Filed 08/22/1 Case 2:11-cv-00717-ECR -CWH Document 8 **ENTERED SERVEDION** NO COPY COUNSEL/PARTIES OF RECORD AUG 2 2 2011 1 **Gregory Stocks** 640-D North Calvert St. Baltimore, Md. 21202 2 CLERK US DISTRICT COURT (410) 913-4337 DISTRICT OF NEVADA 3 BY: DEPUTY 4 UNITED STATES DISTRICT COURT 5 DISTRICT OF NEVADA 6 7 Case No. 2:11-cv-00717-ECR -PAL Righthaven LLC 8 Plaintiff, 9 AFFIDAVIT FOR JUDICIAL NOTICE VS. OF FAILURE TO COMPLY WITH A 10 JUDICIAL ORDER Law Med Consulting LLC, The Law Med 11 Blog, and Gregory Stocks 12 Defendants 13 14 Gregory Stocks, Defendant pro per in the above entitled action, files this Affidavit to 15 inform the court of the Plaintiff's failure to comply with a judicial order, and the 16 misrepresentations by Righthaven of that failure to comply, which are such that they constitute a 17 Fraud Upon the Court. Righthaven's failure to comply has also unfairly prejudiced the 18 proceedings against the Defendants. 19 **Background For The Affidavit** 20 The instant action was filed on May 5, 2011, and the three Defendants have yet to be 21 served with the complaint. However, all of the named Defendants are in fact one in the same 22 person', the Affiant, Gregory Stocks. At the time the complaint was filed, Summons were issued 23 for three defendants: Gregory Stocks, Law Med Consulting LLC, and The Law Med Blog. Each 24 summons contains the correct, public record address for each Defendant and that address is 25 identical for each: 640-D North Calvert St., Baltimore, MD, 21202. This is Affiant's personal 26 residence and one and only address listed in all state and internet records for the other two 27 entities. 28

In a separate action, Righthaven v Democratic Underground Case 2:10-cv-01356-RLH –GWF, Judge Robert Hunt ordered Righthaven to produce certain documents to all parties who are defendants in all current Righthaven lawsuits, *including* parties who have yet to be served in cases that have been filed, and to do so by August 8, 2011. This date was an extension from an original date of July 29, when instead of meeting the deadline for compliance, Righthaven motioned the Court for a 10 day extension of time to comply citing confusion as to the requirements of the Order and being too busy.

The truth of the matter is Righthaven has made absolutely no effort or attempt to comply with Judge Hunt's Order as it pertains to the Defendants in this case. Righthaven has never attempted to mail anything to the Defendants or addresses listed in the very Summons they had issued in this case. Contrary to representations made to the Court by Righthaven, Righthaven has never attempted to serve the Defendants in this case with a Summons. The addresses listed, by Righthaven, on the Summons, are true and correct, with absolutely no impediment to daily delivery of the US mail, Certified US Mail, United Parcel Service, FedEx, or any other common document delivery agent.

In short, Righthaven has made intentional misrepresentations to the Court, which arguably constitute a Fraud Upon the Court, and Righthaven has intentionally failed to comply with the Court's Order specifically to prevent the named Defendants from receiving the documents and material information contained therein as ordered by Judge Hunt. In fact Judge Hunt was specific in his reasoning as to why Righthaven must provide the documents directly to all parties: "The Court is fully aware of Righthaven's practice of filing suit against a party and then entering settlement negotiations (and frequently settling) without ever serving the party. The Court concludes that depriving those parties of the benefit of the Court's order would be unjust." (Exhibit A)

In fact Righthaven has already been sanctioned by Judge Hunt for other "multiple" misrepresentations they have made to the Court. This is yet another, now rather predictable, underhanded attempt to get one over on the Court and the defendants in the 276 related lawsuits they have filed.

This information is being provided to the Court in the form of an Affidavit for a number of reasons. Affiant has yet to be served with the complaint in the above entitled action and is not a party in Righthaven v Democratic Underground. Affiant is submitting this Affidavit to the Clerk for filing in both cases. Should the Court wish for the information contained herein to be submitted in a different format, the affiant will be happy to do so. Affiant has chosen this format as it is unclear whether there is a more appropriate form for the Affiant to utilize in order to notify the Court of the failure to comply with an order in a case where he is a nonparty but which also applies to a case in which he is a party, but has not yet been served with the complaint.

