1	LAURENCE F. PULGRAM (CA State Bar No. 115163) (pro	o hac vice)
2	lpulgram@fenwick.com CLIFFORD C. WEBB (CA State Bar No. 260885) (pro hac	vice)
3	cwebb@fenwick.com FENWICK & WEST LLP	
4	555 California Street, 12th Floor San Francisco, California 94104	
5	Telephone: (415) 875-2300 Facsimile: (415) 281-1350	
6	KURT OPSAHL (CA State Bar No. 191303) (pro hac vice)	
7	kurt@eff.org CORYNNE MCSHERRY (CA State Bar No. 221504) (pro h	nac vice)
8	corynne@eff.org ELECTRONIC FRONTIER FOUNDATION	
9	454 Shotwell Street San Francisco, California 94110	
10	Telephone: (415) 436-9333 Facsimile: (415) 436-9993	
11	CHAD BOWERS (NV State Bar No. 7283)	
12	bowers@lawyer.com CHAD A. BOWERS, LTD	
13	3202 West Charleston Boulevard Las Vegas, Nevada 89102 Telephone: (702) 457-1001	
14	Attorneys for Defendant and Counterclaimant	
15	DEMOCRATIC UNDERGROUND, LLC, and Defendant DAVID ALLEN	
16	UNITED STATES DISTRICT FOR THE DISTRICT OF N	
17	FOR THE DISTRICT OF NE	LVADA
18	RIGHTHAVEN LLC, a Nevada limited liability company,	Case No. 10-01356-RLH (GWF)
19	Plaintiff, v.	IDD ODOGEDI ODDED
20	DEMOCRATIC UNDERGROUND, LLC, a District of	[PROPOSED] ORDER GRANTING REQUEST TO
21	Columbia limited-liability company; and DAVID ALLEN, an individual,	UNSEAL EXHIBIT A TO PULGRAM DECLARATION AND RELATED FILINGS
22	Defendants.	[DKT NOS. 74, 79]
23	DEMOCRATIC UNDERGROUND, LLC, a District of	
24	Columbia limited-liability company, Counterclaimant,	
25	V.	
26	RIGHTHAVEN LLC, a Nevada limited liability company,	
27	and STEPHENS MEDIA LLC, a Nevada limited-liability company,	
28	Counterdefendants.	
	[PROPOSED] ORDER GRANTING REQUEST TO UNSEAL	CASE NO. 2:10-CV-01356-RLH (GWF)

1	On March 8, 2011, this Court granted Defendants' Conditional Motion to File Documents		
2	Under Seal (Dkt. 75) and ordered that, "within fourteen (14) days of the date of this Order, (i) the		
3	parties shall file a stipulation as to which portions of said Exhibit A and the Supplemental		
4	Memorandum shall remain under seal or, (ii) if no stipulation is reached by the parties,		
5	Counterdefendants Stephens Media, LLC and Righthaven, LLC shall file with the Court their		
6	justification for retaining Exhibit A under seal." As no such stipulation was reached and filed		
7	within the time provided by the Order, and no justification was filed by either Counterdefendants		
8	Stephens Media, LLC or Righthaven, LLC,		
9	IT IS HEREBY ORDERED:		
10	That Defendants' Motion for Leave to File Supplemental Memorandum Addressing		
11	Recently Produced Evidence Relevant to Pending Motions (Dkt. 74); (ii) Defendants'		
12	Supplemental Memorandum Addressing Recently Produced Evidence Relevant To Pending		
13	Motions (Dkts. 74 & 79); (iii) Declaration of Laurence Pulgram (Dkts. 74 & 79); and (iv) Exhibit		
14	A to Declaration of Laurence Pulgram (Dkts. 74 & 79) are hereby unsealed and shall be made		
15	publicly available on this Court's docket.		
16			
17	Dated:		
18	The Honorable ROGER L. HUNT United States District Judge		
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			
	[PROPOSED] ORDER GRANTING REQUEST TO UNSEAL CASE NO. 2:10-cv-01356-RLH (GWF)		