

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

Civil Action No.: 1:11-cv-00211-JLK

RIGHTHAVEN LLC, a Nevada limited-liability company,

Plaintiff,

v.

BRIAN D. HILL, an individual,

Defendant.

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**DECLARATION OF SARA GLINES IN SUPPORT OF RIGHTHAVEN LLC'S  
RESPONSE TO DEFENDANT BRIAN D. HILL'S MOTION FOR ATTORNEY FEES  
PURSUANT TO APRIL 14, 2011 MINUTE ORDER WITH CERTIFICATE OF  
SERVICE**

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I, Sara Glines, being first duly sworn upon oath, do hereby depose and state:

1. I am, and at all times referenced in this declaration have been, the Vice President of Field Operations for MediaNews Group. *The Denver Post* is a media publication owned by MediaNews Group, of which I am familiar. *The Denver Post* is located at 101 Colfax Avenue, Suite 600, Denver, Colorado 80202. I have personal knowledge of the facts stated herein, and if called upon to testify thereto, would be competent to do so. The declaration is made in support of Plaintiff Righthaven LLC's ("Plaintiff") Response to Defendant Brian D. Hill's Motion for Attorney Fees Pursuant to April 14, 2011 Minute Order With Certificate of Service.

2. *The Denver Post* serves as a major source for hard copy and online news media for the Denver, Colorado area, as well as throughout the State of Colorado.

3. I am personally familiar with the photograph entitled, "TSA Agent performs enhanced pat-downs" (the "Work"), which was attached as Exhibit 2 to Plaintiff's Complaint (Doc. # 1) in this case.

4. The Work was taken by an employee of *The Denver Post*, in the course and scope of his employment with *The Denver Post*, and with the understanding that all rights of any kind in this photo belonged to *The Denver Post*.

5. The Work was taken in the Denver International Airport, located at 8500 Pena Boulevard, Denver, Colorado. No other geographic location is depicted in the Work.

6. The Work was published by *The Denver Post* in Denver, Colorado, on or about was on or about November 18, 2010.

7. The Work's publication was directed toward the residents of Denver, Colorado, as well as to persons living throughout the State of Colorado.

8. Neither the defendant named in this lawsuit, nor anyone on his behalf, ever sought permission from *The Denver Post* to reproduce, display, publish or otherwise use the Work. *The Denver Post* has likewise not authorized the Work to be reproduced, displayed or otherwise disseminated by the Internet website <deadseriousnews.com> or any other like website.

9. On or about December 1, 2010, all rights, title and interest in and to the Work were assigned to the Plaintiff, who intern obtained the copyright registration in and to the Work.

10. *The Denver Post* has been harmed by the unauthorized posting of the Work by the defendants in this action and in other actions because such conduct impairs certain license rights granted to it and/or to MediaNews Group by the Plaintiff.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 5<sup>th</sup> day of May, 2011.     /s/ Sara Glines  
Sara Glines

**CERTIFICATE OF SERVICE**

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that on this 5<sup>th</sup> day of May, 2011, I caused a copy of the **DECLARATION OF SARA GLINES IN SUPPORT OF PLAINTIFF RIGHTHAVEN LLC'S RESPONSE TO DEFENDANT BRIAN D. HILL'S MOTION FOR ATTORNEY FEES PURSUANT TO APRIL 14, 2011 MINUTE ORDER WITH CERTIFICATE OF SERVICE** to be to be served by the Court's CM/ECF system.

By: /s/ Shawn A. Mangano  
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