 UNDERGROUND, LLC, and Defendant DAVID ALLEN

**UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF NEVADA**

16 RIGHTHAVEN LLC, a Nevada limited liability)
 17 company,)
)
 18 Plaintiff,)
)
 19 v.)
 19 DEMOCRATIC UNDERGROUND, LLC, a)
 District of Columbia limited-liability company;)
 20 and DAVID ALLEN, an individual,)
)
 21 Defendants.)
 _____)
 22 DEMOCRATIC UNDERGROUND, LLC, a)
 District of Columbia limited-liability company,)
 23 Counterclaimant,)
)
 24 v.)
 25 RIGHTHAVEN LLC, a Nevada limited liability)
 company, and STEPHENS MEDIA LLC, a)
 26 Nevada limited-liability company,)
)
 27 Counterdefendants.)
 _____)

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

**JOINT STIPULATION AND
 [PROPOSED] ORDER TO EXTEND
 TIME TO RESPOND AND REPLY
 TO MOTIONS TO DISMISS
 (FIRST REQUEST)**

28 JOINT STIPULATION TO EXTEND TIME
 TO RESPOND TO PLAINTIFF AND
 COUNTERDEFENDANTS' MTNS TO
 DISMISS

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

1 IT IS HERBY STIPULATED BETWEEN Defendants and Counterclaimant, Democratic
2 Underground and David Allen (collectively "Defendants"), though their attorneys of record, and
3 Plaintiff and Counterdefendant, Righthaven LLC, and Counterdefendant Stephens Media LLC,
4 though their attorneys of record, as follows:

- 5 1. At the Counterdefendants' request, the parties previously stipulated to extend
6 Counterdefendants' deadline to respond to the counterclaim for 30 days, until
7 November 17, 2010. *See* Docket No. 29.
- 8 2. On November 15, 2010, Counterdefendant Righthaven LLC responded by filing a
9 motion to voluntarily dismiss its Complaint in this action and to dismiss the
10 Counterclaim. *See* Docket No. 36. Defendants' response to this motion is
11 currently due on December 2, 2010 pursuant to Local Rules.
- 12 3. On November 17, 2010, Counterdefendant Stephens Media LLC responded by
13 filing a motion to dismiss or strike the Counterclaim and a joinder to
14 Counterdefendant Righthaven LLC's motion to voluntarily dismiss. *See* Docket
15 Nos. 38 & 39. Defendants' responses to these motions are currently due on
16 December 6, 2010 pursuant to Local Rules.
- 17 4. The parties agree that it will benefit efficiency in disposition of this action and
18 reduce any unnecessary burden on this Court for Defendants' responses to these
19 motions to be filed at the same time. Accordingly, the parties have agreed to
20 extend Defendants' deadline to respond to Righthaven LLC's and Stephens Media
21 LLC's motions, Docket numbers 36, 38 and 39, until December 7, 2010.
- 22 5. In light of this extension of Defendants' time to respond, Counterdefendants have
23 requested and the parties have further agreed that Plaintiff's and
24 Counterdefendants' time to file a reply in support of their respective motions
25 should likewise be extended to December 21, 2010.

26 This is the first request for such an extension. This stipulated extension is sought in good
27 faith and not for the purposes of delay.

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Dated this 23rd day of November, 2010

FENWICK & WEST LLP

RIGHTHAVEN LLC

By: /s/ Laurence Pulgram
LAURENCE PULGRAM, ESQ

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

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STEPHENS MEDIA LLC

IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE

DATED: _____

