

EXHIBIT C

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21 DEMOCRATIC UNDERGROUND, LLC, and
22 Defendant DAVID ALLEN

23 **UNITED STATES DISTRICT COURT**
24 **FOR THE DISTRICT OF NEVADA**

25 RIGHTHAVEN LLC, a Nevada limited liability company,
26 Plaintiff,

27 v.

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

Defendants.

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.

Case No. 10-cv-01356-RLH (RJJ)

**DEFENDANT AND
COUNTERCLAIMANT
DEMOCRATIC
UNDERGROUND LLC'S
FIRST SET OF REQUESTS
FOR PRODUCTION OF
DOCUMENTS TO
COUNTERDEFENDANT
STEPHENS MEDIA LLC**

1 PROPOUNDING PARTIES: Defendant and Counterclaimant DEMOCRATIC
UNDERGROUND, LLC

2 RESPONDING PARTY: Plaintiff Stephens Media LLC

3 SET NUMBER: One (Nos. 1-69)

4
5 Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendant and
6 Counterclaimant DEMOCRATIC UNDERGROUND, LLC (“Democratic Underground”)
7 requests that Counterdefendant Stephens Media LLC (“Stephens Media”) respond hereto in
8 writing and produce and permit inspection and copying of each of the following documents and
9 tangible things. Democratic Underground requests that the documents and things be produced
10 within thirty (30) days of service hereof to the offices of Fenwick & West LLP.

11 DEFINITIONS

12 The following definitions and instructions apply to each request:

13 1. “DU” or “Democratic Underground” means Defendant and Counterclaimant
14 Democratic Underground, LLC, and any present or former officers, directors, employees, agents,
15 representatives, attorneys, or all other PERSONS acting, or purporting to act, on its behalf.

16 2. “Righthaven” means Plaintiff and Counterdefendant Righthaven LLC, its parents,
17 subsidiaries, divisions, and affiliates, including, any present or former officers, directors, trustees,
18 employees, agents, representatives, attorneys, or ALL other PERSONS acting, or purporting to
19 act, on its behalf.

20 3. “Defendants” means, collectively, Democratic Underground and Defendant David
21 Allen.

22 4. “Stephens Media” means Counterdefendant Stephens Media LLC, its parents ,
23 subsidiaries, divisions, affiliates, and predecessors, including, any present or former officers,
24 directors, trustees, employees, agents, representatives, attorneys, or all other PERSONS acting, or
25 purporting to act, on its behalf, and specifically including the *Las Vegas Review-Journal*, and the
26 Arkansas investment banker Warren Stephens’ family.

27 5. “YOU” or “YOUR” refers to Stephens Media and any agent, representative,
28 attorney, or other PERSON, business, advisor, or legal entity acting, or purporting to act, on its

1 behalf.

2 6. "Steven Gibson" means the Las Vegas attorney Steven A. Gibson and Steven A.
3 Gibson, Chartered (a Nevada professional corporation).

4 7. "PERSON(S)" includes, without limitation, individuals, corporations,
5 partnerships, limited partnerships, unincorporated associations, and ALL other governmental and
6 nongovernmental entities.

7 8. "COMMUNICATION(S)" means any transmission or exchange of information,
8 data, opinions, or thoughts, whether orally, in writing or otherwise, including but not limited to
9 reports, mailings, conversations, meetings, letters, notes and telegraphic, facsimile, recordings,
10 telex or computer-assisted electronic messages. References to COMMUNICATIONS with
11 business entities shall be deemed to include present and former officers, directors, employees,
12 agents, attorneys, and/or other representatives or persons acting on behalf of such entities.

13 9. "RELATING TO" or "RELATES TO" means anything that, in whole or in part,
14 constitutes, comprises, contains, describes, evidences, embodies, reflects, refers to, relates to,
15 identifies, states, pertains directly or indirectly to, concerns, discusses, alludes to, responds to,
16 mentions, comments upon, analyzes, explains, summarizes, or is in any other way relevant to the
17 particular subject matter identified.

