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UNITED STATES DISTRICT COURT **DISTRICT OF NEVADA**

RIGHTHAVEN LLC, a Nevada limitedliability company,

Plaintiff,

ANNE E. PIERONI, ESQ. Nevada Bar No. 9650

apieroni@righthaven.com

Tel.: (702) 527-5900

Fax: (702) 527-5909

Las Vegas, Nevada 89129-7701

9960 West Cheyenne Avenue, Suite 210

v.

GARRY NEWMAN, an individual,

Defendant.

Case No.: 2:10-cv-01762-JCM-PAL

MOTION AND PROPOSED ORDER TO WITHDRAW AS COUNSEL OF RECORD WITH CERTIFICATE OF SERVICE

ANNE E. PIERONI, ESQ. respectfully moves this court for an order permitting Anne Pieroni, Esq. ("Ms. Pieroni"), who has appeared in these proceedings, to withdraw as counsel for Righthaven LLC ("Righthaven"), in the above captioned matter, pursuant to Local Rule IA 10-6, S.C.R 46, and N.R.P.C 1.16 (b)(1) and (7). This Motion is made and based upon the Memorandum of Points and Authorities submitted herein, as well as the pleadings and papers on file herein.

MEMORANDUM OF POINTS AND AUTHORITIES

Ms. Pieroni is no longer employed as counsel at Righthaven. Furthermore, Ms. Pieroni was not retained to represent Righthaven as outside counsel, in the above captioned matter, or any other pending case or matter before this Court on behalf of Righthaven. The Local Rule IA 10-6 (a) provides that "No attorney may withdraw after appearing in a case except by leave of court after notice served on the affected client and opposing counsel." Righthaven received notice of Ms. Pieroni's intent to withdraw from this case, and all other Righthaven cases, upon Ms. Pieroni's final week of employment with Righthaven.

Additionally, all parties in this case will receive notice of this Motion to Withdraw via the CM/ECF system, pursuant to the certificate of service attached herein. Additionally, Local Rule IA 10-6 (e) provides that "no withdrawal... shall be approved if delay of discovery, the trial or any hearing in the case would result." Here, no delay of any kind will result from Ms. Pieroni's withdrawal because Righthaven is represented in this matter by outside counsel, Shawn A. Mangano, Esq., who is filing a Notice of Appearance in this matter concurrently herewith, as well as represented by various in-house counsel employed by Righthaven. Ms. Pieroni's withdrawal will not prejudice either party or delay any proceeding in this matter.

CONCLUSION

For the reasons set forth above, Ms. Pieroni respectfully moves this Court to enter an Order approving the withdrawal of Ms. Pieroni as a counsel of record for Righthaven in the above captioned matter.

Dated this 6th day of April, 2011.

By: /s/ Anne E. Pieroni, Esq.
ANNE E. PIERONI, ESQ.
Nevada Bar No. 9650
apieroni@righthaven.com
9960 West Cheyenne Avenue, Suite 210
Las Vegas, Nevada 89129-7701
Tel.: (702) 527-5900

IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE

DATED:

CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that on this 6th day of April, 2011, I caused a copy of the MOTION AND PROPOSED ORDER TO WITHDRAW AS COUNSEL OF RECORD WITH CERTIFICATE OF SERVICE to be served by the Court's CM/ECF system.

By: /s/ Anne Pieroni