Respectfully submitted this 16th day of August 2011

Gregory Stocks pro per 640-D North Calvert St. Baltimore, MD 21202 (410) 913-4337 admin@lawmedconsultant.com

Affidavit Submitted For Judicial Notice

I, the undersigned, Gregory Stocks, hereafter "Affiant", having first-hand knowledge of the facts stated herein, and being competent in mind and body to testify, declare and affirm that the facts stated herein are true, correct, and complete in all material fact to the best of my knowledge, information and belief, and are not misrepresented.

Affiant is a defendant in one of the 'Righthaven lawsuits', Righthaven v Law Med Consulting et al. Case 2:11-cv-00717-ECR -PAL. The action was filed on May 5 and the three defendants have yet to be served. All of the defendants are in fact one in the same person, the Affiant. At the time the complaint was filed, Summons were issued for three defendants: Gregory Stocks, Law Med Consulting LLC, and The Law Med Blog. Each summons contains the correct, public record address for each defendant and that address is identical for each: 640-D North Calvert St., Baltimore, MD, 21202. This is my personal residence AND the address listed in all state and internet records for the other two entities. (Exhibit A)

In another Righthaven case, Righthaven v Democratic Underground Case 2:10-cv-01356-RLH –GWF, the Court sanctioned Righthaven for "intentional failure to disclose" a pecuniary interest, and ordered Righthaven to produce specific documents to all parties who are defendants in current Righthaven lawsuits, including parties who have yet to be served in cases that have been filed, by August 8, 2011. (Exhibit B) The Court stated "As part of the sanction, the court is going to order that every case Righthaven has in any jurisdiction in this country must be provided with a copy of this Court's decision about the agreement, the one on standing, and the agreement be disclosed to parties that Righthaven has sued". (Transcript, Righthaven v Democratic Underground Case 2:10-cv-01356-RLH –GWF July 14, 2011 hearing on sanctions, p.17)

On August 8, 2011, Righthaven filed with the Court in the *Democratic* case a Notice of Compliance in which Righthaven states:

"Righthaven has complied with the July 14th Order as follows: ... (2) it has sent copies of the Court's dismissal for lack of standing, the SAA [the "agreement"]

Affidavit of Gregory Stocks

and the July 14, 2011 OSC hearing transcript to all addresses on file for all prose parties appearing in all currently pending actions involving Stephens Media content". (Exhibit C p.2 \P 3)

This representation to the court by Righthaven was false and intentionally misleading. Affiant is one of the pro se parties Righthaven refers to. Along with the Notice of Compliance Righthaven filed a "July 14, 2011 Order Compliance Table" listing the parties in question and the address Righthaven alleges to have on file for each. Affiant can be found listed as item 71, with the following notation as the address represented as being on file for the Affiant: "No address. Unable to serve complaint to date". (Exhibit C p.6)

As previously noted, Righthaven in fact does have Affiant's correct address on file, and has already represented to the court that they have this address on file, as well as the addresses for all of the defendants in the cause of action against the Affiant, in the form of a May 6 Summons filed with the Clerk. (Exhibit A) Despite clearly being in possession of a correct address, Righthaven failed to comply with the Order to provide the documents and instead falsely represented to the Court that they had no known addresses on file, leading to an inability to comply, and further falsely represented that the service of the complaint could not take place due to a lack of address.

When one looks at all of the lawsuits filed in May (the most recent and also the last month Righthaven filed a batch of lawsuits, all of which were prior to the Court's unfavorable standing rulings) listed on Righthaven's "July 14, 2011 Order Compliance Table", one notes that they are items 73-81. Five of these list the same "No address. Unable to serve complaint to date". (Exhibit X pp. 6-7) All are pro-se cases. Yet all have Summons prepared by Righthaven in the docket with full addresses for each defendant and no record of a summons returned for lack of ability to effect service. (Exhibit D)

Affiant questions whether Righthaven has made any effort to comply with the Order of the Court in regard to the defendants in these other cases also. From the record it appears that Righthaven treated these defendants similar to those in Affiant's case.

To be clear: Righthaven has NEVER attempted to mail anything to the Defendants in Righthaven v Law Med Consulting et al. and/or the addresses clearly stated on their own

Affidavit of Gregory Stocks

Summons. Righthaven has NEVER attempted service of the complaint, despite stating "Unable to serve complaint to date".

