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5 *Attorney for Righthaven LLC*
6

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

9 RIGHTHAVEN LLC, a Nevada limited-
10 liability company,

11 Plaintiff,

12 v.

13 THOMAS A. DIBIASE, an individual,

14 Defendant.
15

16 AND RELATED COUNTERCLAIM
17

Case No.: 2:10-cv-01343-RLH-PAL

**NOTICE OF COMPLIANCE WITH
OCTOBER 16, 2012 ORDER**

18
19 Shawn A. Mangano, counsel of record pending his withdrawal on behalf of Plaintiff and
20 Counter-defendant Righthaven LLC (“Righthaven”), hereby submits this Notice of Compliance
21 with the Court’s October 16, 2012 Order (the “October 16th Order,” Doc. # 121). The October
22 16th Order provides that Mr. Mangano’s Motion to Withdraw as Counsel of Record for
23 Righthaven (Doc. # 116) would not be granted until certain desktop computers, related
24 components and the company’s server were made available to Defendant’s counsel during a 14-
25 day period following its entry. (Doc. # 121.) This Notice of Compliance advises that Defendant’s
26 counsel did not ask to inspect the computer components during the relevant time period and that
27 Mr. Mangano has surrendered all computer components in his possession to Righthaven’s new
28

1 counsel, Mr. Michael Mushkin. Accordingly, Mr. Mangano respectfully requests the Court grant
2 his Motion to Withdraw as Counsel of Record for Righthaven.

3 On October 30, 2012, a Substitution of Counsel was entered by Michael Mushkin, Esq.,
4 as counsel for Righthaven, and was consented to by Steven A. Gibson on behalf of the company
5 and by Shawn A. Mangano, Esq. as withdrawing counsel. (Doc. # 122.) That same day, all
6 desktop computers, server and related components held in storage by Mr. Mangano were
7 delivered to Mr. Mushkin's office. Defendant's counsel was advised of the pending substitution
8 and made aware of that all desktop computers, related components and the company's server
9 were delivered to Mr. Mushkin's office. At no time before the delivery of these items had
10 Defendant's counsel made arrangements for their inspection and/or copying as authorized by the
11 October 16th Order. Accordingly, any inspection and/or copying the electronic information
12 stored on these components by the Defendant shall be coordinated with Righthaven's new
13 counsel, Mr. Mushkin.

14 Dated this 4th day of November 2012.

15 SHAWN A. MANGANO, LTD.

16 By: /s/ Shawn A. Mangano
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21 **CERTIFICATE OF SERVICE**

22 Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that on this 4th day of
23 November 2012, I caused a copy of the foregoing document to be served by the Court's
24 CM/ECF system.

25 SHAWN A. MANGANO, LTD.

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