

Exhibit 16



Lara Pearson <lara@rimonlaw.com>

Notice to Court to be filed tomorrow

Lara Pearson <lara@rimonlaw.com>

Mon, Jan 2, 2012 at 10:48 AM

To: shawn@manganolaw.com, Marc John Randazza <mjr@randazza.com>

Dear Shawn and Marc:

I hope this finds you both doing well after an enjoyable holiday weekend.

Attached please find the Notice I plan to file with the Court tomorrow. I am sending you this courtesy copy in advance with the hope that we can resolve the issues addressed therein absent judicial intervention. If we have not resolved these issues by 5:00 pm PST tomorrow, then I will go ahead and file.

Warm regards,

Lara Pearson

Rimon, PC*Chief Sustainability Officer & Partner*

Ph: 775.833.1600 | Fax: 888.842.4492

Lara@rimonlaw.com | www.rimonlaw.com[See My Bio](#) | [Schedule a Meeting With Me](#)[Read BrandGeek.net!](#) | [Join Rimon's LinkedIn Group](#)**Protecting the Brands that are Changing the World®**

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2 attachments**2012-01-02 Ntc Receiver Report.pdf**

761K

**2012-01-02 Receiver Pearson Decl.pdf**

31K



Lara Pearson <lara@rimonlaw.com>

Notice to Court to be filed tomorrow

Lara Pearson <lara@rimonlaw.com>

Mon, Jan 2, 2012 at 3:04 PM

To: mjr@randazza.com, shawn@manganolaw.com

Cc: "J. DeVoy" <jmd@randazza.com>

Hello again Gentlemen:

I'd rather not play the blame game. I want to get Shawn and Righthaven the verbiage they need to feel comfortable completing the assignments so that we can move on with auctioning them and any tangible property belonging to Righthaven. I also really don't want to bother the court for help with something we three should be able to achieve on our own, but at this point, it seems judicial intervention may be the only way to allay Shawn's concerns about what his client is transferring.

Shawn -- my 12/30/2011 correspondence suggested this language as the ownership disclaimer for the auction:

The assets being auctioned herein are being sold "as-is" without representation or warranty as to their validity or enforceability.

Is this enough for you to feel comfortable advising your client to execute the assignments? If not, please provide me with revised language and/or let me know what else you need to complete the transfers.

Thank you.

Regards,

Lara Pearson

Rimon, PC*Chief Sustainability Officer & Partner*

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