

COLLEEN BAL (*pro hac vice*)
cbal@wsgr.com
BART E. VOLKMER (*pro hac vice*)
bvolkmer@wsgr.com
WILSON SONSINI GOODRICH & ROSATI
650 Page Mill Road
Palo Alto, Ca 94304-1050
Telephone: (650) 493-9300
Facsimile: (650) 493-6811

SHAWN A. MANGANO, ESQ.
Nevada Bar No. 6730
shawn@manganolaw.com
SHAWN A. MANGANO, LTD.
9960 West Cheyenne Ave., Suite 170
LAS VEGAS, Nevada 89129-7701
(702) 304-0432 – telephone
(702) 922-3851 – facsimile

Attorneys for Righthaven LLC

KURT OPSAHL (*pro hac vice*)
kurt@eff.org
CORYNNE MCSHERRY (*pro hac vice*)
corynne@eff.org
ELECTRONIC FRONTIER FOUNDATION
454 Shotwell Street
San Francisco, Ca 94110
Telephone: (415) 436-9333
Facsimile: (415) 436-9993

CHAD BOWERS
bowers@lawyer.com
CHAD A. BOWERS, LTD
Nevada State Bar No. 7283
3202 West Charleston Boulevard
Las Vegas, Nevada 89102
Telephone: (702) 457-1001

Attorneys For Defendant & Counterclaimant
THOMAS A. DIBIASE

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RIGHTHAVEN LLC, a Nevada limited-
liability company,

Plaintiff,

v.

THOMAS A. DIBIASE, an individual,

Defendant.

And Related Counterclaim

CASE NO.: 2:10-cv-01343-RLH-PAL
INTERIM STATUS REPORT

1 Pursuant to Local Rule 26-3, Plaintiff/Counter-defendant, Righthaven LLC
2 (“Righthaven”), and Defendant and Counterclaimant, Thomas A. DiBiase (“Mr. DiBiase”)
3 (collectively the “Parties”) by and through their respective counsel, submit the following Interim
4 Status Report. The scheduling order in this action instructed the parties to file an interim status
5 report on April 11, 2011. See Docket No. 36 at 4. Discovery in this action (including expert
6 discovery) is scheduled to close on July 22, 2011. Accordingly, under Local Rule 26-3, the
7 parties intend to submit a status report on **May 23, 2011** stating the time they estimate will be
8 required for trial, giving three (3) alternative available trial dates, and stating whether trial will
9 be eliminated or its length affected by substantive motions. If the Court seeks this information
10 at a sooner date, the parties will submit an updated status report as directed by the Court.

11 Respectfully submitted,

12 DATED: April 11, 2011

DATED: April 11, 2011

13 WILSON SONSINI GOODRICH & ROSATI

SHAWN A. MANGANO, LTD.

14
15 By: /s/ Bart E. Volkmer
16 Colleen Bal, Esq.
17 Bart E. Volkmer, Esq.
18 650 Page Mill Road
19 Palo Alto, California 94304-1050

By: /s/ Shawn A. Mangano
Shawn A. Mangano, Esq.
9960 West Cheyenne Avenue
Suite 170
Las Vegas, Nevada 89129

20 THE ELECTRONIC FRONTIER
21 FOUNDATION
22 Kurt Opsahl, Esq.
23 Corynne McSherry, Esq.
24 454 Shotwell Street
25 San Francisco, California 94110

*Attorney for Plaintiff and Counter-
Defendant Righthaven LLC*

26 CHAD A. BOWERS, LTD.
27 Chad A. Bowers, Esq.
28 3202 West Charleston Boulevard
Las Vegas, Nevada 89102

*Attorneys for Defendant and
Counterclaimant Thomas A. DiBiase*

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATION

I, Bart E. Volkmer, am the ECF User whose identification and password are being used to file the **INTERIM STATUS REPORT**. In compliance with the Electronic Filing Procedures, I hereby attest that Shawn A. Mangano has concurred in this filing.

DATED: April 11, 2011

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: /s/ Bart E. Volkmer
 Bart E. Volkmer

Attorneys for Defendant/Counterclaimant

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of April 2011, I caused a copy of the foregoing INTERIM STATUS REPORT to be served using the Court's CM/ECF system.

_____/s/ Deborah Grubbs_____