	Case 2:10-cv-00351-LDG-PAL D	ocument 37	Filed 07/12/10	Page 1 of 2
1 2 3 4 5	STEVEN A. GIBSON, ESQ. Nevada Bar No. 6656 <u>sgibson@righthaven.com</u> J. CHARLES COONS, ESQ. Nevada Bar No. 10553 <u>ccoons@righthaven.com</u> Righthaven LLC 9960 West Cheyenne Avenue, Suite 210 Las Vegas, Nevada 89129-7701 Attorneys for Plaintiff			
6	UNITED STATES DISTRICT COURT			
7 8	DISTRICT OF NEVADA			
9 10 11	RIGHTHAVEN LLC, a Nevada limited- liability company,	JOINT S	: 2:10-cv-0351-LI STIPULATION (SAL WITH PRE	OF VOLUNTARY
12	Plaintiff,			
13	v.			
14 15 16 17	NATIONAL ORGANIZATION FOR THE REFORM OF MARIJUANA LAWS, a District of Columbia domestic nonprofit corporation; MEDIA AWARENESS PROJECT (MAP), INC., a Delaware non- profit corporation,			
18	Defendants.			
19 20				
20	Plaintiff, Righthaven LLC ("Righthaven") and Media Awareness Project (MAP), Inc.			
22	("MAP"; collectively with Righthaven known herein as the "Parties"), by and through counsels			
23	of record, pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, hereby stipulate to a			
24	voluntary dismissal of all claims asserted against Defendant, MAP, with prejudice, in the above-			
25	captioned matter.			
26 27				
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-				

Specifically, Righthaven requests voluntary dismissal with prejudice pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure. Rule 41(a)(2) permits voluntary dismissal with prejudice "by court order, on terms that the court considers proper¹."

On or about June 4, 2010, the Parties entered into a settlement agreement (the "Agreement"), whereby MAP shall be released from all claims of copyright infringement in the above-entitled matter, upon full compliance with the terms of the Agreement.

Righthaven further specifically requests that this Court retain jurisdiction of this matter, subsequent to dismissal, in order to enforce the terms of the Agreement.

WHEREFORE, the Parties request this Court enter an Order dismissing MAP from the above-captioned matter with prejudice.

WHEREFORE, the Parties further request this Court retain jurisdiction of the abovecaptioned matter to enforce the terms of the Agreement.

DATED this thirtieth day of June, 2010.

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE

Dated:

Submitted by:

RIGHTHAVEN LLC

/s/ J. Charles Coons J. Charles Coons, Esq. 9960 West Cheyenne Avenue, Suite 210 Las Vegas, Nevada 89129-7701 Attorney for Plaintiff

RIDDER, COSTA & JOHNSTONE LLP

/s/ Chris K. Ridder Chris K. Ridder, Esq. 12 Geary Street, Suite 701 San Francisco, California 94108 Attorney for Defendant

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Fed. R. Civ. P. 41(a)(2).