Respectfully submitted this 16th day of August, 2011

Gregory Stocks

640-D N Calvert St. Baltimore, MD 21202

(410) 913-4337

admin@ lawmedconsultant.com

CERTIFICATION OF MAILING

I hereby certify that on August 16, 2001 a true copy of this Affidavit For Judicial Notice, and all attachments was mailed via U.S. Regular Mail to the Clerk of the Court, U.S. District Court, District of Nevada, 400 S. Virginia Street, Reno, NV 89501, The Honorable Robert L. Hunt, U.S. District Court, District of Nevada, 333 South Las Vegas Blvd., Las Vegas, NV 89101, Shawn A. Mangano, 9960 West Cheyenne Avenue, Suite 170, Las Vegas, Nevada 89129-7701, and via electronic mail to Laurence F. Pulgram lpulgram@fenwick.com, Clifford C. Webb cwebb@fenwick.com Jennifer J. Johnson jijohnson@fenwick.com Kurt Opsahl kurt@eff.org Corynne McSherry corynne@eff.org and Chad Bowers bowers@lawyer.com

Gregory Stocks pro per 640-D North Calvert St. Baltimore, MD 21202 (410) 913-4337

àdmin@lawmedconsultant.com

EXHIBIT A: Summons in Righthaven v Law Med Consulting, et al.

UNITED STATES DISTRICT COURT

	for the
Dis	strict of Nevada
RIGHTHAVEN LLC, a Nevada limited-liability company)
Plaintiff	-)
v. LAW MED CONSULTING LLC, a Maryland limited-liability company et al.) Civil Action No. 2:11-cv-00717)
Defendant)
SUMMONS	S IN A CIVIL ACTION
To: (Defendant's name and address) LAW MED BLOG c/o Greg Stocks 640-D North Calvert St Baltimore, MD 21202	treet
A lawsuit has been filed against you.	
P. 12 (a)(2) or (3) — you must serve on the plaintiff an	d. Avenue, Suite 170 129
If you fail to respond, judgment by default will You also must file your answer or motion with the court	be entered against you for the relief demanded in the complaint.
	CLERK OF COURT
Date:	
	Signature of Clerk or Deputy Clerk