18 10. "DOCUMENTS" or "DOCUMENT" shall have the broadest meaning permitted
19 by law, including, but not limited to, ALL electronic, written or printed matter, information,
20 communication, or data of any kind, including without limitation e-mail, correspondence,
21 memoranda, notes, opinions, journals, descriptions, recounts, minutes, agenda, contracts,
22 agreements, reports, summaries, inter-office and intra-office COMMUNICATIONS, notations of
23 any sort of conversations, diaries, appointment books or calendars, teletypes, telefax,
24 confirmations, computer data (including information or programs stored in a computer, whether
25 or not ever printed out or displayed) and all graphic or manual records or representations of any
26 kind, including without limitation, digital images, photographs, microfiche, microfilm, videotape,
27 records and motion pictures, and electronic mechanical, or electric records or representations of
28 any kind including, without limitation, information on servers, hard drives, diskettes, CD-ROMs,

1 DVDs, tapes, cassettes, discs, log files, databases, backups, magnetic cards and recordings, and
2 shall also include but not be limited to anything and everything that would fall within the
3 definition of “document” or “writing” as suggested within the Federal Rules of Evidence.

4 11. “COMPLAINT” means the complaint filed by Righthaven against DU and David
5 Allen on or about August 10, 2010 in the United States District Court for the District of Nevada,
6 Case No. 2:10-cv-01356 (Dkt. 1).

7 12. “COUNTERCLAIM” means the Answer and Counterclaim filed by DU on
8 September 27, 2010 in this action (Dkt. 13).

9 13. “LVRJ” means the *Las Vegas Review-Journal* newspaper, its owners, parents,
10 subsidiaries, divisions, and affiliates, including, any present or former officers, directors, trustees,
11 employees, agents, representatives, attorneys, or ALL other PERSONS acting, or purporting to
12 act, on its behalf.

13 14. “LVRJ WEBSITE” means all of the content located at www.lvrj.com, including
14 but not limited to news articles, advertisements, links, editorial statements, and statement of
15 policy.

16 15. “DU WEBSITE” means all of the content located at
17 www.democraticunderground.com.

18 16. “NEWS ARTICLE” means the article underlying this action entitled “Tea Party
19 power fuels Angle” published on the LVRJ WEBSITE, shown in Exhibit 2 to the COMPLAINT.

20 17. “WEB PAGE” means a document connected to the World Wide Web, consisting
21 of an HTML file and any related files for scripts and graphics.

22 18. “PAGE VIEW” means a request to load a single HTML file (' page') of an Internet
23 site.

24 19. “EXCERPT” means the portion of the NEWS ARTICLE posted on the DU
25 WEBSITE, shown in Exhibit 3 to the COMPLAINT.

26 20. The “JULY 19, 2010 ASSIGNMENT” means the purported copyright assignment
27 between Stephens Media and Righthaven for the NEWS ARTICLE, attached as Exhibit 1 to the
28 Declaration of J. Colby Williams in Support of Stephens Media’s Motion to Dismiss or Strike

1 filed in this action (Dkt. 38).

2 21. "SCHEDULING ORDER" means the Joint Discovery Plan and Scheduling Order
3 filed with the Court by the parties on December 3, 2010 (Dkt. 42).

4 22. "WEHCO Media" means WHECO Media, Inc. and WHECO Newspapers, Inc.,
5 their parents, subsidiaries, divisions, affiliates, including, any present or former officers, directors,
6 trustees, employees, agents, representatives, attorneys, or ALL other PERSONS acting, or
7 purporting to act, on its behalf.

8 23. "Media News Group" means Media News Group, Inc., its parents, subsidiaries,
9 divisions, affiliates, including, any present or former officers, directors, trustees, employees,
10 agents, representatives, attorneys, or ALL other PERSONS acting, or purporting to act, on its
11 behalf.

