

1 ANNE E. PIERONI, ESQ.  
2 Nevada Bar No. 9650  
3 apieroni@righthaven.com  
4 9960 West Cheyenne Avenue, Suite 210  
5 Las Vegas, Nevada 89129-7701  
6 Tel.: (702) 527-5900  
7 Fax: (702) 527-5909

8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

RIGHTHAVEN LLC, a Nevada limited-  
liability company,

Plaintiff,

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.



**CERTIFICATE OF SERVICE**

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that on this 6<sup>th</sup> 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