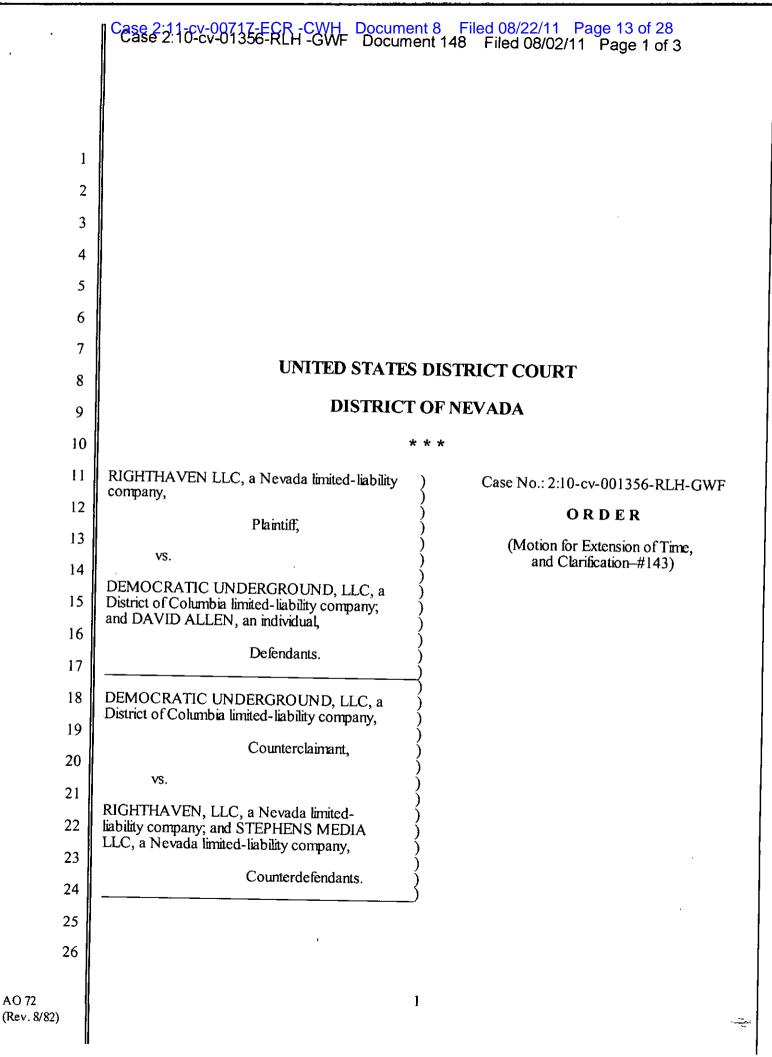
UNITED STATES DISTRICT COURT

CIVIL	for the
	District of Nevada
RIGHTHAVEN LLC, a Nevada limited company Plaintiff v. LAW MED CONSULTING LLC, a Malimited-liability company et al. Defendant)) (ivil Action No. 2:11-cv-00717
S	SUMMONS IN A CIVIL ACTION
To: (Defendant's name and address) LAW MED c/o Greg S 640-D Nor Baltimore,	
A lawsuit has been filed against yo	ou.
P. 12 (a)(2) or (3) — you must serve on the the Federal Rules of Civil Procedure. The whose name and address are: Shawn A. M. Shawn A. M. 9960 West Las Vegas	s summons on you (not counting the day you received it) — or 60 days if you ency, or an officer or employee of the United States described in Fed. R. Civ. e plaintiff an answer to the attached complaint or a motion under Rule 12 of answer or motion must be served on the plaintiff or plaintiff's attorney, Mangano, Esq. Mangano, Ltd. Cheyenne Avenue, Suite 170 , Nevada 89129 des of America
If you fail to respond, judgment by You also must file your answer or motion w	default will be entered against you for the relief demanded in the complaint. vith the court.
	CLERK OF COURT
Date:	
1,700	Signature of Clerk or Deputy Clerk

UNITED STATES DISTRICT COURT

for the		
District of Nevada		
RIGHTHAVEN LLC, a Nevada limited-liability company Plaintiff v. LAW MED CONSULTING LLC, a Maryland limited-liability company et al. Defendant))) Civil Action No. 2:11-cv-00717))	
SUMMONS	IN A CIVIL ACTION	
To: (Defendant's name and address) Greg Stocks 640-D North Calvert S Baltimore, MD 21202	treet	
A lawsuit has been filed against you.		
Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Shawn A. Mangano, Esq. Shawn A. Mangano, Ltd. 9960 West Cheyenne Avenue, Suite 170 Las Vegas, Nevada 89129 United States of America		
If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.		
	CLERK OF COURT	
Date:	Signature of Clerk or Deputy Clerk	

EXHIBIT B: Order in Righthaven v Democratic Underground



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Before the Court is Righthaven's **Motion for Extension, Clarification, and Stay** (#143, filed July 29, 2011). The Court has also considered Democratic Underground's Opposition (#145, filed Aug. 1, 2011).

Righthaven's counsel filed this motion in the afternoon of July 29, the day by which Righthaven was ordered to comply with the Court's sanctions. That same day, the Court granted a ten day extension through Monday, August 8, for Righthaven to comply with the Court's sanction. The Court deferred ruling on the remaining issues due to the lateness of Righthaven's filing.

In this motion, Righthaven requests that the Court clarify its sanctions order and extend the time for Righthaven to comply with the sanctions. The Court has already gratned an extension and will now address the requested clarifications. Righthaven desires to know: (1) whether simply filing the required documents in a case where the defendant has not yet been served would be sufficient, and (2) whether cases that have been dismissed but appealed constitute pending actions. Although the Court does not believe that clarification is necessary, the Court will clarify these and a few other issues.

First, as Righthaven points out in its motion, when the Court issued the sanctions the Court and counsel referred to "parties," not merely cases. Accordingly, it is insufficient to merely file the required documents; Righthaven must produce the documents to the *parties* in those cases as the Court clearly stated. The reason for this is simple: the Court is fully aware of Righthaven's practice of filing suit against a party and then entering settlement negotiations (and frequently settling) without ever serving the party. The Court concludes that depriving those parties of the benefit of the Court's order would be unjust.

Second, Righthaven must produce the required documents to all parties in all pending matters. The Court stated that the order would "not apply to those cases that have been dismissed unless there's going to be an appeal in those cases." (Dkt. #.) The Court clearly ordered that Righthaven produce these documents in cases that have been dismissed but are later appealed. This logically includes cases that have already been appealed. Further, if there are any

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pending motions in a case, that case is still pending in some fashion. Accordingly, Righthaven must produce the required documents in those cases as well even if all that remains pending is a request for attorney's fees or some similar matter.

