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9 *Attorney for Righthaven LLC*

10  
11 **UNITED STATES DISTRICT COURT**  
12  
13 **DISTRICT OF NEVADA**

14 RIGHTHAVEN LLC, a Nevada limited-  
15 liability company,

16 Plaintiff,

17 v.

18 MICHAEL LEON, an individual; DENISE  
19 NICHOLS, an individual; and MEDBILLZ,  
20 INC., a corporation of unknown origin,

21 Defendants.

Case No.: 2:10-cv-01672-GMN-LRL

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO CONTINUE  
SETTLEMENT DISCUSSIONS WITH  
DEFENDANT DENISE NICHOLS**

**(FIRST REQUEST)**

22 IT IS HEREBY STIPULATED BETWEEN Righthaven LLC (“Righthaven”), by and  
23 through its counsel of record, and Defendant Denise Nichols (“Nichols”), by and through her  
24 counsel of record, that the Wednesday, April 27, 2011 for electing whether or not Righthaven’s  
25 claims against Nichols should be dismissed with or without prejudice set by the Court at the  
26 April 20, 2011 hearing in this matter (Doc. # 30). The Court further advised that it would be  
27 inclined to extend this deadline should the parties’ counsel so request in view of ongoing  
28 substantive and productive settlement discussions between the parties.

Righthaven and Nichols, through their respective counsel have engaged in and are  
currently engaged in substantive and meaningful settlement discussions. However, it is unlikely

1 that a formal resolution will be finalized by the deadline set at the April 20, 2011 hearing.  
2 Accordingly, the parties stipulated to and agree that they shall have an extension of time until  
3 May 6, 2011 to finalize a settlement of the claims asserted against Nichols. This stipulation is  
4 sought in good faith and not for purposes of delay. Moreover, the Court invited counsel for  
5 Righthaven and Nichols to submit this stipulation in the event a formal resolution could not be  
6 reached by the April 27, 2011 deadline set by the Court.

7 Dated this 27<sup>th</sup> day of April, 2011.


8 MICHAEL P. KIMBRELL, LTD.

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19 **IT IS SO ORDERED** this 28th day of April, 2011.

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Gloria M. Navarro  
United States District Judge