

Michael Alan Leon
5767 Monticello Way
Fitchburg, WI 53719

United States District Court
RE: Case No.: 2:10-cv-01672
Lance S. Wilson, Deputy Clerk
District of Nevada
333 S. Las Vegas Blvd.
Las Vegas, NV 89101

April 14, 2011

United States District Court,

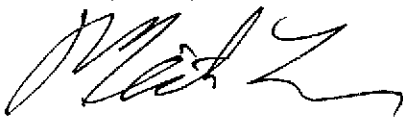
I preface with an apology to the Court [and attorney Shawn Mangano] for errors in form or style [such as repetition], as I am responding *pro se*.

Responding *pro se* to summons (and complaint) in a civil action [*Righthaven LLC v. Michael Leon*; Civil Action No 2:10-CV-01672-GMM-LRN; (Case No.: 2:10-cv-01672)] received Sunday evening, March 6, 2011 at my home.

Leon requests to add text in attached motion as supplement to motion made week of April 11, 2011. If your honor requires a hearing on this motion, I ask that the motion be conducted by phone as I do not have the financial resources to travel to Nevada, and Plaintiff is resisting negotiations to settle.

And I conclude again with my sincere apology to the Court [and attorney Shawn Mangano] for errors in form or style as I am responding *pro se*.

Very Truly Yours,



Michael Leon

Cc
Shawn Mangano, Esq.
Shawn A. Mangano, Ltd
9960 West Cheyenne Avenue, Ste 170
Las Vegas, Nevada 89129-7701
United States of America

Encs.

UNITED STATES OF AMERICA
DISTRICT OF NEVADA

Righthaven LLC v. Michael Leon; Civil Action No 2:10-CV-01672-GMM-LRN; (Case No.: 2:10-cv-01672)

MOTION TO DISMISS

Comes now Michael Leon, *pro se*, and moves this Honorable Court to dismiss this action against him and states as grounds therefore as follows:

)
Plaintiff) MOTION TO DISMISS
)
V.)
)
MICHAEL LEON, et al.)
)
Defendants)

Two Venues and Rule 11 violation

With respect to Venue as 17, Plaintiff argues in No 2:10-CV-01672-GMM-LRN filed 11/24/2010 [Complaint **not** served upon Leon]: "The **United State District Court for the Southern District of California** is an appropriate venue, pursuant to U.S.C. 28 §139(b)(2), because a substantial part of the events giving rise to the claim for relief are situated in California."

In the complaint served upon Leon the identical language is used to justify Nevada as a Venue, filed 09/27/2010. Vis: "**The United State District Court for the District Court of Nevada** is an appropriate venue, pursuant to U.S.C. 28 §139(b)(2), because a substantial part of the events giving rise to the claim for relief are situated in Nevada." – Complaint Served upon Leon.

I think plaintiff is being much less than "diligent about the facts," and I am close to filing complaint arguing a **Rule 11 violation**, calling and e-mailing plaintiff some 12 twelve times to this date.

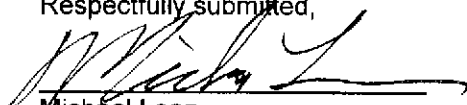
Accordingly, Leon respectfully requests that this action be dismissed.

I plead with the Court to dismiss this claim.

WHEREFORE, Michael Leon, *pro se*, prays that he be dismissed as a defendant in the above-styled case.

Points and Authorities
Fed. R. Civ. Pro. Rule 4(m)

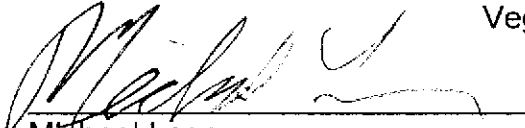
Respectfully submitted,



Michael Leon
Pro Se
5767 Monticello Way
Fitchburg, WI 53719

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I have mailed a copy of the foregoing Motion to Dismiss by first class mail postage prepaid this 14 day of April 2011 to Shawn A. Mangano, Esq, Joseph C. Chu, Esq., Righthaven LLC, 9960 West Cheyenne Ave., Suite 210, Las Vegas, NV 89129-7701.



Michael Leon