Finally, after reexamining the issues and counsel's stated difficulties, the Court concludes that it was overly generous in granting the extension because counsel's situation is largely—if not entirely—of his and Righthaven's own making. Righthaven and its counsel should concentrate their efforts on material issues and court orders, not wishful research. Further, if counsel does not have time to do all that he needs to in Righthaven's dozens of cases, the Court kindly suggests that he or Righthaven obtain additional help, not complain to the Court about time constraints. Righthaven also informed the Court in its motion that it plans to request a stay of the monetary sanction. The Court already granted an extension, which it will not change, and suggests Righthaven not waste its time on a motion requesting any further relief from the sanction.

CONCLUSION

Accordingly, and for good cause appearing,

IT IS HEREBY ORDERED that Righthaven's Motion for Extension of Time and Clarification (#143) is GRANTED as detailed above.

Dated: August 2, 2011.

ROGER L. FIUNT

United States District Judge

AO 72 (Rev. 8/82)

EXHIBIT C: Righthaven Notice of Compliance

	Case 2:11 cv-00717 ECR - CWH Document 8 Document 1:	Filed 08/22/11 Page 17 of 28 53 Filed 08/08/11 Page 1 of 4
1 2 3 4 5 6 7 8 9	SHAWN A. MANGANO, ESQ. Nevada Bar No. 6730 shawn@manganolaw.com SHAWN A. MANGANO, LTD. 9960 West Cheyenne Avenue, Suite 170 Las Vegas, Nevada 89129-7701 Tel: (702) 304-0432 Fax: (702) 922-3851 Attorney for Righthaven LLC UNITED STATES DISTRICT OF	
11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27	RIGHTHAVEN LLC, a Nevada limited-liability company, Plaintiff, v. DEMOCRATIC UNDERGROUND, LLC, a District of Columbia limited-liability company; and DAVID ALLEN, an individual, Defendants. DEMOCRATIC UNDERGROUND, LLC, a District of Columbia limited-liability company, Counterclaimant, v. RIGHTHAVEN LLC, a Nevada limited-liability company; and STEPHENS MEDIA LLC, a Nevada limited-liability company, Counterdefendants.	Case No.: 2:10-cv-01356-RLH-GWF RIGHTHAVEN LLC'S NOTICE OF COMPLIANCE WITH JULY 14, 2013 ORDER

Righthaven LLC ("Righthaven") hereby advises of its compliance with the Court's July 14, 2011 (Doc. # 138, the "July 14th Order") as set forth herein.

The July 14th Order required Righthaven to produce a copy of the Strategic Alliance Agreement (the "SAA") to every party in every currently pending case, even those on appeal, in any jurisdiction where the copyright infringement allegations involve content assigned by Stephens Media, LLC ("Stephens Media"). (Doc. # 138). The July 14th Order also required Righthaven to provide a copy of the transcript from the July 14, 2011 Order to Show Cause hearing in the event the Court did not issue a formal written Order. (*Id.*) Righthaven was additionally required to provide a copy of the Court's Order dismissing Righthaven's claims for lack of standing (Doc. # 116). (*Id.*) Furthermore, Righthaven was ordered to advise the United States District Court for the District of Colorado about the July 14th Order. (*Id.*) Payment of a sanction fee in the amount of \$5,000 was also ordered.

Righthaven has complied with the July 14th Order as follows: (1) it has sent copies of the Court's dismissal for lack of standing, the SAA and the July 14, 2011 OSC hearing transcript to counsel appearing in all currently pending actions involving Stephens Media content; (2) it has sent copies of the Court's dismissal for lack of standing, the SAA and the July 14, 2011 OSC hearing transcript to all addresses on file for all *pro se* parties appearing in all currently pending actions involving Stephens Media content; (3) it has sent the United States District Court for the District of Colorado materials required by the July 14th Order, which have additionally been filed electronically by counsel for Leland Wolf in *Righthaven LLC v. Wolf*, Case No. 1:11-cv-00830-JLK; and (4) it has sent copies of the Court's dismissal for lack of standing, the SAA and the July 14, 2011 OSC hearing transcript to all defendants that have been served in pending actions, but which have failed to appear or against whom that default has been entered. Righthaven has electronically filed certificates of service in all pending actions that reflect copies of the required materials have been provided to counsel, *pro se* defendants, and to defending parties upon which service has been effectuated, but that have failed to appear or otherwise respond to the operative complaint. A summary of Righthaven's compliance efforts is set forth in the table attached hereto as Exhibit "1".

