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5 *Attorney for Plaintiff Righthaven LLC*

6
 7 **UNITED STATES DISTRICT COURT**
 8 **DISTRICT OF NEVADA**
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10 RIGHTHAVEN LLC, a Nevada limited-
 liability company,

11
 12 **Plaintiff,**

13 v.

14 LAW MED CONSULTING LLC, a Maryland
 15 limited-liability company; LAW MED BLOG,
 an entity of unknown origin and nature; and
 16 GREG STOCKS, an individual,

17 **Defendants.**
 18

Case No.: 2:11-cv-00717

**COMPLAINT AND DEMAND
 FOR JURY TRIAL**

19 Righthaven LLC (“Righthaven”) complains as follows against Law Med Consulting LLC
 20 (“Law Med Consulting”), Law Med Blog (“Law Med Blog”) and Greg Stocks (“Mr. Stocks”;
 21 collectively with Law Med Consulting and Law Med Blog known herein as the “Defendants”)
 22 on information and belief, and at all times relevant to this lawsuit, unless otherwise specifically
 23 indicated herein to the contrary:
 24

25 **NATURE OF ACTION**

- 26 1. This is an action for copyright infringement pursuant to 17 U.S.C. § 501.
 27
 28

1 **PARTIES**

2 2. Righthaven is a Nevada limited-liability company with its principal place of
3 business in Nevada.

4 3. Righthaven is in good standing with the Nevada Secretary of State.

5 4. Law Med Consulting is a forfeited Maryland limited-liability company.

6 5. Mr. Stocks is identified by Mr. Stocks' LinkedIn profile, as the owner of Law
7 Med Consulting, attached hereto as Exhibit 1.

8 6. Law Med Consulting is identified by the current registrar, GoDaddy.com
9 ("GoDaddy"), as the registrant of the Internet domain found at <lawmedconsultant.com> (the
10 "Domain").

11 7. Law Med Consulting is identified by GoDaddy as an administrative contact and
12 technical contact of the Domain (the content accessible through the Domain and the Domain
13 itself known herein as the "Website").

14 8. Mr. Stocks is identified by GoDaddy as an administrative contact and technical
15 contact of the Domain.

16 9. Law Med Blog is an entity of unknown origin and nature.

17 10. Attempts to find evidence of the formal organizational status in the respective
18 Secretary of State offices of Delaware, California, Illinois, Maryland, Nevada, New York, Texas
19 and Tennessee demonstrate that, at least with respect to these states, Law Med Blog is not a
20 formally organized business entity.

21 11. Law Med Blog is the self-proclaimed owner of the copyright(s) in the work(s)
22 displayed on the Website, as evidenced by a copyright notice displayed on the Website: © 2011
23 Law Med Blog. All Rights Reserved.”

24 **JURISDICTION**

25 12. This Court has original subject matter jurisdiction over this copyright
26 infringement action pursuant to 28 U.S.C. § 1331 and 28 U.S.C. § 1338(a).
27
28

1 35. Righthaven holds the exclusive right to distribute copies of the Work, pursuant to
2 17 U.S.C. § 106(3).

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

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

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

9 39. The Defendants distributed, and continue to distribute, an unauthorized
10 reproduction of the Work on the Website, in derogation of Righthaven’s exclusive rights under
11 17 U.S.C. § 106(3).

12 40. The Defendants publicly displayed, and continue to display, an unauthorized
13 reproduction of the Work on the Website, in derogation of Righthaven’s exclusive rights under
14 17 U.S.C. § 106(5).

15 41. Law Med Consulting has willfully engaged in the copyright infringement of the
16 Work.

17 42. Law Med Blog has willfully engaged in the copyright infringement of the Work.

18 43. Mr. Stocks has willfully engaged in the copyright infringement of the Work.

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

22 45. Unless the Defendants are preliminarily and permanently enjoined from further
23 infringement of the Work, Righthaven will be irreparably harmed, and Righthaven is thus
24 entitled to preliminary and permanent injunctive relief against further infringement by the
25 Defendants of the Work, pursuant to 17 U.S.C. § 502.

PRAYER FOR RELIEF

Righthaven requests that this Court grant Righthaven’s claim for relief herein as follows:

1. Preliminarily and permanently enjoin and restrain the Defendants, and the Defendants’ officers, agents, servants, employees, attorneys, parents, subsidiaries, related companies, partners, and all persons acting for, by, with, through, or under the Defendants, from directly or indirectly infringing the Work by reproducing the Work, preparing derivative works based on the Work, distributing the Work to the public, and/or displaying the Work, or ordering, directing, participating in, or assisting in any such activity;

2. Direct the Defendants to preserve, retain, and deliver to Righthaven in hard copies or electronic copies:

a. All evidence and documentation relating in any way to the Defendants’ use of the Work, in any form, including, without limitation, all such evidence and documentation relating to the Website;

b. All evidence and documentation relating to the names and addresses (whether electronic mail addresses or otherwise) of any person with whom the Defendants have communicated regarding the Defendants’ use of the Work; and

c. All financial evidence and documentation relating to the Defendants’ use of the Work;

3. Order the surrender to Righthaven of all hardware, software, electronic media and domains, including the Domain used to store, disseminate and display the unauthorized versions of any and all copyrighted works as provided for under 17 U.S.C. § 505(b) and/or as authorized by Federal Rule of Civil Procedure 64;

4. Award Righthaven statutory damages for the willful infringement of the Work, pursuant to 17 U.S.C. § 504(c);

5. Award Righthaven costs, disbursements, and attorneys’ fees incurred by Righthaven in bringing this action, pursuant to 17 U.S.C. § 505;

6. Award Righthaven pre- and post-judgment interest in accordance with applicable law; and

