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5 *Attorneys for Plaintiff Righthaven LLC*

6  
7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**  
9

10 RIGHTHAVEN LLC, a Nevada limited-  
11 liability company,

12 Plaintiff,

13 v.

14 GARRY NEWMAN, an individual; and  
15 FACEPUNCH STUDIOS LTD., a limited  
16 company formed under the laws of Great  
Britain,

17 Defendants.  
18  
19

Case No.: 2:10-cv-01762-JCM-PAL

**PLAINTIFF RIGHTHAVEN LLC’S  
MOTION FOR EXTENSION OF TIME  
TO RESPOND TO DEFENDANT GARRY  
NEWMAN’S MOTION TO DISMISS THE  
FIRST AMENDED COMPLAINT FOR  
LACK OF SUBJECT MATTER  
JURISDICTION AND LACK OF  
PERSONAL JURISDICTION**

**(FIRST REQUEST)**

20 Righthaven LLC (“Righthaven”) hereby moves the Court for an extension of time to  
21 respond to Defendant Garry Newman’s (“Defendant”) Motion to Dismiss the First Amended  
22 Complaint for Lack of Subject Matter Jurisdiction and Lack of Jurisdiction (Doc. # 25, the  
23 “Motion”).

24 Righthaven requests an extension of time until Friday, August 19, 2011 to file a response  
25 to Defendant’s Motion. This is Righthaven’s first requested extension of time related to its  
26 response to the Motion. Righthaven’s counsel requests this extension of time because of the  
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1 unexpected hospitalization of a close friend and client yesterday afternoon at Valley Hospital.  
2 This individual was admitted to the emergency room for treatment while his wife and two young  
3 children were out of town. Due to the individual's hospitalization, Righthaven's counsel was  
4 away from the office until late in the evening and then required to return to the hospital for a  
5 large portion of the day today. These unexpected events have prevented counsel from preparing  
6 a response to the Motion. Moreover, these unexpected events have prevented counsel from  
7 attempting to secure a stipulation for the requested extension of time. Righthaven consents to  
8 Defendant being give a three (3) day extension of time to file a reply to the response should this  
9 requested continuance be granted. This requested extension of time is sought in good faith and  
10 not for the purposes of delay.

11 Dated this 16<sup>th</sup> day of August, 2011.

12 SHAWN A. MANGANO, LTD.

13 By: /s/ Shawn A. Mangano, Esq. \_\_\_\_\_  
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21 *Attorney for Plaintiff Righthaven LLC*

22 IT IS SO ORDERED:

23  
24 UNITED STATES DISTRICT JUDGE  
25 DATED: \_\_\_\_\_  
26  
27  
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**CERTIFICATE OF SERVICE**

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that on this 16<sup>th</sup> day of August, 2011, I caused **PLAINTIFF RIGHTHAVEN LLC'S MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANT GARRY NEWMAN'S MOTION TO DISMISS THE FIRST AMENDED COMPLAINT FOR LACK OF SUBJECT MATTER JURISDICTION AND LACK OF PERSONAL JURISDICTION** to be served by the Court's CM/ECF system.

By: /s/ Shawn A. Mangano  
Shawn A. Mangano, Esq.  
SHAWN A. MANGANO, LTD.