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8 Attorneys for Defendant
9 ANDREW STODDARD,
10 an individual

11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 RIGHTHAVEN, LLC, a Nevada Limited
14 Liability Company,

15 Plaintiff,

16 v.

17 HUSH-HUSH ENTERTAINMENT, INC.,
18 a suspended California Corporation; PN
19 MEDIA, INC., a California Company;
20 ANDREW STODDARD, an individual,

21 Defendants.

CASE NO. 2:10-cv-01404-LRH-LRL

**DEFENDANT ANDREW
STODDARD’S EVIDENTIARY
OBJECTIONS TO OPPOSITION TO
MOTION TO DISMISS PLAINTIFF’S
FIRST AMENDED COMPLAINT**

22 Defendant ANDREW STODDARD (“Defendant” or “Stoddard”) by and through its
23 counsel of record, Ecoff, Blut & Salomons, LLP, hereby submits his Evidentiary Objection to
24 Plaintiff’s Opposition to his Motion to Dismiss Plaintiff’s First Amended Complaint.

25 DATED: April 18, 2011

ECOFF, BLUT & SALOMONS, LLP

26 By: _____ //s//

27 ELLIOT S. BLUT, ESQ.
28 Attorneys For Defendant
ANDREW STODDARD

EVIDENTIARY OBJECTIONS

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1. Declaration of Shawn A. Mangano., Paragraph 4, lines 10-11; Exhibit “1”:
“Attached hereto as Exhibit ‘1’ is a true and correct copy of a print out from
Wikipedia relating to Hush Hush Entertainment.”

Grounds for Objection: Relevance (*Federal Rules of Evidence* 401, 402);
Hearsay (*Federal Rules of Evidence* 801, 802); Lack of Foundation (*Federal Rule
of Evidence* 901).

Court’s Ruling on Objection: Sustained: _____
Overruled: _____

2. Declaration of Shawn A. Mangano., Paragraph 5, lines 12-14; Exhibit “2”:
“Attached hereto as Exhibit ‘2’ is a true and correct copy of a print out of an
article posted on P2P Blog entitled ‘Porn industry debates P2P lawsuits, fights
about advertising on torrent sites.’”

Grounds for Objection: Relevance (*Federal Rules of Evidence* 401, 402);
Hearsay (*Federal Rules of Evidence* 801, 802); Lack of Foundation (*Federal Rule
of Evidence* 901); Lack Of Personal Knowledge; (*Federal Rules of Evidence* 602).

Court’s Ruling on Objection: Sustained: _____
Overruled: _____

3. Declaration of Shawn A. Mangano., Paragraph 6, lines 15-17; Exhibit “3”:
“Attached hereto as Exhibit ‘3’ is a true and correct copy of a print out of a news
release located on The PAK Group, LLC’s website entitled ‘XHC Privacy Panel:
Fight For Your IP Rights’.”

Grounds for Objection: Relevance (*Federal Rules of Evidence* 401, 402);
Hearsay (*Federal Rules of Evidence* 801, 802); Lack of Foundation (*Federal Rule
of Evidence* 901); Lack Of Personal Knowledge; (*Federal Rules of Evidence* 602).

Court’s Ruling on Objection: Sustained: _____
Overruled: _____

DATED: April 18, 2011

Respectfully submitted,
ECOFF, BLUT & SALOMONS, LLP

By: //s//
ELLIOT S. BLUT, ESQ.
Attorney for Defendant
ANDREW STODDARD

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