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Righthaven has not provided copies of the Court's dismissal for lack of standing, the SAA and the July 14, 2011 OSC hearing transcript to those parties that are named defendants in pending actions, but for which service of process of the operative version of the complaint has not been effectuated. Righthaven, however, has not deliberately failed to serve or failed to attempt to serve any defendant in any pending action. Unfortunately, some named defendants have managed to evade service of process or simply cannot be located so that service can be made upon them. Should Righthaven effectuate service on any defendant in any pending action that it been able to effectuate to date, it will provide those parties with copies of the SAA and the July 14, 2011 OSC hearing transcript pursuant to the July 14th Order.

Dated this 8th day of August, 2011.

SHAWN A. MANGANO, LTD.

By: /s/ Shawn A. Mangano SHAWN A. MANGANO, ESQ. Nevada Bar No. 6730 shawn@manganolaw.com 9960 West Cheyenne Avenue, Suite 170 Las Vegas, Nevada 89129-7701

Tel: (702) 304-0432 Fax: (702) 922-3851

Attorney for Righthaven LLC

Case 2:11-cv-00717-ECR -CWH Document 8 Filed 08/22/11 Page 20 of 28 Case 2:10-cv-01356-RLH -GWF Document 153 Filed 08/08/11 Page 4 of 4

CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that I on this 8th day of August, 2011, I served the foregoing document via the Court's CM/ECF system.

By: /s/ Shawn A. Mangano SHAWN A. MANGANO, ESQ.

Case 2:11-cv-00717-ECR -CWH Document 8 Filed 08/22/11 Page 21 of 28 Case 2:10-cv-01356-RLH -GWF Document 153-1 Filed 08/08/11 Page 1 of 16

RIGHTHAVEN LLC V. DEMOCRATIC UNDERGROUND, LLC

July 14, 2011 Order Compliance Table Exhibit "1" to Notice of Compliance

L	CASE NAME	CASE NO.	PARTY/ADDRESS SERVED
1.	Ecological Internet	10-00691	Ecological Internet, Inc.
			c/o Dr. Glenn Barry
]			N991 Manitowoc Road
		-	Denmark, WI 54208
2.	Goff Associates	10-00742	Goff Associates
			No address
}			Unable to serve complaint to date
			•
İ			Patrick Goff
		:	No address
<u> </u>			Unable to serve complaint to date
3.	Ozean Group	10-00798	Ozean Group
			c/o The UPS Store
	1		1300 King Street East
			Oshawa, Ontario
			Canada
			Thomas Wahl
	P 4 11		Terminated
4.	Futrell	10-00813	Ron Futrell
			c/o Jason Wiley, Esq.
5.	9 :4		jwiley@woodserickson.com
Э.	Smith	10-01031	Brien Smith
			2114 Del Pero Street
			Marysville, CA 95901
			77 1141
	1]	Fullthrottletv.net
]	c/o Brien Smith
			2114 Del Pero Street
6.	Vannix Communications	10-01035	Marysville, CA 95901
0.	valua Communications	10-01033	Vannix Communications Group, Inc.
	ļ		c/o Abby Nixon
		ĺ	3930 Swenson Street, Apt. 808
			Las Vegas, NV 89119
			Abby Nivon
			Abby Nixon
			3930 Swenson Street, Apt. 808
			Las Vegas, NV 89119
			Abby Nixon
			640 McNight Street
			Las Vegas, NV 89101
			Las v cgas, IN V 03101

RIGHTHAVEN LLC V. DEMOERATIC UNDERGROUND, LLC

July 14, 2011 Order Compliance Table Exhibit "1" to Notice of Compliance

72. Loosle 11-00627 Tony Carl Loosle 1772 N. 600 W.	
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
Logan, Utah 84321	
TCS, Inc.	
c/o Tony Carl Loosle	
1772 N. 600 W.	
Logan, Utah 84321	
73. Smith 11-00716 Jane Smith	
No address	
Unable to serve compla	int to date
Subliminalselfhypnosis	.com
No address	
Unable to serve compla	int to date
74. Law Med Consulting 11-00717 Greg Stocks	
No address	
Unable to serve compla	int to date
Law Med Blog	
No address	
Unable to serve compla	int to date
Law Med Consulting LI	LC
No address	
Unable to serve complain	int to date
75. Extreme DUI 11-00718 Johannes Garrido	
755 Watson Canyon Co	urt, # 234
San Ramon, CA 94582	
Extreme DUI	i
c/o Johannes Garrido	
755 Watson Canyon Co	urt, # 234
San Ramon, CA 94582	İ

