IN THE UNITED STATES DISTRICT COURT DISTRICT OF SOUTH CAROLINA

RIGHTHAVEN LLC)	Civil Action No: 2:10-cv-03075-RMG-JDA
	Plaintiff)	
)	
Vs.)	
)	
)	
DANA EISER)	
	Defendant)	RIGHTHAVEN LLC'S AMENDED
			ANSWERS TO LR 26.01 INTERROGATORIES

Plaintiff provides the following amended response to Local Rule 26.01 Interrogatories:

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

None. Plaintiff acknowledges that MediaNews Group, 101 West Colfax Avenue, Denver, Colorado 80202 (303) 954-6360 has a potential 50% interest after the satisfaction of certain defined costs incurred by plaintiff in any recovery in this action in accordance with the terms and conditions contained in a Copyright Alliance Agreement entered into by Plaintiff and MediaNews Group.

B) As to each claim, state whether it should be tried jury or nonjury and why.

Plaintiff requests a jury as to all issues

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

None

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

Claims arise in this district

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal?

No

(F) [Defendants only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

Not applicable

(G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

Not applicable

_/s/ Edward A. Bertele___ Edward A. Bertele Federal ID 10293 Edward A. Bertele, Attorney at Law 1812 Pierce St. Charleston, SC 29492 843-471-2082 ebertele@msn.com Attorney for Plaintiff

August 2, 2011