

1 SHAWN A. MANGANO, ESQ.
Nevada Bar No. 6730
2 shawn@manganolaw.com
SHAWN A. MANGANO, LTD.
3 9960 West Cheyenne Avenue, Suite 170
Las Vegas, Nevada 89129-7701
4 (702) 683-4788 – telephone
(702) 922-3851 – facsimile

5
6 J. CHARLES COONS, ESQ.
Nevada Bar No. 10553
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
12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

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

16 Plaintiff,

17 v.

18
19 EMTCITY.COM, an entity of unknown origin
and nature; and CHRISTOPHER J. MALLEY,
an individual,

20
21 Defendants.

Case No.: 2:10-cv-0854-HDM-PAL

**DECLARATION OF SHAWN A.
MANGANO, ESQ. IN SUPPORT OF
PLAINTIFF’S OPPOSITION TO
DEFENDANTS’ RENEWED MOTION TO
DISMISS**

22
23 Shawn A. Mangano, Esq., being duly sworn, deposes and says:

24 1. I am counsel of record for Righthaven LLC (“Righthaven”) in the above-
25 referenced matter, and I have personal knowledge of the facts set forth herein and I am
26 competent to testify thereto and could and would so testify under oath if called to do so.
27
28

1 2. This declaration is made in support of Plaintiff's Opposition to Defendants'
2 Renewed Motion to Dismiss.

3 3. Attached hereto as Exhibit "1" is a true and correct copy of the October 20, 2010
4 hearing transcript on Defendants' Motion to Dismiss (Doc. # 8) in this action.

5 4. Defendants have engaged in no discovery during the 45-day period authorized by
6 the Court prior to being able to renew their Motion to Dismiss.

7 I declare under penalty of perjury that the foregoing is true and correct to the best of my
8 knowledge.

9 Dated this 3rd day of January, 2011

10
11 By: /s/ Shawn A. Mangano
 SHAWN A. MANGANO, ESQ.

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

EXHIBIT “1”