

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 Tel: (702) 304-0432
Fax: (702) 922-3851

5 *Attorney for Plaintiff Righthaven LLC*
6

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

10 RIGHTHAVEN LLC, a Nevada limited-
liability company,

11
12 Plaintiff,

13 v.

14 NO QUARTER, an entity of unknown origin
and nature; and LARRY C. JOHNSON, an
15 individual,
16

17 Defendants.
18

Case No.: 2:10-cv-01022-JCM-GWF

19 **STIPULATION AND ORDER FOR**
EXTENSION OF TIME TO RESPOND TO
DEFENDANT LARRY C. JOHNSON'S
MOTION TO DISMISS AND CONSENT
TO SET ASIDE DEFAULT

20 **(FIFTH REQUEST)**

21 IT IS HEREBY STIPULATED BETWEEN Righthaven LLC ("Righthaven"), by and
through its counsel of record, and Defendant Larry C. Johnson ("Defendant"), by and through his
22 counsel of record, that Righthaven's Response to Defendant's Motion to Dismiss (Doc. # 16, 18)
23 shall now be due as follows: (1) Righthaven's response to Defendant's Motion Dismiss is to be
24 filed on or before **April, 29, 2011**; and Defendant's reply to Righthaven's response shall be filed
25 on or before **May 13, 2011**.

26 This stipulation and order is entered into between Righthaven and Defendant because the
27 parties have reached agreement on various material terms to settle these proceedings have
28

1 reduced their understanding to writing via a draft settlement agreement. This draft settlement
2 agreement is now under review by the parties and their counsel. The parties wish to relieve the
3 Court of the burden associated with unnecessary filings in this action in view of the fact that
4 Righthaven's response and Defendant's reply submissions would be rendered moot given the
5 fact that they are on the verge of settling this dispute. The time periods requested by this
6 stipulation should provide the parties with sufficient time review and finalize a settlement
7 agreement or, should for some unforeseen and unlikely reason a settlement is not formally
8 reduced to writing, provide them with adequate time to file appropriate responses in connection
9 with Defendant's Motion to Dismiss. This stipulation is sought in good faith and not for purposes
10 of delay.

11 Dated this 12th day of April, 2011.

12 WOODS ERICKSON WHITAKER
13 & MAURICE LLP

SHAWN A. MANGANO, LTD.

14 By: /s/ Jason M. Wiley
15 JASON M. WILEY, ESQ.
16 Nevada Bar No. 9274
17 jwiley@woodserickson.com
18 1349 W. Galleria Drive, #200
19 Henderson, Nevada 89014

By: /s/ Shawn A. Mangano
SHAWN A. MANGANO, ESQ.
Nevada Bar No. 6730
shawn@manganolaw.com
9960 West Cheyenne Avenue, Suite 170
Las Vegas, Nevada 89129-7701

Attorneys for Defendant

Attorney for Righthaven LLC

20
21 **IT IS SO ORDERED:**

22 
23 _____
24 **UNITED STATES DISTRICT COURT JUDGE**

25 **DATED:** April 15, 2011
26 _____
27
28