12 24. "Clickability, Inc." means Clickability, Inc., its parents, subsidiaries, divisions,
13 affiliates, including, any present or former officers, directors, trustees, employees, agents,
14 representatives, attorneys, or ALL other PERSONS acting, or purporting to act, on its behalf.

15 25. The term "ALL" means "any and all."

16 26. The terms "or" and "and" shall be read in the conjunctive and in the disjunctive
17 wherever they appear such that neither of these words shall be interpreted to limit the scope of
18 these requests.

19 27. Words in the singular shall, where the context permits, include the plural and
20 words used in the plural shall, where the context permits, include the singular.

21 **INSTRUCTIONS**

22 1. In answering the following requests for production, furnish all available
23 documents in the possession, custody, or control of any of Stephens Media's attorneys, directors,
24 officers, agents, employees, representatives, associates, investigators or division affiliates,
25 partnerships, parents or subsidiaries and persons under Stephens Media's control.

26 2. Electronic records and computerized information must be produced in an
27 intelligible format, together with a description of the system from which they were derived
28 sufficient to permit rendering the records and information intelligible. Further, electronic records

1 and computerized information must be produced pursuant to any agreement or agreements
2 between the parties as reflected in the correspondence between the parties.

3 3. Selection of documents from the files and other sources and the numbering of such
4 documents shall be performed in such a manner as to ensure that the source of each document
5 may be determined, if necessary.

6 4. File folders with tabs or labels or directories of files identifying documents must
7 be produced intact with such documents.

8 5. Documents attached to each other shall not be separated.

9 6. If any information requested is claimed to be privileged, immune from discovery
10 or otherwise not discoverable, please provide all information falling within the scope of the
11 request for production which is discoverable, and for each item of information contained in a
12 document to which a claim of privilege is made, identify such document with sufficient
13 particularity for purposes of a motion to compel, such identification to include at least the
14 following:

15 (a) the basis on which the privilege is claimed;

16 (b) the names and positions of the author of the document and all other persons
17 participating in the preparation of the document;

18 (c) the name and position of each individual or other person to whom the
19 document, or a copy thereof, was sent or otherwise disclosed;

20 (d) the date of the document;

21 (e) a description of any accompanying material transmitted with or attached to
22 such document;

23 (f) the number of pages in such document;

24 (g) the particular document request to which such document is responsive; and

25 (h) whether any business or non-legal matter is contained or discussed in such
26 document.

27 7. If Stephens Media's response to a particular request for production is a statement
28 that it lacks the ability to comply with that request, it must specify whether the inability to comply

1 is because the particular item or category of information never existed, has been destroyed, has
2 been lost, misplaced, or stolen, or has never been, or is no longer, in Stephens Media's
3 possession, custody, or control, in which case the name and address of any person or entity
4 known or believed by you to have possession, custody, or control of that information or category
5 of information must be identified.

6 **REQUESTS FOR PRODUCTION**

7 **DOCUMENT REQUEST NO. 1:**

8 ALL DOCUMENTS supporting any allegations made in the COMPLAINT.

9 **DOCUMENT REQUEST NO. 2:**

10 ALL DOCUMENTS supporting any allegations that may be made in any answer to the
11 COUNTERCLAIM.

12 **DOCUMENT REQUEST NO. 3:**

13 ALL DOCUMENTS concerning any assignment of rights in the NEWS ARTICLE to
14 Righthaven.

15 **DOCUMENT REQUEST NO. 4:**

16 ALL DOCUMENTS reflecting any COMMUNICATIONS between Righthaven and any
17 other PERSON or entity, including YOU, RELATING TO assignment or reversion of rights in
18 the NEWS ARTICLE.

19 **DOCUMENT REQUEST NO. 5:**

20 ALL DOCUMENTS concerning any COMMUNICATIONS between Righthaven and
21 Stephens Media RELATING TO assignment or reversion of rights in any other work.

