

1 SHAWN A. MANGANO, ESQ.  
Nevada Bar No. 6730  
2 [shawn@manganolaw.com](mailto:shawn@manganolaw.com)  
SHAWN A. MANGANO, LTD.  
3 9960 West Cheyenne Avenue, Suite 170  
Las Vegas, Nevada 89129-7701  
4 Tel: (702) 304-0432  
Fax: (702) 922-3851

5  
6 J. CHARLES COONS, ESQ.  
Nevada Bar No. 10553  
[ccoons@righthaven.com](mailto:ccoons@righthaven.com)  
7 *Assistant General Counsel at Righthaven LLC*  
Righthaven LLC  
8 9960 West Cheyenne Avenue, Suite 210  
Las Vegas, Nevada 89129-7701  
9 (702) 527-5900

10 *Attorneys for Plaintiff Righthaven LLC*

11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13  
14 RIGHTHAVEN LLC, a Nevada limited-  
liability company,

15  
16 Plaintiff,

17 v.

18 MAJORWAGER.COM, INC., an Ontario,  
19 Canada corporation,

20  
21 Defendant.

Case No.: 2:10-cv-0484-GMN-LRL

**JOINT STIPULATION AND [PROPOSED]  
ORDER FOR VOLUNTARY DISMISSAL  
WITH PREJUDICE AND WITHOUT  
ATTORNEY FEES OR COSTS  
AWARDED TO ANY PARTY**

22  
23 Plaintiff, Righthaven LLC (“Righthaven”) and Defendant, MajorWager (“MajorWager”;  
24 collectively with Righthaven known herein as the “Parties”), pursuant to Rule 41(a)(2) of the  
25 Federal Rules of Civil Procedure, hereby notify the Court that they have resolved their  
26 differences and hereby stipulate to a voluntary dismissal, with prejudice, of all claims asserted  
27 against MajorWager and Russ Hawkins in the above-captioned matter and without costs or  
28 attorneys’ fees awarded to any party.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

WHEREFORE, the Parties respectfully request this Court enter an Order dismissing the above-captioned action filed against MajorWager with prejudice.

Dated this twelfth day of January, 2011.

**IT IS SO ORDERED.**

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

Dated: \_\_\_\_\_

Submitted by:

RIGHTHAVEN LLC

\_\_\_\_\_  
/s/ J. Charles Coons  
J. Charles Coons, Esq.  
9660 West Cheyenne Avenue, Suite 210  
Las Vegas, Nevada 89129-7701  
*Attorneys for Plaintiff Righthaven LLC*

LEWIS AND ROCA LLP

\_\_\_\_\_  
/s/Jonathan W. Fountain  
Michael J. McCue, Esq.  
Jonathan W. Fountain, Esq.  
3993 Howard Hughes Pkwy., Suite 600  
Las Vegas, Nevada 89169  
*Attorneys for Defendant Majorwager*