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7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**  
9

10 RIGHTHAVEN LLC, a Nevada limited-  
liability company,  
11

12 Plaintiff,  
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14 v.

15 REAL MONEY SPORTS, INC., a Florida for-  
profit corporation; and ADAM H. MEYER, an  
individual,  
16

17 Defendant.  
18

Case No.: 2:10-cv-00734

**COMPLAINT AND DEMAND  
FOR JURY TRIAL**

19  
20 Righthaven LLC (“Righthaven”) complains as follows against Real Money Sports, Inc.  
21 (“Real Money”) and Adam H. Meyer (“Mr. Meyer;” collectively with Real Money known herein  
22 as the “Defendants”) on information and belief:  
23

24 **NATURE OF ACTION**

25 1. This is an action for copyright infringement pursuant to 17 U.S.C. §501.  
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27  
28

**PARTIES**

1  
2 2. Righthaven is, and has been at all times relevant to this lawsuit, a Nevada limited-  
3 liability company with its principal place of business in Nevada.

4 3. Righthaven is, and has been at all times relevant to this lawsuit, in good standing  
5 with the Nevada Secretary of State.

6 4. Real Money is, and has been at all times relevant to this lawsuit, a for-profit  
7 corporation with its principal place of business in Florida.

8 5. Mr. Meyer is, and has been at all times relevant to this lawsuit, identified as the  
9 president and chief executive officer of Real Money.

10 6. Real Money is, and has been at all times relevant to this lawsuit, identified as the  
11 owner of the Internet domain found at <adamwins.com> (the “Domain”).

12 7. Real Money is, and has been at all times relevant to this lawsuit, in administrative  
13 control of the content accessible through [www.adamwins.com](http://www.adamwins.com) (the content accessible through  
14 the Domain and the Domain itself, collectively known herein as the “Website”).

15  
16 **JURISDICTION**

17 8. This Court has original subject matter jurisdiction over this copyright  
18 infringement action pursuant to 28 U.S.C. §1331 and 28 U.S.C. §1338(a).

19 9. Real Money purposefully directs activities at Nevada residents, which activities  
20 have resulted in the copyright infringement alleged herein.

21 10. Mr. Meyer purposefully directs activities at Nevada residents, which activities  
22 have resulted in the copyright infringement alleged herein.

23 11. Righthaven is the copyright owner of the literary work entitled “\$1 million wager  
24 on game approved” (the “Work”), attached hereto as Exhibit 1.

25 12. The Defendants copied, on an unauthorized basis, a significant and substantial  
26 portion of the Work from a source emanating from Nevada.

1           13. On or about February 7, 2010, the Defendants displayed and continue to display,  
2 an unauthorized version of the Work (the “Infringement”), attached hereto as Exhibit 2, on the  
3 Website.

4           14. The Defendants’ display of the Infringement was and is purposefully directed at  
5 Nevada residents.

6           15. The Defendants purposefully direct and effectuate the unauthorized reproduction  
7 of a Righthaven-owned copyrighted work at the Website.

8           16. The Defendants’ unauthorized reproduction of a Righthaven-owned copyrighted  
9 work found on the Website was and is purposefully targeted to Nevada residents.

10          17. The Defendants’ contacts with Nevada are systematic and continuous because the  
11 Defendants publish, on the Website, content emanating from Nevada, originally published in  
12 Nevada daily newspapers.

13          18. Mr. Meyer’s contacts with Nevada are systematic and continuous because the  
14 Website advertises that Mr. Meyer is the “biggest star in Las Vegas.”

15          19. Mr. Meyer’s contacts with Nevada are systematic and continuous because the  
16 Website displays a Las Vegas, Nevada local television news video segment where Mr. Meyer  
17 was interviewed and claimed that Mr. Meyer has been “out here,” alluding to Las Vegas,  
18 Nevada, for “two decades.”

19  
20   **VENUE**

21          20. The United States District Court for the District of Nevada is an appropriate  
22 venue, pursuant to 28 U.S.C. §1391(b)(2), because a substantial part of the events giving rise to  
23 the claim for relief are situated in Nevada.

24          21. The United States District Court for the District of Nevada is an appropriate  
25 venue, pursuant to 28 U.S.C. §1391(b)(3) and §1400(a), because Mr. Meyer may be found in  
26 Nevada.  
27  
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1           34.     The Defendants did not seek permission, in any manner, to reproduce, display, or  
2 otherwise exploit the Work.