22 **DOCUMENT REQUEST NO. 6:**

23 ALL DOCUMENTS concerning any COMMUNICATION between Righthaven and
24 Stephens Media regarding conduct of, or claims against, Defendants.

25 **DOCUMENT REQUEST NO. 7:**

26 ALL DOCUMENTS concerning any joint defense, common interest, or other agreements
27 for cooperation in litigation or preservation of privileges between Righthaven and Stephens
28 Media.

1 **DOCUMENT REQUEST NO. 8:**

2 ALL DOCUMENTS that refer or RELATE TO any “monetary commitments” referenced
3 in the JULY 19, 2010 ASSIGNMENT.

4 **DOCUMENT REQUEST NO. 9:**

5 ALL DOCUMENTS that refer or RELATE TO any “commitments to provide services
6 and/or already provided” referenced in the JULY 19, 2010 ASSIGNMENT.

7 **DOCUMENT REQUEST NO. 10:**

8 ALL DOCUMENTS that refer or RELATE TO any “right of reversion” referenced in the
9 JULY 19, 2010 ASSIGNMENT.

10 **DOCUMENT REQUEST NO. 11:**

11 ALL DOCUMENTS that refer or RELATE TO any “good and valuable consideration”
12 referenced in the JULY 19, 2010 ASSIGNMENT.

13 **DOCUMENT REQUEST NO. 12:**

14 ALL DOCUMENTS RELATING TO Righthaven’s use or potential future uses of the
15 NEWS ARTICLE.

16 **DOCUMENT REQUEST NO. 13:**

17 ALL DOCUMENTS RELATING TO Stephens Media’s use or potential future uses of the
18 NEWS ARTICLE.

19 **DOCUMENT REQUEST NO. 14:**

20 ALL DOCUMENTS reflecting the names and addresses (whether electronic mail
21 addresses or otherwise) of any PERSON communicating about Defendants’ use of the NEWS
22 ARTICLE, including any individuals at Righthaven, at Stephens Media, or any other PERSON
23 with whom Stephens Media has communicated.

24 **DOCUMENT REQUEST NO. 15:**

25 ALL DOCUMENTS that refer or RELATE TO any licensing or attempted licensing of the
26 NEWS ARTICLE by Stephens Media or Righthaven.

27 **DOCUMENT REQUEST NO. 16:**

28 ALL DOCUMENTS that refer or RELATE TO any plans to license the NEWS

1 ARTICLE.

2 **DOCUMENT REQUEST NO. 17:**

3 ALL DOCUMENTS that refer or RELATE TO any licensing or attempted licensing of
4 copyrighted works originating with the LVRJ by YOU.

5 **DOCUMENT REQUEST NO. 18:**

6 ALL DOCUMENTS that refer or RELATE TO any plans to license any copyrighted
7 works by YOU.

8 **DOCUMENT REQUEST NO. 19:**

9 ALL DOCUMENTS that reflect any settlements by Stephens Media or Righthaven of
10 claims for copyright infringement related to any article published in the LVRJ.

11 **DOCUMENT REQUEST NO. 20:**

12 ALL COMMUNICATIONS with any PERSON by Stephens Media or Righthaven
13 RELATING TO terms for settlements for claims of copyright infringement in any article
14 published by the LVRJ.

15 **DOCUMENT REQUEST NO. 21:**

16 YOUR articles of organization.

17 **DOCUMENT REQUEST NO. 22:**

18 ALL DOCUMENTS RELATING TO any harm to Stephens Media as a result of any use
19 of the NEWS ARTICLE by Defendants.

20 **DOCUMENT REQUEST NO. 23:**

21 ALL DOCUMENTS evidencing or RELATING TO any harm to Stephens Media as a
22 result of any allegedly unauthorized use of any LVRJ article.

