SHAWN A. MANGANO, ESO. Nevada Bar No. 6730 shawn@manganolaw.com SHAWN A. MANGANO, LTD. 9960 West Chevenne Avenue, Suite 170 Las Vegas, Nevada 89129-7701 (702) 304-0432 – telephone (702) 922-3851 – facsimile

Attorney for Plaintiff Righthaven LLC

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

RIGHTHAVEN LLC, a Nevada limitedliability company,

Plaintiff,

V.

VIRGINIA CITIZENS DEFENSE LEAGUE, INC., a Virginia domestic corporation; PHILIP VAN CLEAVE, an individual; and JIM SNYDER, an individual,

Defendants.

Case No.: 2:10-cv-01683-GMN-PAL

STIPULATION AND ORDER FOR **EXTENSION OF TIME FOR PLAINTIFF** RIGHTHAVEN LLC TO RESPOND TO **DEFENDANTS' MOTION TO DISMISS** FOR LACK OF SUBJECT MATTER **JURISDICTION**

(FIRST REQUEST)

IT IS HEREBY STIPULATED BETWEEN Righthaven LLC ("Righthaven"), by and through its counsel of record, and Defendants Virginia Citizens Defense League, Inc., Philip Van Cleave, and Jim Snyder (collectively the "Defendants"), by and through their counsel of record, that Righthaven shall have up to and including Friday, July 22, 2011 to file its response to Defendants' Motion to Dismiss for Lack of Subject Matter Jurisdiction (Doc. #27). Defendants shall have an additional four (4) days from the time period permitted under the standard briefing schedule set forth in the Local Rules of Civil Practice to file their reply to Righthaven's response.

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This stipulation is sought in good faith and not for purposes of delay. It is entered into as 1 an accommodation to Righthaven's counsel's schedule, which is having to prepare multiple 2 responsive filings in other pending actions and attend to other client matters. 3 Dated this 18th day of July, 2011. 4 5 DAN M. PETERSON PLLC SHAWN A. MANGANO, LTD. 6 7 By: /s/ Dan M. Peterson By: /s/ Shawn A. Mangano Dan M. Peterson, Esq. (Pro Hac Vice) Shawn A. Mangano, Esq. 8 dan@danpetersonlaw.com Nevada Bar No. 6730 shawn@manganolaw.com 9960 West Cheyenne Avenue, Suite 170 3925 Chain Bridge Road, Suite 403 9 Fairfax, Virginia 22030 10 Las Vegas, Nevada 89129-7701 11 Richard E. Gardiner, Esq. (Pro Hac Vice) Attorney for Plaintiff regardiner@cox.net 12 3925 Chain Bridge Road, Suite 403 Fairfax, Virginia 22030 13 and 14 PARSONS, BEHLE & LATIMER Robert W. DeLong, Esq. Nevada Bar No. 10022 15 rdelong@parsonsbehle.com 16 50 W. Liberty Street, Suite 750 Reno, Nevada 89501 17 18 Attorneys for Defendants 19 IT IS SO ORDERED: 20 21 UNITED STATES DISTRICT COURT JUDGE 22 23 24 25 26 27 28