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5 *Attorneys for Plaintiff Righthaven LLC*

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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**
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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.
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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**

(SECOND REQUEST)

20 Righthaven LLC (“Righthaven”) hereby moves the Court for a second extension of time
21 to 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 previously requested an extension of time until Friday, August 19, 2011 to
25 file a response to Defendant’s Motion, which was requested by counsel because of the
26 unexpected hospitalization of a close friend and client at Valley Hospital. (Doc. # 27.) As noted
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1 in the previous submission, due to the close friend and client's hospitalization, Righthaven's
2 counsel has been required to be away from his office until late in the evening and then required
3 to return to the hospital for a large portion of the following day. (Doc. # 27 at 2.) Defendant's
4 counsel did not oppose the request for an extension of time. (Doc. # 28.) The Court
5 subsequently granted the request for extension of time. (Doc. # 29.)

6 Unfortunately, counsel's friend and client remained hospitalized and under emergency
7 room care until late yesterday evening. Counsel then was asked to help assist with medical and
8 other in-home transitional needs for this individual for the remaining portion of Thursday
9 evening and until late Friday evening. In view of these events, which were unexpected, counsel
10 has diligently attempted to meet the ECF deadline for Righthaven's response pursuant to the
11 extension of time previously granted, but simply cannot do so. What actions counsel has been
12 able to perform for Righthaven and for other clients have been done late into the evening given
13 his need to help his friend and client and his family. Righthaven's counsel anticipates having a
14 response to the Motion on file likely before the Court has a chance to consider this second
15 requested extension of time, but said filing should be made no later than Monday, August 29,
16 2011.

17 As with the prior requested extension, the foregoing unexpected events have prevented
18 counsel from preparing a response to the Motion by the time set forth in the extension of time
19 entered by the Court. Moreover, these unexpected events have prevented counsel from
20 attempting to secure a stipulation for the requested extension of time because counsel has been
21 away from his office and working as best possible on a remote basis. Righthaven consents to
22 Defendant being given an additional extension of time to file a reply to the response should this
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1 requested continuance be granted. This requested extension of time is sought in good faith and
2 not for the purposes of delay.

3 Dated this 19th day of August, 2011.

4 SHAWN A. MANGANO, LTD.

5 By: /s/ Shawn A. Mangano, Esq. _____
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13 *Attorney for Plaintiff Righthaven LLC*

14 IT IS SO ORDERED:

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16 UNITED STATES DISTRICT JUDGE
17 DATED: _____
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CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that on this 19th 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 (Second Request)** to be served by the Court's CM/ECF system.

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