23 **DOCUMENT REQUEST NO. 24:**

24 ALL DOCUMENTS evidencing or RELATING TO any harm to Righthaven as a result of
25 any use of the NEWS ARTICLE by Defendants.

26 **DOCUMENT REQUEST NO. 25:**

27 ALL DOCUMENTS evidencing or RELATING TO any harm to Stephens Media that
28 could result if uses such as those by Democratic Underground of the NEWS ARTICLE became

1 widespread.

2 **DOCUMENT REQUEST NO. 26:**

3 Any analyses, studies, reports, or COMMUNICATIONS regarding the actual or potential
4 impact on the newspaper industry, of copying of newspaper articles, or portions thereof, on
5 Internet websites.

6 **DOCUMENT REQUEST NO. 27:**

7 ALL logs of any kind or other data reflecting or RELATING TO the NEWS ARTICLE's
8 display on the LVRJ WEBSITE, including without limitation, those reflecting views of the
9 NEWS ARTICLE, dates, IP address sufficient to identify geography of viewer, source of the
10 viewer, actions by the viewer, sharing or printing by the viewer, advertising displayed with the
11 NEWS ARTICLE, revenue from such advertising.

12 **DOCUMENT REQUEST NO. 28:**

13 ALL DOCUMENTS evidencing or RELATING TO Stephens Media's revenue received
14 in whole or in part as a result of display of the NEWS ARTICLE, including without limitation the
15 number of incidents generating revenue (whether paid per click or per display or otherwise), price
16 per incident, date and payor.

17 **DOCUMENT REQUEST NO. 29:**

18 ALL DOCUMENTS evidencing or RELATING TO Stephens Media's revenue from the
19 LVRJ WEBSITE from 2008 to the present, including without limitation documentation of
20 amounts received daily, sources of those amounts, type of revenue (*e.g.*, PPC, CPM, etc.),
21 average pricing, and average number of events generating revenues.

22 **DOCUMENT REQUEST NO. 30:**

23 ALL business plans for the LVRJ WEBSITE.

24 **DOCUMENT REQUEST NO. 31:**

25 ALL marketing plans for the LVRJ WEBSITE.

26 **DOCUMENT REQUEST NO. 32:**

27 ALL business plans of Stephens Media.
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1 **DOCUMENT REQUEST NO. 33:**

2 ALL marketing plans and marketing materials of Stephens Media.

3 **DOCUMENT REQUEST NO. 34:**

4 ALL DOCUMENTS referring or RELATING TO the registration of any copyright in the
5 NEWS ARTICLE, including, without limitation, internal COMMUNICATIONS and
6 COMMUNICATIONS with the United States Copyright Office.

7 **DOCUMENT REQUEST NO. 35:**

8 ALL DOCUMENTS that refer or RELATE TO any attempt YOU made to mitigate
9 damages in connection with the NEWS ARTICLE.

10 **DOCUMENT REQUEST NO. 36:**

11 ALL DOCUMENTS referring or RELATING TO the creation of Righthaven, including,
12 without limitation, ALL COMMUNICATION among its founders and funders.

13 **DOCUMENT REQUEST NO. 37:**

14 ALL statements from YOUR bank or other financial institution since January 1, 2008.

15 **DOCUMENT REQUEST NO. 38:**

16 ALL DOCUMENTS that refer or RELATE TO any revenue or income received by YOU
17 since January 1, 2008, including but not limited to revenue attributable to the licensing or sales of
18 copyrights.

19 **DOCUMENT REQUEST NO. 39:**

20 ALL financial DOCUMENTS RELATING TO Righthaven's use of the NEWS ARTICLE

21 **DOCUMENT REQUEST NO. 40:**

22 ALL financial DOCUMENTS RELATING TO the YOUR use of the NEWS ARTICLE

23 **DOCUMENT REQUEST NO. 41:**

24 ALL COMMUNICATIONS that refer or RELATE TO the Defendants in this lawsuit
25 (excluding any assertedly privileged COMMUNICATIONS, which shall be logged pursuant to
26 the SCHEDULING ORDER).

