IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLORADO

Civil Action No.: 1:11-cv-00830-JLK

RIGHTHAVEN LLC, a Nevada limited-liability company,

Plaintiff,

v.

LELAND WOLF, an individual; and

IT MAKES SENSE BLOG, an entity of unknown origin and nature,

Defendants.

UNOPPOSED MOTION TO WITHDRAW AS COUNSEL

STEVEN G. GANIM, Esq. respectfully moves this Court for an Order permitting Steven G. Ganim ("Mr. Ganim"), who has appeared in these proceedings, to withdraw as counsel for Righthaven LLC ("Righthaven"), in the above-styled matter, pursuant to D.C.COLO.LCivR 83.3 (D) and Rule 1.16 of the Colorado Rules of Professional Conduct. In support thereof, the undersigned states as follows:

- 1. Mr. Ganim is no longer employed by Righthaven, due to recently being laid off.
- 2. Pursuant to Rule 1.16(a)(3) of the Colorado Rules of Professional Conduct, a lawyer is required to withdraw from the representation of a client if the lawyer is discharged.
- 3. Mr. Ganim has complied with the notification requirements of D.C.COLO.LCivR 83.3 (D). Please see the Notice of Withdraw of Appearance, attached hereto as Exhibit "1".
- 4. No party will be prejudiced or otherwise affected by Mr. Ganim's withdrawal, as Righthaven is currently represented by other counsel.
- 5. The relief requested in this Motion is sought in good faith and not for the purposes of delay.

RULE 7.1(A) CERTIFICATION

Mr. Ganim conferred with James Malcolm DeVoy, IV, counsel for defendants in this matter, concerning the relief requested herein. Defendants do not oppose this Motion.

WHEREFORE, the undersigned counsel respectfully requests to withdraw from representing Righthaven in the instant matter.

Dated this 21st day of August, 2011.

By: /s/ Steven G. Ganim STEVEN G. GANIM, ESQ. Post Office Box 230812 Las Vegas, Nevada 89105 Tel: (702) 324.5347 sgganim@gmail.com

CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that on this 21st day of August, 2011, I caused a copy of the MOTION TO WITHDRAW AS COUNSEL to be served via the Court's CM/ECF system, as well as depositing a copy of the foregoing in the United States Mail to the following persons:

Andrew John Contiguglia, Esq. Contiguglia & Fazzone, P.C. 400 South Colorado Blvd., Ste. 830 Denver, CO 80246

James Malcom DeVoy, IV, Esq. Marc John Randazza, Esq. Randazza Legal Group 7001 West Charleston Blvd, #1043 Las Vegas, Nevada 89117

Kurt Bradford Opsahl, Esq. Electronic Frontier Foundation 454 Shotwell Street San Francisco, CA 94110-1914

James John Todd Kincannon, Esq. The Kincannon Firm P.O. Box 7901 Columbia, SC 29202

Righthaven LLC 4475 South Pecos Road Las Vegas, Nevada 89121

/s/ Steven G. Ganim