

1 LAURENCE F. PULGRAM (CSB No. 115163)  
2 [lpulgram@fenwick.com](mailto:lpulgram@fenwick.com)  
3 FENWICK & WEST LLP  
4 555 California Street, 12th Floor  
5 San Francisco, CA 94104  
6 Telephone: 415.875.2300  
7 Facsimile: 415.281.1350

8 CHAD BOWERS (NV State Bar No. 7283)  
9 [bowers@lawyer.com](mailto:bowers@lawyer.com)  
10 LAW OFFICES OF CHAD A. BOWERS  
11 3202 West Charleston Boulevard  
12 Las Vegas, Nevada 89102  
13 Telephone: (702) 457-1001

14 Attorneys for Amicus Curiae  
15 Democratic Underground, LLC

16 UNITED STATES DISTRICT COURT  
17 FOR THE DISTRICT OF NEVADA

FENWICK & WEST LLP  
ATTORNEYS AT LAW  
SAN FRANCISCO

18 RIGHTHAVEN LLC, a Nevada limited liability  
19 company,

20 Plaintiff,

21 v.

22 PAHRUMP LIFE, an entity of unknown origin  
23 and nature; MAREN SCACCIA, an individual;  
24 and MICHAEL SCACCIA, an individual,

25 Defendants.

Case No. 2:10-cv-01575-JCM (PAL)

**DECLARATION OF CLIFFORD  
WEBB IN SUPPORT OF AMICI'S  
RESPONSE TO PLAINTIFF  
RIGHTHAVEN LLC'S  
SUPPLEMENTAL MEMORANDUM IN  
SUPPORT OF ITS MOTION FOR  
LEAVE TO FILE AN AMENDED  
COMPLAINT [DKT. NO. 57], AND  
RESPONSE TO COURT ORDER TO  
SHOW CAUSE [DKT. NO. 21]**

FENWICK & WEST LLP  
ATTORNEYS AT LAW  
SAN FRANCISCO

1 I, Clifford Webb, declare as follows:

2 1. I am an attorney admitted to practice in the State of California, and I am an  
3 associate at the law firm of Fenwick & West LLP, counsel for Amicus Democratic Underground  
4 LLC (“Democratic Underground”). I have personal knowledge of the facts stated in this  
5 declaration, and if called upon to do so, could and would competently to the same.

6 2. On July 14, 2011, Chief Judge Hunt held a hearing in the matter of *Righthaven,*  
7 *LLC v. Democratic Underground*, No. 2:10-cv-01356-RLH-GWF on the Court’s Order to Show  
8 Cause why Righthaven, LLC (“Righthaven”) should not be sanctioned for failing to disclose  
9 Stephens Media LLC’s (“Stephens Media”) direct financial interest in its hundreds of litigation  
10 filed in this district. Counsel for Democratic Underground, Laurence Pulgram and Kurt Opsahl  
11 appeared at that hearing, as did counsel for Righthaven and Stephens Media.

12 3. As part of Judge Hunt’s oral order at that hearing, Righthaven is to file a copy of  
13 the transcript including the Court’s oral ruling in each of the cases it has filed in this district. No  
14 such transcript has yet been filed by Righthaven in this action. Accordingly, Democratic  
15 Underground attaches as **Exhibit 1** a true and correct copy of an excerpt of that transcript for  
16 consideration in relation to its response to this Court’s Order to Show cause why Righthaven’s  
17 case should not be dismissed for lack of standing.

18 I declare under penalty of perjury under the laws of the United States that the foregoing is  
19 true and correct. Executed on July 20, 2011, in San Francisco, California.

20  
21 /s/ Clifford Webb  
Clifford Webb

**ATTORNEY ATTESTATION**

In accordance with the Court’s Special Order No. 109, dated September 30, 2005, I hereby attest that concurrence in the filing of this document has been obtained from the signatories indicated by a “conformed” signature (/s/) within this e-filed document:

/s/ Laurence Pulgram  
Laurence Pulgram

FENWICK & WEST LLP  
ATTORNEYS AT LAW  
SAN FRANCISCO

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