27 **DOCUMENT REQUEST NO. 42:**

28 ALL COMMUNICATIONS that refer or RELATE TO the NEWS ARTICLE (excluding

1 any assertedly privileged COMMUNICATIONS, which shall be logged pursuant to the
2 SCHEDULING ORDER).

3 **DOCUMENT REQUEST NO. 43:**

4 ALL COMMUNICATIONS that refer or RELATE TO Righthaven (excluding any
5 assertedly privileged COMMUNICATIONS, which shall be logged pursuant to the
6 SCHEDULING ORDER).

7 **DOCUMENT REQUEST NO. 44:**

8 ALL COMMUNICATIONS that refer or RELATE TO Net Sortie Systems LLC
9 (excluding any assertedly privileged COMMUNICATIONS, which shall be logged pursuant to
10 the SCHEDULING ORDER).

11 **DOCUMENT REQUEST NO. 45:**

12 ALL COMMUNICATIONS that refer or RELATE TO SI Content Monitor LLC
13 (excluding any assertedly privileged COMMUNICATIONS, which shall be logged pursuant to
14 the SCHEDULING ORDER).

15 **DOCUMENT REQUEST NO. 46:**

16 ALL COMMUNICATIONS that refer or RELATE TO WEHCO Media (excluding any
17 assertedly privileged COMMUNICATIONS, which shall be logged pursuant to the
18 SCHEDULING ORDER).

19 **DOCUMENT REQUEST NO. 47:**

20 ALL COMMUNICATIONS that refer or RELATE TO Media News Group (excluding
21 any assertedly privileged COMMUNICATIONS, which shall be logged pursuant to the
22 SCHEDULING ORDER).

23 **DOCUMENT REQUEST NO. 48:**

24 ALL COMMUNICATIONS that refer or RELATE TO Clickability, Inc. (excluding any
25 assertedly privileged COMMUNICATIONS, which shall be logged pursuant to the
26 SCHEDULING ORDER).

27 **DOCUMENT REQUEST NO. 49:**

28 ALL COMMUNICATIONS between YOU and Steven Gibson.

1 **DOCUMENT REQUEST NO. 50:**

2 ALL COMMUNICATIONS between YOU and Charles Coons.

3 **DOCUMENT REQUEST NO. 51:**

4 ALL COMMUNICATIONS between YOU and Joseph Chu.

5 **DOCUMENT REQUEST NO. 52:**

6 ALL COMMUNICATIONS between YOU and Carlyn Dilger

7 **DOCUMENT REQUEST NO. 53:**

8 ALL COMMUNICATIONS between YOU and Jackson Farrow

9 **DOCUMENT REQUEST NO. 54:**

10 ALL COMMUNICATIONS between YOU and Kathy Bryant

11 **DOCUMENT REQUEST NO. 55:**

12 ALL COMMUNICATIONS between YOU and Warren Stephens

13 **DOCUMENT REQUEST NO. 56:**

14 ALL contracts, agreements, investment DOCUMENTS, or other terms between YOU and
15 Righthaven.

16 **DOCUMENT REQUEST NO. 57:**

17 ALL DOCUMENTS that refer or RELATE TO the agreement referenced by Mark
18 Hinueber on KUAR FM 89.1 on or around Sep. 29, 2010 when he said “Righthaven’s made the
19 decision that based on their agreement with us, they’re not going to send [cease and desist]
20 notices.”

