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5 *Attorney for Plaintiff Righthaven LLC*

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

10 RIGHTHAVEN LLC, a Nevada limited-  
liability company,

11  
12 **Plaintiff,**

13 v.

14 LAW MED CONSULTING LLC, a Maryland  
15 limited-liability company; LAW MED BLOG,  
16 an entity of unknown origin and nature; and  
GREG STOCKS, an individual,

17 **Defendants.**  
18

Case No.: 2:11-cv-00717

**COMPLAINT AND DEMAND  
FOR JURY TRIAL**

19 Righthaven LLC (“Righthaven”) complains as follows against Law Med Consulting LLC  
20 (“Law Med Consulting”), Law Med Blog (“Law Med Blog”) and Greg Stocks (“Mr. Stocks”;  
21 collectively with Law Med Consulting and Law Med Blog known herein as the “Defendants”)  
22 on information and belief, and at all times relevant to this lawsuit, unless otherwise specifically  
23 indicated herein to the contrary:  
24

25 **NATURE OF ACTION**

26 1. This is an action for copyright infringement pursuant to 17 U.S.C. § 501.  
27  
28

**PARTIES**

1  
2 2. Righthaven is a Nevada limited-liability company with its principal place of  
3 business in Nevada.

4 3. Righthaven is in good standing with the Nevada Secretary of State.

5 4. Law Med Consulting is a forfeited Maryland limited-liability company.

6 5. Mr. Stocks is identified by Mr. Stocks' LinkedIn profile, as the owner of Law  
7 Med Consulting, attached hereto as Exhibit 1.

8 6. Law Med Consulting is identified by the current registrar, GoDaddy.com  
9 ("GoDaddy"), as the registrant of the Internet domain found at <lawmedconsultant.com> (the  
10 "Domain").

11 7. Law Med Consulting is identified by GoDaddy as an administrative contact and  
12 technical contact of the Domain (the content accessible through the Domain and the Domain  
13 itself known herein as the "Website").

14 8. Mr. Stocks is identified by GoDaddy as an administrative contact and technical  
15 contact of the Domain.

16 9. Law Med Blog is an entity of unknown origin and nature.

17 10. Attempts to find evidence of the formal organizational status in the respective  
18 Secretary of State offices of Delaware, California, Illinois, Maryland, Nevada, New York, Texas  
19 and Tennessee demonstrate that, at least with respect to these states, Law Med Blog is not a  
20 formally organized business entity.

21 11. Law Med Blog is the self-proclaimed owner of the copyright(s) in the work(s)  
22 displayed on the Website, as evidenced by a copyright notice displayed on the Website: © 2011  
23 Law Med Blog. All Rights Reserved.”

24  
25 **JURISDICTION**

26 12. This Court has original subject matter jurisdiction over this copyright  
27 infringement action pursuant to 28 U.S.C. § 1331 and 28 U.S.C. § 1338(a).  
28

1 13. Righthaven is the owner of the copyright in the literary work entitled, “Lawyer  
2 presses for delay in trial of nurses connected to hepatitis C outbreak” (the “Work”), attached  
3 hereto as Exhibit 2.

4 14. On or about February 25, 2011, the Defendants displayed, and continue to  
5 display, an unauthorized reproduction of the Work (the “Infringement”), attached hereto as  
6 Exhibit 3, on the Website.

7 15. The Work has depicted and depicts the original source publication as the Las  
8 Vegas *Review-Journal*.

9 16. The Defendants willfully copied, on an unauthorized basis, the Work from a  
10 source emanating from Nevada.

11 17. The Infringement has depicted and depicts the original source publication as the  
12 Las Vegas *Review-Journal*.

13 18. The Defendants knew that the Work was originally published in the Las Vegas  
14 *Review-Journal*.

15 19. The Defendants knew that the Infringement was and is of specific interest to  
16 Nevada residents.

