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$2 \mid I \mid A$	Attorneys for Plaintiff	
3		
4	UNITED STATES	DISTRICT COURT
5	DISTRICT	OF NEVADA
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	RIGHTHAVEN LLC, a Nevada limited- iability company,	Case No.: 2:10-cv-01762-JCM-PAL
9		MOTION FOR EXTENSION OF TIME TO SERVE FOREIGN DEFENDANTS
	Plaintiff,	(First Request)
1	ν.	
2	GARRY NEWMAN, an individual,	
3	Defendant.	
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5	Plaintiff. RIGHTHAVEN LLC ("Right	naven"), by and through undersigned counsel,
6		a von), og and anough andersighed counsel,
7 f	files this Motion for Extension of Time to Serve	e Defendant, GARRY NEWMAN, a foreign
B i	ndividual ("Mr. Newman" and/or "Defendant") and in support thereof states:
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1. Plaintiff filed a Complaint (Docket No.: 1) on or about October 12, 2010, for	ļ
copyright infringement against Defendant.	
2. Defendant is located in Walsall, England.	
3. Pursuant to Fed.R.Civ.Proc. 4(f), service of the initial process and pleading upon	
Mr. Newman, an individual in a foreign country, is permitted by:	
 "(1) by any internationally agreed means of service that is reasonably calculated to give notice, such as those authorized by the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents; (2) if there is no internationally agreed means, or if an international agreement allows but does not specify other means, by a method that is reasonably calculated to give notice: 	
action in its courts of general jurisdiction;	
request; or	
(i) delivering a copy of the summons and of the complaint to the	
(ii) using any form of mail that the clerk addresses and sends to the	
(3) by other means not prohibited by international agreement, as the court orders."	
3. Therefore, Plaintiff must serve Defendants through the Hague Convention, which	
takes many weeks for such service.	
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	 copyright infringement against Defendant. Defendant is located in Walsall, England. Pursuant to Fed.R.Civ.Proc. 4(f), service of the initial process and pleading upon Mr. Newman, an individual in a foreign country, is permitted by: (1) by any internationally agreed means of service that is reasonably calculated to give notice, such as those authorized by the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents; (2) if there is no internationally agreed means, or if an international agreement allows but does not specify other means, by a method that is reasonably calculated to give notice: (A) as prescribed by the foreign country's law for service in that country in an action in its courts of general jurisdiction; (B) as the foreign authority directs in response to a letter rogatory or letter of request; or (C) unless prohibited by the foreign country's law for service in that country in an action in its courts of general jurisdiction; (B) as the foreign authority directs in response to a letter rogatory or letter of request; or (C) unless prohibited by the foreign country's law for service in that country in an action in its courts of general jurisdiction; (B) as the foreign authority directs is nesponse to a letter rogatory or letter of request; or (C) unless prohibited by the foreign country's law, by: (i) delivering a copy of the summons and of the complaint to the individual and that requires a signed receipt; or (3) by other means not prohibited by international agreement, as the court orders." 3. Therefore, Plaintiff must serve Defendants through the Hague Convention, which takes many weeks for such service.

1	WHEREFORE, for good cause shown, Plaintiff requests that this Court to grant its		
2	Motion for Extension of Time to Serve Defendants, and allow an additional 90 days in which to		
3	serve the foreign Defendants with the initial process and pleading.		
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5	Dated this 16 th day of March, 2011.		
6	RIGHTHAVEN LLC		
7	By: /s/ Anne E. Pieroni		
8	ANNE E. PIERONI, ESQ. Nevada Bar No. 9650		
9	apieroni@righthaven.com Counsel at Righthaven LLC		
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	Fax: (702) 922-3851		
19	Attorneys for Plaintiff		
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23	IT IS SO ORDERED:		
24	Jugar a. Seen		
25	UNITED STATES MAGISTRATE JUDGE		
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27	DATED: March 18, 2011		
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1	CERTIFICATE OF SERVICE
2	Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that I am an employee
	of Righthaven LLC and that on this 16 th day of March, 2011, I caused MOTION FOR
3	EXTENSION OF TIME TO SERVE FOREIGN DEFENDANT (First Request) to be to be
4	served by the Court's CM/ECF system.
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7	By: <u>/s/ Anne E. Pieroni</u>
8	An Employee of Righthaven LLC
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