

EXHIBIT B

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12 *Attorneys for Plaintiff Righthaven LLC*

13
14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 RIGHTHAVEN LLC, a Nevada limited-
17 liability company,

18
19 Plaintiff,

20 v.

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

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

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

(First Set)

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

3 Counterclaimant,

4 v.

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

8 Counterdefendants.
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10 Righthaven LLC (“Righthaven”) makes the following supplemental disclosures pursuant
11 to Rule 26(a)(1)(A) of the Federal Rules of Civil Procedure.

12
13 **I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION THAT**
14 **RIGHTHAVEN MAY USE TO SUPPORT ITS CLAIMS OR DEFENSES**

15 A. Brian Leitner
16 Systems Administrator
17 Democratic Underground, LLC (“Democratic Underground”).
18 c/o Fenwick & West LLP
19 555 California Street, 12th Floor
20 San Francisco, California 94104

21 Mr. Leitner possesses or may possess information relating to the following topics: (1)
22 operation of the website <democraticunderground.com> (“Website”); and (2) the existence of
23 the Website online forums, the posting, storage, and display, on the Website, of the unauthorized
24 reproduction of the literary work that is the subject of the instant suit.

25 B. Kurt Opsahl, Esq.
26 ELECTRONIC FRONTIER FOUNDATION
27 c/o Fenwick & West LLP
28 555 California Street, 12th Floor
San Francisco, California 94104

Mr. Opsahl possesses or may possess information relating to the following topics: (1)
the engagement of outside counsel for the specific purpose of increasing litigation fees in cases

1 involving Righthaven; (2) Electronic Frontier Foundation’s (“EFF”) prosecution of claims
2 against Stephens Media LLC despite their lack of merit; (3) EFF’s attempts to interject the
3 organization into other Righthaven cases in which it was unable to secure a role as counsel; and
4 (4) EFF’s attempts to unnecessarily and without justification bring Stephens Media, LLC in this
5 action for self-promotion and publicity purposes.

6 Righthaven reserves the right to supplement the foregoing disclosures as discovery
7 continues.

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9 **II. DESCRIPTION BY CATEGORY AND LOCATION OF DOCUMENTS,**
10 **ELECTRONICALLY STORED INFORMATION, AND TANGIBLE THINGS IN**
11 **RIGHTHAVEN’S POSSESSION, CUSTODY, OR CONTROL THAT**
12 **RIGHTHAVEN MAY USE TO SUPPORT RIGHTHAVEN’S CLAIMS**

13 The documents, electronically stored information, and tangible things located at
14 Righthaven, 9960 West Cheyenne Avenue, Las Vegas, Nevada 89129 that are in Righthaven’s
15 possession, custody, and control are supplemented to include all materials attached as exhibits to
16 the Complaint and all other motions, oppositions and/or replies thereto, which are publicly
17 available through the Court’s electronic filing system.

18 Righthaven reserves the right to supplement the foregoing disclosures as discovery
19 continues and at such time as an acceptable stipulated or non-stipulated protective order has been
20 entered by the Court.
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Dated this 17th day of December, 2010.

SHAWN A. MANGANO, LTD.

By: /s/ Shawn A. Mangano
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Attorneys for Plaintiff/ Counter-defendant

CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that on this 17th day of December, 2010, I caused the **PLAINTIFF’S SUPPLEMENTAL DISCLOSURES, PURSUANT TO RULE 26(a)(1)(A) OF THE FEDERAL RULES OF CIVIL PROCEDURE** to be served via electronic mail, and regular U.S. mail to the following address:

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Attorneys for Defendant/ Counterclaimant

By: /s/ Carlyn Dilger
An Employee of Righthaven