3           35.     The Defendants were not granted permission, in any manner, to reproduce,  
4 display, or otherwise exploit the Work.

5  
6                                   **CLAIM FOR RELIEF: COPYRIGHT INFRINGEMENT**

7           36.     Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
8 35 above.

9           37.     Righthaven holds the exclusive right to reproduce the Work, pursuant to 17  
10 U.S.C. §106(1).

11           38.     Righthaven holds the exclusive right to prepare derivative works based upon the  
12 Work, pursuant to 17 U.S.C. §106(2).

13           39.     Righthaven holds the exclusive right to distribute copies of the Work, pursuant to  
14 17 U.S.C. §106(3).

15           40.     Righthaven holds the exclusive right to publicly display the Work, pursuant to 17  
16 U.S.C. §106(5).

17           41.     The Defendants reproduced the Work, in derogation of Righthaven's exclusive  
18 rights under 17 U.S.C. §106(1).

19           42.     The Defendants created an unauthorized derivative of the Work, in derogation of  
20 Righthaven's exclusive rights under 17 U.S.C. §106(2).

21           43.     The Defendants distribute unauthorized reproductions of the Work, via the  
22 Website, in derogation of Righthaven's exclusive rights under 17 U.S.C. §106(3).

23           44.     The Defendants publicly displayed and continue to displays an unauthorized  
24 reproduction of the Work at the Website, in derogation of Righthaven's exclusive rights under 17  
25 U.S.C. §106(5).

26           45.     Real Money has willfully engaged in the copyright infringement of the Work.

27           46.     Mr. Meyer has willfully engaged in the copyright infringement of the Work.  
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1 47. The Defendants' acts as alleged herein, and the ongoing direct results of those  
2 acts, have caused and will continue to cause irreparable harm to Righthaven in an amount  
3 Righthaven cannot ascertain, leaving Righthaven with no adequate remedy at law.

4 48. Unless the Defendants are preliminarily and permanently enjoined from further  
5 infringement of the Work, Righthaven will be irreparably harmed, and Righthaven is thus  
6 entitled to preliminary and permanent injunctive relief against further infringement by the  
7 Defendants of the Work, pursuant to 17 U.S.C. §502.

8  
9 **PRAYER FOR RELIEF**

10 Righthaven requests that this Court grant Righthaven's claim for relief herein as follows:

11 1. Preliminarily and permanently enjoin and restrain the Defendants, and the  
12 Defendants' officers, agents, servants, employees, attorneys, parents, subsidiaries, related  
13 companies, partners, and all persons acting for, by, with, through, or under Real Money or Mr.  
14 Meyer, from directly or indirectly infringing the Work by reproducing the Work, preparing  
15 derivative works based on the Work, distributing the Work to the public, and/or displaying the  
16 Work, or ordering, directing, participating in, or assisting in any such activity;

17 2. Direct the Defendants to preserve, retain, and deliver to Righthaven in hard copies  
18 or electronic copies:

19 a. All evidence and documentation relating in any way to the Defendants'  
20 use of the Work, in any form, including, without limitation, all such evidence and  
21 documentation relating to the Website;

22 b. All evidence and documentation relating to the names and addresses  
23 (whether electronic mail addresses or otherwise) of any person with whom the  
24 Defendants have communicated regarding the Defendants' use of the Work; and

25 c. All financial evidence and documentation relating to the Defendants' use  
26 of the Work;

27 3. Direct GoDaddy.com Inc., and any successor domain name registrar for the  
28 Domain to lock the Domain and transfer control of the Domain to Righthaven;

1 4. Award Righthaven statutory damages for the willful infringement of the Work,  
2 pursuant to 17 U.S.C. §504(c);

3 5. Award Righthaven pre- and post-judgment interest in accordance with applicable  
4 law; and

5 6. Grant Righthaven such other relief as this Court deems appropriate.  
6

7 **DEMAND FOR JURY TRIAL**

8 Righthaven requests a trial by jury pursuant to Fed.R.Civ.P. 38.

9 Dated this nineteenth day of May, 2010.  
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11 RIGHTHAVEN LLC

12 By: /s/ J. Charles Coons  
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