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5 *Attorney for Plaintiff Righthaven LLC*

6
7 RIGHTHAVEN LLC, a Nevada limited-
liability company,
8 Plaintiff,
9
10 v.
11 TONY CARL LOOSLE, an individual; and
TCS, INC., a Utah corporation,
12 Defendants.
13

Case No.: 2:11-cv-00627-KJD-LRL

**PLAINTIFF RIGHTHAVEN LLC’S NON-
OPPOSITION TO TEMPORARY STAY
OF PROCEEDINGS PENDING
RESOLUTION OF SUBJECT MATTER
JURISDICTION MOTIONS PENDING
BEFORE COURT**

14
15 Plaintiff Righthaven LLC (“Righthaven”) hereby files this non-opposition to Defendant
16 Tony Carl Loosle’s (“Defendant”) request to stay these proceedings (Doc. # 8) pending
17 resolution of the subject matter jurisdiction motions pending before this Court in *Righthaven*
18 *LLC v. Vote For The Worst, LLC, et al.*, Case No. 2:10-cv-01045-KJD-GWF (Doc. # 33) and in
19 *Righthaven LLC v. Mostofi*, Case No. 2:10-cv-1066-KJD-LRL (Doc. # 25), which is a virtual
20 carbon copy of the filing in the *Vote For The Worst, LLC* action. Nev. March 30, 2011). Briefly
21 staying these proceedings until the subject matter jurisdiction arguments in the two pending
22 referenced cases before this Court can be adjudicated clearly serves the interests of judicial
23 economy and avoids the need for the parties in this action to engage in duplicative briefing
24 efforts. Righthaven believes it has thoroughly and effectively established its standing to
25 maintain suit for accrued claims of copyright infringement that are the basis of the pending
26 actions before this Court. Accordingly, Righthaven does not oppose entry of a temporary stay of
27 these proceedings until the Court can decide the subject matter issues presented in the *Vote For*
28 *The Worst, LLC* and the *Mostofi* actions. To the extent the Court is unwilling to stay these

1 proceedings, Righthaven asks for an opportunity to fully address through a written submission
2 any asserted grounds for dismissing this action.

3 Dated this 25th day of May, 2011.

4 SHAWN A. MANGANO, LTD.

5 By: /s/ Shawn A. Mangano
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CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that I on this 25th day of May, 2011, I caused the foregoing document to be served by the Court’s CM/ECF system.

SHAWN A. MANGANO, LTD.

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