17 20. The Infringement, as publically displayed on the Website, was and is accessible in  
18 Nevada.

19 21. The Infringement occurred and continues to occur in Nevada.

20 22. The Defendants’ display of the Infringement was and is purposefully directed at  
21 Nevada residents.

22  
23 **VENUE**

24 23. The United States District Court for the District of Nevada is an appropriate  
25 venue, pursuant to 28 U.S.C. § 1391(b)(2), because a substantial part of the events giving rise to  
26 the claim for relief are situated in Nevada.



1 35. Righthaven holds the exclusive right to distribute copies of the Work, pursuant to  
2 17 U.S.C. § 106(3).

3 36. Righthaven holds the exclusive right to publicly display the Work, pursuant to 17  
4 U.S.C. § 106(5).

5 37. The Defendants reproduced the Work in derogation of Righthaven's exclusive  
6 rights under 17 U.S.C. § 106(1).

7 38. The Defendants created an unauthorized derivative of the Work in derogation of  
8 Righthaven's exclusive rights under 17 U.S.C. § 106(2).

9 39. The Defendants distributed, and continue to distribute, an unauthorized  
10 reproduction of the Work on the Website, in derogation of Righthaven's exclusive rights under  
11 17 U.S.C. § 106(3).

12 40. The Defendants publicly displayed, and continue to display, an unauthorized  
13 reproduction of the Work on the Website, in derogation of Righthaven's exclusive rights under  
14 17 U.S.C. § 106(5).

15 41. Law Med Consulting has willfully engaged in the copyright infringement of the  
16 Work.

17 42. Law Med Blog has willfully engaged in the copyright infringement of the Work.

18 43. Mr. Stocks has willfully engaged in the copyright infringement of the Work.

19 44. Defendants' acts as alleged herein, and the ongoing direct results of those acts,  
20 have caused and will continue to cause irreparable harm to Righthaven in an amount Righthaven  
21 cannot ascertain, leaving Righthaven with no adequate remedy at law.

22 45. Unless the Defendants are preliminarily and permanently enjoined from further  
23 infringement of the Work, Righthaven will be irreparably harmed, and Righthaven is thus  
24 entitled to preliminary and permanent injunctive relief against further infringement by the  
25 Defendants of the Work, pursuant to 17 U.S.C. § 502.

**PRAYER FOR RELIEF**

Righthaven requests that this Court grant Righthaven's claim for relief herein as follows:

1. Preliminarily and permanently enjoin and restrain the Defendants, and the Defendants' officers, agents, servants, employees, attorneys, parents, subsidiaries, related companies, partners, and all persons acting for, by, with, through, or under the Defendants, from directly or indirectly infringing the Work by reproducing the Work, preparing derivative works based on the Work, distributing the Work to the public, and/or displaying the Work, or ordering, directing, participating in, or assisting in any such activity;

2. Direct the Defendants to preserve, retain, and deliver to Righthaven in hard copies or electronic copies:

a. All evidence and documentation relating in any way to the Defendants' use of the Work, in any form, including, without limitation, all such evidence and documentation relating to the Website;

b. All evidence and documentation relating to the names and addresses (whether electronic mail addresses or otherwise) of any person with whom the Defendants have communicated regarding the Defendants' use of the Work; and

c. All financial evidence and documentation relating to the Defendants' use of the Work;

3. Order the surrender to Righthaven of all hardware, software, electronic media and domains, including the Domain used to store, disseminate and display the unauthorized versions of any and all copyrighted works as provided for under 17 U.S.C. § 505(b) and/or as authorized by Federal Rule of Civil Procedure 64;

4. Award Righthaven statutory damages for the willful infringement of the Work, pursuant to 17 U.S.C. § 504(c);

5. Award Righthaven costs, disbursements, and attorneys' fees incurred by Righthaven in bringing this action, pursuant to 17 U.S.C. § 505;

6. Award Righthaven pre- and post-judgment interest in accordance with applicable law; and

