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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 COMPUTER SERVICES ONE LLC, a  
 15 Florida limited-liability company; and  
 16 NORMAN EDWARDS, an individual,

17 **Defendants.**

Case No.: 2:11-cv-00721

**COMPLAINT AND DEMAND  
 FOR JURY TRIAL**

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 19 Righthaven LLC (“Righthaven”) complains as follows against Computer Services One  
 20 LLC (“Computer Services One”) and Norman Edwards (“Mr. Edwards”; collectively with  
 21 Computer Services One known herein as the “Defendants”) on information and belief, and at all  
 22 times relevant to this lawsuit, unless otherwise specifically indicated herein to the contrary:

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 24 **NATURE OF ACTION**

- 25 1. This is an action for copyright infringement pursuant to 17 U.S.C. § 501.  
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 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. Computer Services One is a Florida limited-liability company.

6 5. Mr. Edwards is identified by the Florida Secretary of State business entity  
7 database, as the Manager/Member of Computer Services One, attached hereto as Exhibit 1.

8 6. Computer Services One is identified by the current registrar, GoDaddy.com  
9 (“GoDaddy”), as the registrant of the Internet domain found at <floridasteaks.com> (the  
10 “Domain”).

11 7. Computer Services One is identified by GoDaddy as an administrative contact  
12 and technical contact of the Domain (the content accessible through the Domain and the Domain  
13 itself known herein as the “Website”).

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

16 9. Computer Services One is the self-proclaimed owner of the copyright(s) in the  
17 work(s) displayed on the Website, as evidenced by a copyright notice displayed on the Website:  
18 “Computer Services One 2010”.

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20 **JURISDICTION**

21 10. This Court has original subject matter jurisdiction over this copyright  
22 infringement action pursuant to 28 U.S.C. § 1331 and 28 U.S.C. § 1338(a).

23 11. Righthaven is the owner of the copyright in the literary work entitled, “Former  
24 mayor lends name to new Ron’s Steakhouse” (the “Work”), attached hereto as Exhibit 2.

25 12. On or about April 13, 2011, the Defendants displayed, and continue to display, an  
26 unauthorized reproduction of the Work (the “Infringement”), attached hereto as Exhibit 3, on the  
27 Website.  
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1           a.       All evidence and documentation relating in any way to the Defendants’  
2 use of the Work, in any form, including, without limitation, all such evidence and  
3 documentation relating to the Website;

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

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

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

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

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

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

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