21 **DOCUMENT REQUEST NO. 58:**

22 ALL COMMUNICATIONS referenced by Mark Hinueber when he noted that “many
23 websites ask permission before posting the paper’s articles, and that he routinely grants such
24 permissions” in the article available at
25 <http://www.law.com/jsp/cc/PubArticleCC.jsp?id=1202466627090>

26 **DOCUMENT REQUEST NO. 59:**

27 ALL DOCUMENTS that refer or RELATE TO the investment referenced by Mark
28 Hinueber when he said “the investment in Righthaven was made by a company affiliated with the

1 Stephens family” in the article originally published at

2 <http://www.arkansasonline.com/news/2010/aug/26/firm-holds-websites-law-20100826/>

3 **DOCUMENT REQUEST NO. 60:**

4 ALL DOCUMENTS that refer or RELATE TO any rights or agreements referenced by
5 Mark Hinueber when he said “I can tell Righthaven not to sue somebody” in the article originally
6 published at [http://www.arkansasonline.com/news/2010/aug/26/firm-holds-websites-law-](http://www.arkansasonline.com/news/2010/aug/26/firm-holds-websites-law-20100826/)
7 [20100826/](http://www.arkansasonline.com/news/2010/aug/26/firm-holds-websites-law-20100826/)

8 **DOCUMENT REQUEST NO. 61:**

9 ALL COMMUNICATIONS received by YOU in response to Sherman Frederick’s
10 statement “If you’d like find out more about working with Righthaven to protect your
11 copyrighted material or you would like to inquire about using any of my company’s content, you
12 may do so by contacting our general counsel, Mark Hinueber, at
13 mhinueber@stephensmedia.com” published at
14 http://www.lvrj.com/blogs/sherm/Copyright_theft_Were_not_taking_it_anymore.html

15 **DOCUMENT REQUEST NO. 62:**

16 Any COMMUNICATIONS sent in response to the COMMUNICATIONS to
17 mhinueber@stephensmedia.com referenced in the preceding Request.

18 **DOCUMENT REQUEST NO. 63:**

19 ALL DOCUMENTS that refer or RELATE TO Sherman Frederick’s columns published
20 in the LVRJ concerning Righthaven, including but not limited to *Copyright theft: We’re not*
21 *taking it anymore, Las Vegas Review-Journal, (May 28, 2010); Protecting newspaper content --*
22 *You either do it, or you don't, Las Vegas Review-Journal, (Sept. 1, 2010); Protecting Newspaper*
23 *Content II: Thieves are thieves, Las Vegas Review-Journal (Sep. 2, 2010).*

24 **DOCUMENT REQUEST NO. 64:**

25 ALL DOCUMENTS that refer or RELATE TO the “Privacy Statement,” currently located
26 at www.stephensmedia.com/privacy-statement/, including all versions of the Privacy Statement.

27 **DOCUMENT REQUEST NO. 65:**

28 ALL DOCUMENTS that refer or RELATE TO the comment policy set forth at

1 <http://www.lvrj.com/home/6729126.html>, including all versions of the comment policy.

2 **DOCUMENT REQUEST NO. 66:**

3 ALL DOCUMENTS that refer or RELATE TO the “Share & Save” feature for articles on
4 the LVRJ WEBSITE.

5 **DOCUMENT REQUEST NO. 67:**

6 ALL DOCUMENTS that refer or RELATE TO the robots.txt file located at
7 www.lvrj.com/robots.txt, including the version of the file published on May 13, 2010.

8 **DOCUMENT REQUEST NO. 68:**

9 The version of the <http://www.lvrj.com/templates/news-sitemap.xml> file that was present
10 on May 13, 2010.

11 **DOCUMENT REQUEST NO. 69:**

12 ALL DOCUMENTS that refer or RELATE TO the facts underlying YOUR statement on
13 page 2 of Docket 38 that “Stephens Media’s involvement with Righthaven...is limited to its role
14 as the assignor of the subject copyright.”

15
16 Dated: December 17, 2010

FENWICK & WEST LLP

17
18 By: /s/ Clifford C. Webb
19 CLIFFORD C. WEBB, ESQ

20 Attorneys for Defendant and Counterclaimant
21 DEMOCRATIC UNDERGROUND, LLC, and
22 Defendant DAVID ALLEN
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