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

11 RIGHTHAVEN LLC, a Nevada limited-liability
 company,

13 Plaintiff,

14 v.

15 FLAGSTONE PATIO, an entity of unknown
 16 origin and nature; and ROBERT SULIMANOV,
 an individual,

18 Defendants.

Case No.: 2:10-cv-01831

**COMPLAINT AND DEMAND
 FOR JURY TRIAL**

21 Righthaven LLC (“Righthaven”) complains as follows against Flagstone Patio
 22 (“Flagstone Patio”) and Robert Sulimanov (“Mr. Sulimanov”; collectively with Flagstone Patio
 23 known herein as the “Defendants”), on information and belief:

25 **NATURE OF ACTION**

26 1. This is an action for copyright infringement pursuant to 17 U.S.C. § 501.

1 deposit copy, and the registration fee (the “Complete Application”), Service Request No. 1-
2 505823781, attached hereto as Exhibit 3.

3 22. On or about August 23, 2010, the Defendants displayed, and continue to display,
4 the Infringement on the Website.

5 23. The Defendants did not seek permission, in any manner, to reproduce, display, or
6 otherwise exploit the Work.

7 24. The Defendants were not granted permission, in any manner, to reproduce,
8 display, or otherwise exploit the Work.

9
10 **CLAIM FOR RELIEF: COPYRIGHT INFRINGEMENT**

11 25. Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through
12 24 above.

13 26. Righthaven holds the exclusive right to reproduce the Work, pursuant to 17
14 U.S.C. § 106(1).

15 27. Righthaven holds the exclusive right to prepare derivative works based upon the
16 Work, pursuant to 17 U.S.C. § 106(2).

17 28. Righthaven holds the exclusive right to distribute copies of the Work, pursuant to
18 17 U.S.C. § 106(3).

19 29. Righthaven holds the exclusive right to publicly display the Work, pursuant to 17
20 U.S.C. § 106(5).

21 30. The Defendants reproduced the Work in derogation of Righthaven’s exclusive
22 rights under 17 U.S.C. § 106(1).

23 31. The Defendants created an unauthorized derivative of the Work in derogation of
24 Righthaven’s exclusive rights under 17 U.S.C. § 106(2).

25 32. The Defendants distributed, and continue to distribute, an unauthorized
26 reproduction of the Work on the Website, in derogation of Righthaven’s exclusive rights under
27 17 U.S.C. § 106(3).

