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 15 DEMOCRATIC UNDERGROUND, LLC, and  
 Defendant DAVID ALLEN

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

18 RIGHTHAVEN LLC, a Nevada limited liability company,  
 19 Plaintiff,

v.

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

22 Defendants.

23 DEMOCRATIC UNDERGROUND, LLC, a District of  
 24 Columbia limited-liability company,

Counterclaimant,

v.

26 RIGHTHAVEN LLC, a Nevada limited liability company,  
 27 and STEPHENS MEDIA LLC, a Nevada limited-liability  
 company,

28 Counterdefendants.

Case No. 10-01356-RLH (GWF)

**DECLARATION OF  
 CLIFFORD C. WEBB  
 IN SUPPORT OF  
 DEFENDANTS' REQUEST  
 TO UNSEAL EXHIBIT A TO  
 PULGRAM DECLARATION  
 AND RELATED FILINGS  
 [DKT NOS. 74, 79]**

1 I, Clifford C. Webb, declare as follows:

2 1. I am an attorney licensed to practice law in the state of California and an associate  
3 at Fenwick & West, LLP, counsel for Defendant/Cross-Complainant Democratic Underground,  
4 LLC and Defendant David Allen (hereinafter “Defendants”) in this matter. I have personal  
5 knowledge of the facts stated in this declaration, and if called upon to do so, could and would  
6 competently testify thereto.

7 2. On March 3, 2011, counsel for Defendants first requested by e-mail that Stephens  
8 Media and Righthaven agree to lift the “Confidential Attorneys’ Eyes Only” designation on  
9 Exhibit A to the Pulgram Declaration, or to provide specific portions of that document for which  
10 the designation could be lifted. By March 9, 2011, neither Stephens Media nor Righthaven  
11 responded to that request.

12 3. On March 9, 2011, following this Court’s March 8 Order, counsel for Defendants  
13 again requested by e-mail that Stephens Media and Righthaven agree to lift the designation on  
14 Exhibit A and noted Defendants’ willingness to attempt to stipulate to redaction of any  
15 appropriately limited portion identified by Stephens Media and Righthaven.

16 4. That same day, March 9<sup>th</sup>, counsel for Stephens Media and Righthaven refused to  
17 lift the designation on Exhibit A. Since then, neither Righthaven nor Stephens Media have  
18 proposed redactions or sought a stipulated resolution from Defendants.

19 I declare under penalty of perjury under the laws of the United States that the foregoing is  
20 true and correct. Executed on March 29, 2011, in San Francisco, California.

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23 Dated: March 29, 2011

*/s/ Clifford C. Webb*

CLIFFORD C. WEBB

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