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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 GUNNER’S ALLEY, LLC., a North Carolina
 15 limited-liability company; AFFORDABLE
 HUNTING TRIPS, an entity of unknown
 16 origin and nature; and BRADFORD JUSTUS,
 an individual,

17
 18 **Defendants.**

Case No.: 2:11-cv-00719

**COMPLAINT AND DEMAND
 FOR JURY TRIAL**

19
 20 Righthaven LLC (“Righthaven”) complains as follows against Gunner’s Alley, LLC
 21 (“Gunner’s Alley”), Affordable Hunting Trips (“Affordable Hunting Trips”) and Bradford Justus
 22 (“Mr. Justus”; collectively with Gunner’s Alley and Affordable Hunting Trips known herein as
 23 the “Defendants”) on information and belief, and at all times relevant to this lawsuit, unless
 24 otherwise specifically indicated herein to the contrary:

25
 26 **NATURE OF ACTION**

27 1. This is an action for copyright infringement pursuant to 17 U.S.C. § 501.
 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. Gunner’s Alley is a North Carolina limited-liability company.

6 5. Mr. Justus is identified by the North Carolina Secretary of State business entity
7 database, as a manager of Gunner’s Alley.

8 6. Affordable Hunting Trips is an entity of unknown origin and nature.

9 7. Attempts to find evidence of the formal organizational status in the respective
10 Secretary of State offices of Delaware, California, Illinois, Nevada, New York, North Carolina,
11 Texas and Tennessee demonstrate that, at least with respect to these states, Affordable Hunting
12 Trips is not a formally organized business entity.

13 8. Gunner’s Alley is identified by the current registrar, GoDaddy.com (“GoDaddy”),
14 as the registrant of the Internet domain found at <affordable-hunting-trips.com> (the “Domain”).

15 9. Gunner’s Alley is identified by GoDaddy as an administrative contact and
16 technical contact of the Domain (the content accessible through the Domain and the Domain
17 itself known herein as the “Website”).

18 10. Mr. Justus is identified by GoDaddy as an administrative contact and technical
19 contact of the Domain.

20 11. Affordable Hunting Trips is the self-proclaimed owner of the copyright(s) in the
21 work(s) displayed on the Website, as evidenced by a copyright notice displayed on the Website:
22 “Copyright © 2008 – 2010 Affordable Hunting Trips”.
23

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 13. Righthaven is the owner of the copyright in the literary work entitled, “Leading
28 like a deer in headlights” (the “Work”), attached hereto as Exhibit 1.

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

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

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

9 c. All financial evidence and documentation relating to the Defendants' use
10 of the Work;

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

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

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

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

21 7. Grant Righthaven such other relief as this Court deems appropriate.
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