

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

Civil Action No.: 1:11-cv-00222-JLK

RIGHTHAVEN LLC, a Nevada limited-liability company,

Plaintiff,

v.

WILLIAM SUMNER, an individual; and  
DAILYKIX.COM, an entity of unknown origin and nature,

Defendants.

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**SUPPLEMENTAL DECLARATION OF SARA GLINES IN SUPPORT OF  
PLAINTIFF'S RIGHTHAVEN LLC'S OPPOSITION TO DEFENDANT WILLIAM  
SUMNER'S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION 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 supplemental declaration is made in support of Plaintiff Righthaven LLC's Opposition to Defendant William Sumner's Motion to Dismiss for Lack of Personal Jurisdiction.

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 1 to Plaintiff’s Complaint (Doc. # 1) in this case.

4. The Work attached to Plaintiff’s Complaint is a copy of a photograph that 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 attached to Plaintiff’s Complaint is a copy of a photograph that 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, among other forms of media, the Denver Post website, 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. None of the defendants named in this lawsuit, or anyone on their behalf, has 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, including the right to any and all past, present and future rights to pursue claims of infringement, in and to the Work were assigned to the Plaintiff, who in turn obtained 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 27<sup>th</sup> day of April, 2011.

  
Sara Glines

**CERTIFICATE OF SERVICE**

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that on this 27<sup>th</sup> day of April, 2011, I caused a copy of the **SUPPLEMENTAL DECLARATION OF SARA GLINES IN SUPPORT OF PLAINTIFF RIGHTHAVEN LLC'S OPPOSITION TO DEFENDANT WILLIAM SUMNER'S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION 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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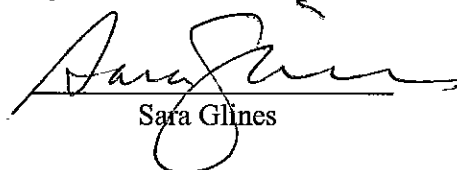
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