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17 UNITED STATES DISTRICT COURT
18 FOR THE DISTRICT OF NEVADA

19 RIGHTHAVEN LLC, a Nevada limited-liability)
20 company,)

21 Plaintiff,)

22 v.)

23 THOMAS A. DIBIASE, an individual,)

24 Defendant.)

25 THOMAS A. DIBIASE, an individual,)

26 Counterclaimant,)

27 v.)

28 RIGHTHAVEN LLC, a Nevada Limited-)
Liability Company,)

Counter-defendant.)

CASE NO.: 2:10-cv-1343 RLH PAL

STIPULATION AND ORDER
REGARDING RIGHTHAVEN'S
PRODUCTION OF COMPUTER SYSTEMS
INFORMATION

1 IT IS HEREBY STIPULATED BETWEEN Plaintiff/Judgment Debtor Righthaven LLC
2 (“Righthaven”), through its attorneys of record, and Defendant/Judgment Creditor, Thomas A.
3 DiBiase, through his attorneys of record, that Mr. DiBiase may review in its entirety the
4 information contained on Righthaven’s computer systems produced by Righthaven in response to
5 the Court’s Minute Order dated October 16, 2012. Righthaven and Mr. DiBiase further stipulate
6 that Mr. DiBiase will not take the position that Righthaven waived any privilege by virtue of
7 making the content of the computer systems available in response to the Minute Order.

8
9 IT IS SO STIPULATED AND AGREED.

DATED: November 1, 2012

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11 _____
/s/ Shawn Mangano

/s/ Kurt Opsahl

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Attorneys for Judgment Creditor Thomas
DiBiase

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24 **IT IS SO ORDERED.**

25 DATED and DONE this ____ day of November 2012.

26
27 _____
28 UNITED STATES MAGISTRATE JUDGE

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DECLARATION PURSUANT TO SPECIAL ORDER 109

I, Kurt Opsahl, hereby declare pursuant to Special Order 109 that I have obtained Judgment Debtor's concurrence in the filing of this document from Shawn Mangano, Counsel for Judgment Debtor Righthaven LLC.

Executed on November 1, 2012, in San Francisco, California.

/s/ Kurt Opsahl
Kurt Opsahl

* * * * *

CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2012, I electronically filed the foregoing document with the Clerk of the Court, using the CM/ECF system, which will send notification of such filing to the counsel of record in this matter who are registered on the CM/ECF system.

Executed on November 1, 2012, in San Francisco, California.

/s/ Kurt Opsahl
Kurt Opsahl