

# EXHIBIT C

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Attorneys for Counterdefendant  
Stephens Media, 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.

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

**COUNTERDEFENDANT STEPHENS  
MEDIA, LLC'S RESPONSES TO  
DEFENDANT AND  
COUNTERCLAIMANT DEMOCRATIC  
UNDERGROUND, LLC'S FIRST SET OF  
ADMISSIONS**

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.



1 applicable timeframe.

2 Without waiving the foregoing objections, Stephens Media, after reviewing its records,  
3 cannot identify a single Page View of the Web Page containing the News Article that was  
4 directed from the DU website and, therefore, denies the Request. *See also*, Response to  
5 Interrogatory No. 2, served concurrently herewith.  
6

7 **REQUEST FOR ADMISSION NO. 42:**

8 Admit that persons who clicked on the link on the EXCERPT page were directed from the  
9 DU WEBSITE to the LVRJ website.

10 **RESPONSE NO. 42:**

11 *See* Response to Request for Admission No. 41.

12 **REQUEST FOR ADMISSION NO. 43:**

13 Admit that the link on the EXCERPT page generated traffic and page views for the LVRJ  
14 WEBSITE.

15 **RESPONSE NO. 43:**

16 *See* Response to Request for Admission No. 41.

17 **REQUEST FOR ADMISSION NO. 44:**

18 Admit that Righthaven does not charge the LVRJ for LVRJ's use of the NEWS ARTICLE  
19 on the LVRJ WEB SITE.  
20

21 **RESPONSE NO. 44:**

22 Objection. The foregoing Request seeks confidential business and/or commercially  
23 sensitive information. Without waiving the foregoing objection, Stephens Media admits the  
24 Request.  
25

26 **REQUEST FOR ADMISSION NO. 45:**

27 Admit that Stephens Media earns no fees through licensing of the NEWS ARTICLE.  
28



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**REQUEST FOR ADMISSION NO. 75:**

Admit that it would be impracticable for Stephens Media to review before posting all materials posted to the LVRJ WEBSITE by third parties.

**RESPONSE NO. 75:**

Objection. This Request is vague and ambiguous as to the term "impracticable." Stephens Media admits the Request to the extent that such a review may be cost-prohibitive or unnecessary. Stephens Media denies the remainder of this Request to the extent it is inconsistent with the foregoing Response.

DATED this 18th day of January, 2011.

CAMPBELL & WILLIAMS

By 

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