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RIGHTHAVEN LLC V. DEMOERATIC UNDERGROUND, LLC

July 14, 2011 Order Compliance Table Exhibit "1" to Notice of Compliance

76.	Gunner's Alley	11.00710	
] /0.	Guiner's Ariey	11-00719	Gunner's Alley LLC
	1		c/o Gary Beaver, Esq.
			gbeaver@nexsenpruet.com
			No formal appearance made to date
			Affordable Hunting Trips
İ]	c/o Gary Beaver, Esq.
			gbeaver@nexsenpruet.com
			Bradford Justus
		ļ	c/o Gary Beaver, Esq.
		<u>i</u>	gbeaver@nexsenpruet.com
77.	Newsblaze	11-00720	Newsblaze LLC
			Alan Gray
ŀ			c/o James M. DeVoy, Esq.
			jmd@randazza.com
ĺ			Mark Randazza, Esq.
			mjr@randazza.com
78.	Computer Services One	11-00721	Norman Edwards
}]		919 18 th Street South
			St. Petersburg, FL 33712
			Computer Services One LLC
			Computer Services One LLC c/o Norman Edwards
			919 18 th Street South
			St. Petersburg, FL 33712
79.	Kirk	11-00722	John Kirk
ĺ	İ		No address
			Unable to serve complaint to date
80.	Brommell	11-00724	Neil Brommell
		1	No address
!			Unable to serve complaint to date
		1	
			Holly L. Brewer
			No address
			Unable to serve complaint to date
81.	Sieber	11-00729	No address
-			Unable to serve complaint to date
82.	Mostofi	11-01160	Dean Mostofi
			1737 Glastonberry Road
			Potomac, MD 20854

EXHIBIT D: Summons in Righthaven Cases

UNITED STATES DISTRICT COURT

for the

District of Nevada

RIGHTHAVEN LLC, a Nevada limited-liability company,)
Plaintiff)
v. NEIL G. BROMMELL, an individual; and HOLLY L. BREWER, an individual,) Civil Action No. 2:11-cv-00724-RLH -RJJ)
Defendant)

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Neil G. Brommell 376 Queen Elizabeth Place Ottawa, ON K1S 3N3

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Shawn A. Mangano, Esq.

Shawn A. Mangano, Ltd.

9960 West Cheyenne Avenue, Suite 170

Las Vegas, Nevada 89129 United States of America

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK

Lance S. Wilson

(By) DEPUTY CLERK

May 6, 2011

UNITED STATES DISTRICT COURT

for the

District of Nevada

RIGHTHAVEN LLC, a Nevada limited-liability company,)
Plaintiff)
ν.) Civil Action No. 2:11-cv-00724-RLH -RJJ
NEIL G. BROMMELL, an individual; and HOLLY L. BREWER, an individual,)
Defendant)

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Holly L. Brewer 927 Brass Ring Road Las Vegas, NV 89123

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Shawn A Mangang Feg.

Shawn A. Mangano, Esq. Shawn A. Mangano, Ltd.

9960 West Cheyenne Avenue, Suite 170

Las Vegas, Nevada 89129 United States of America

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

LANCE S. WILSON	COUNT PO	May 6, 2011	
Lance S. Wilson		DATE	
Lance S. Wilson			

UNITED STATES DISTRICT COURT

for the

District of Nevada

RIGHTHAVEN LLC, a Nevada limited-liability company,)		
Plaintiff	-))		
v.	Ś	Civil Action No.	2:11-cv-00729
BOB SIEBER, an individual)		
	.)		
Defendant)		

مندوسم

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Bob Sieber RT 2 Box 257-20 Nowata, OK 74048-9673

A lawsuit has been filed against you.

(By) DEPUTY CLERK

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Shawn A Mangano Fed.

Shawn A. Mangano, Esq. Shawn A. Mangano, Ltd.

9960 West Cheyenne Avenue, Suite 170

Las Vegas, Nevada 89129 United States of America

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

LANCE S. WILSON	COUNT FO	5/9/11
CLERK Lance S. Wilson		ATE

