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 15 DEMOCRATIC UNDERGROUND, LLC, and
 Defendant DAVID ALLEN

16 **UNITED STATES DISTRICT COURT**
 17 **FOR THE DISTRICT OF NEVADA**

18 RIGHTHAVEN LLC, a Nevada limited liability company,
 19 Plaintiff,
 20 v.
 21 DEMOCRATIC UNDERGROUND, LLC, a District of
 Columbia limited-liability company; and DAVID ALLEN,
 an individual,
 22 Defendants.

23 DEMOCRATIC UNDERGROUND, LLC, a District of
 Columbia limited-liability company,
 24 Counterclaimant,
 25 v.
 26 RIGHTHAVEN LLC, a Nevada limited liability company,
 and STEPHENS MEDIA LLC, a Nevada limited-liability
 27 company,
 28 Counterdefendants.

Case No. 10-01356-RLH (GWF)

**[PROPOSED] ORDER
 GRANTING DEFENDANTS'
 CONDITIONAL MOTION TO
 FILE DOCUMENTS UNDER
 SEAL**

1 The Court having considered Defendants' Conditional Motion To File Documents Under
2 Seal, and good cause appearing therefore,

3 **IT IS HEREBY ORDERED:**

4 1) That the following documents be filed under seal at this time: (i) Defendants'
5 Motion for Leave to File Supplemental Memorandum Addressing Recently Produced Evidence
6 Relevant to Pending Motions, (ii) Defendants' Supplemental Memorandum Addressing Recently
7 Produced Evidence Relevant To Pending Motions, (iii) Declaration of Laurence Pulgram, and (iv)
8 Exhibit A to Declaration of Laurence Pulgram.

9 2) That within fourteen (14) days of the date of this Order, (i) the parties shall file a
10 stipulation as to which portions of said Exhibit A and the Supplemental Memorandum shall
11 remain under seal or, (ii) if no stipulation is reached by the parties, Counterdefendants Stephens
12 Media, LLC and Righthaven, LLC shall file with the Court their justification for retaining Exhibit
13 A under seal, with any Reply thereto by Defendants to be filed within seven days thereafter.

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Dated: _____

The Honorable ROGER L. HUNT
United States District Judge