

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 (702) 304-0432 – telephone
 (702) 922-3851 – facsimile

5
 6 J. CHARLES COONS, ESQ.
 Nevada Bar No. 10553
ccoons@righthaven.com
 7 *Assistant General Counsel at Righthaven*
 Righthaven LLC
 8 9960 West Cheyenne Avenue, Suite 210
 Las Vegas, Nevada 89129-7701
 9 (702) 527-5900

10 *Attorneys for Plaintiff/Counterdefendant Righthaven LLC*

11
 12 **UNITED STATES DISTRICT COURT**
 13 **DISTRICT OF NEVADA**
 14

15 RIGHTHAVEN LLC, a Nevada limited-
 16 liability company,
 17
 18 Plaintiff,
 19 v.
 20 DEMOCRATIC UNDERGROUND, LLC, a
 District of Columbia limited-liability
 21 company; and DAVID ALLEN, an individual,
 22
 23 Defendants.

24 DEMOCRATIC UNDERGROUND, LLC, a
 District of Columbia limited-liability
 25 company,
 26
 27 Counterclaimant,
 28 v.

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

**DECLARATION OF SHAWN A.
 MANGANO IN SUPPORT OF REPLY IN
 SUPPORT OF RIGHTHAVEN LLC’S
 OPPOSITION TO DEFENDANTS’
 CROSS-MOTION FOR SUMMARY
 JUDGMENT**

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

4 Counterdefendants.
5

6 I, Shawn A. Mangano, declare, under penalty of perjury, that the following is true and
7 correct:

8 1. I am an attorney-at-law admitted to practice before all courts of the State of
9 Nevada. I have personal knowledge of the facts set forth below, except for those factual
10 statements expressly made upon information and belief, and as to those facts, I believe them to
11 be true. I am over eighteen years old and I am competent to testify to the matters set forth
12 herein.

13 2. I represent Plaintiff/Counterdefendant Righthaven LLC (“Righthaven”) in the
14 above-referenced matter.

15 3. This declaration is made in support of Righthaven, LLC’s Opposition to
16 Defendants’ Cross-Motion for Summary Judgment.

17 4. On or about December 15, 2010, Righthaven received Defendant Democratic
18 Underground, LLC (“Democratic Underground”) and Defendant David Allen’s (collectively
19 with Democratic Underground known herein as the “Defendants”) Rule 26 Initial Disclosures. A
20 true and correct copy of Defendants’ initial disclosures are attached hereto as Exhibit “1”. These
21 initial disclosures do not list all purported employees of Democratic Underground.

22 5. On or about December 17, 2010, Righthaven received Democratic Underground’s
23 First Set of Interrogatories.

24 6. On or about December 17, 2010, Righthaven received Democratic Underground’s
25 First Set of Requests for Admission.

26 7. On or about December 17, 2010, Righthaven received Democratic Underground’s
27 First Set of Requests for Production of Documents.
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CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that I attempted to electronically file the foregoing document and related exhibits on the seventh day of January, 2011. However, due to Internet-related transmission issues and PDF conversion complications to the accompanying exhibits due to my firm's conversion to a an Apple-based computer system, my attempts to formally file this foregoing document and related exhibits could not be accomplished until January 10, 2011, which was done via the Court's CM/ECF system.

By: /s/ Shawn A. Mangano

Shawn A. Mangano, Esq.
SHAWN A. MANGANO, LTD.
9960 West Cheyenne Avenue, Suite 170
Las Vegas, Nevada 89129-7701