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5 *Attorneys for Plaintiff Righthaven LLC*

6
 7 **UNITED STATES DISTRICT COURT**
 8 **DISTRICT OF NEVADA**
 9

10 RIGHTHAVEN LLC, a Nevada limited-
 liability company,

11
 12 Plaintiff,

13 v.

14 GARRY NEWMAN, an individual; and
 FACEPUNCH STUDIOS LTD., a limited
 15 company formed under the laws of Great
 Britain,

16
 17 Defendants.

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

**PLAINTIFF RIGHTHAVEN LLC'S
 MOTION FOR EXTENSION OF TIME
 TO RESPOND TO DEFENDANT GARRY
 NEWMAN'S MOTION TO DISMISS THE
 FIRST AMENDED COMPLAINT FOR
 LACK OF SUBJECT MATTER
 JURISDICTION AND LACK OF
 PERSONAL JURISDICTION**

(FIRST REQUEST)

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 19
 20 Righthaven LLC ("Righthaven") hereby moves the Court for an extension of time to
 21 respond to Defendant Garry Newman's ("Defendant") Motion to Dismiss the First Amended
 22 Complaint for Lack of Subject Matter Jurisdiction and Lack of Jurisdiction (Doc. # 25, the
 23 "Motion").

24 Righthaven requests an extension of time until Friday, August 19, 2011 to file a response
 25 to Defendant's Motion. This is Righthaven's first requested extension of time related to its
 26 response to the Motion. Righthaven's counsel requests this extension of time because of the
 27

1 unexpected hospitalization of a close friend and client yesterday afternoon at Valley Hospital.
2 This individual was admitted to the emergency room for treatment while his wife and two young
3 children were out of town. Due to the individual's hospitalization, Righthaven's counsel was
4 away from the office until late in the evening and then required to return to the hospital for a
5 large portion of the day today. These unexpected events have prevented counsel from preparing
6 a response to the Motion. Moreover, these unexpected events have prevented counsel from
7 attempting to secure a stipulation for the requested extension of time. Righthaven consents to
8 Defendant being give a three (3) day extension of time to file a reply to the response should this
9 requested continuance be granted. This requested extension of time is sought in good faith and
10 not for the purposes of delay.

11 Dated this 16th day of August, 2011.

12 SHAWN A. MANGANO, LTD.

13 By: /s/ Shawn A. Mangano, Esq. _____
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21 *Attorney for Plaintiff Righthaven LLC*

22 IT IS SO ORDERED:

23
24 UNITED STATES DISTRICT JUDGE
25 DATED: _____
26
27
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1 **CERTIFICATE OF SERVICE**

2 Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that on this 16th day of
3 August, 2011, I caused **PLAINTIFF RIGHTHAVEN LLC'S MOTION FOR EXTENSION**
4 **OF TIME TO RESPOND TO DEFENDANT GARRY NEWMAN'S MOTION TO**
5 **DISMISS THE FIRST AMENDED COMPLAINT FOR LACK OF SUBJECT MATTER**
6 **JURISDICTION AND LACK OF PERSONAL JURISDICTION** to be served by the Court's
7 CM/ECF system.

8 By: /s/ Shawn A. Mangano
9 Shawn A. Mangano, Esq.
10 SHAWN A. MANGANO, LTD.