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

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

13 Plaintiff,

14 v.

15 HOWARD HEYS, an individual;

16 Defendant.
17

Case No.: 2:10-cv-01110

**COMPLAINT AND DEMAND
FOR JURY TRIAL**

18
19 Righthaven LLC (“Righthaven”) complains as follows against Howard Heys (“Mr.
20 Heys”) on information and belief:

21
22 **NATURE OF ACTION**

- 23 1. This is an action for copyright infringement pursuant to 17 U.S.C. § 501.
24

25 **PARTIES**

- 26 2. Righthaven is, and has been at all times relevant to this lawsuit, a Nevada limited-
27 liability company with its principal place of business in Nevada.
28

1 c. All financial evidence and documentation relating to Mr. Heys's use of the
2 Work;

3 3. Direct GoDaddy and any successor domain name registrar for the Domain to lock
4 the Domain and transfer control of the Domain to Righthaven;

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

7 5. Award Righthaven costs, disbursements, and attorneys' fees incurred by
8 Righthaven in bringing this action, pursuant to 17 U.S.C. § 505;

9 6. Award Righthaven pre- and post-judgment interest in accordance with applicable
10 law; and

11 7. Grant Righthaven such other relief as this Court deems appropriate.

12
13 **DEMAND FOR JURY TRIAL**

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

15 Dated this seventh day of July, 2010.

16
17 RIGHTHAVEN LLC

18
19 By: /s/ J. Charles Coons
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