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13  
14 **UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF NEVADA**

16 RIGHTHAVEN LLC, a Nevada limited-  
17 liability company,

18  
19 Plaintiff,

20 v.

21 JUSTMEANS, an entity of unknown origin  
and nature; MARTIN SMITH, an individual;  
22 and ANDREA BRENNEN, an individual,

23 Defendants.  
24

Case No.: 2:10-cv-02179

25  
26 **COMPLAINT AND DEMAND**  
27 **FOR JURY TRIAL**

28 Righthaven LLC (“Righthaven”) complains as follows against Justmeans (“Justmeans”),  
Martin Smith (“Mr. Smith”) and Andrea Brennen (“Ms. Brennen”); collectively with Justmeans  
and Mr. Smith known herein as the “Defendants”) on information and belief:







**CLAIM FOR RELIEF: COPYRIGHT INFRINGEMENT**

32. Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through 31 above.

33. Righthaven holds the exclusive right to reproduce the Work, pursuant to 17 U.S.C. § 106(1).

34. Righthaven holds the exclusive right to prepare derivative works based upon the Work, pursuant to 17 U.S.C. § 106(2).

35. Righthaven holds the exclusive right to distribute copies of the Work, pursuant to 17 U.S.C. § 106(3).

36. Righthaven holds the exclusive right to publicly display the Work, pursuant to 17 U.S.C. § 106(5).

37. The Defendants reproduced the Work in derogation of Righthaven's exclusive rights under 17 U.S.C. § 106(1).

38. The Defendants created an unauthorized derivative of the Work in derogation of Righthaven's exclusive rights under 17 U.S.C. § 106(2).

39. The Defendants distributed, and continue to distribute, an unauthorized reproduction of the Work on the Website, in derogation of Righthaven's exclusive rights under 17 U.S.C. § 106(3).

40. The Defendants publicly displayed, and continue to publicly display, an unauthorized reproduction of the Work on the Website, in derogation of Righthaven's exclusive rights under 17 U.S.C. § 106(5).

41. Justmeans willfully engaged in the copyright infringement of the Work.

42. Mr. Smith willfully engaged in the copyright infringement of the Work.

43. Ms. Brennan willfully engaged in the copyright infringement of the Work.

44. The Defendants' acts as alleged herein, and the ongoing direct results of those acts, have caused and will continue to cause irreparable harm to Righthaven in an amount Righthaven cannot ascertain, leaving Righthaven with no adequate remedy at law.



