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(702) 527-5900  
7 Attorneys for Plaintiff

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

10  
11 RIGHTHAVEN LLC, a Nevada limited-  
12 liability company,

13  
14 Plaintiff,

15 v.

16 DEMOCRATIC UNDERGROUND, LLC, a  
17 District of Columbia limited-liability  
company; and DAVID ALLEN, an individual,

18 Defendants.  
19

Case No.: 2:10-cv-01356

**COMPLAINT AND DEMAND  
FOR JURY TRIAL**

20 Righthaven LLC (“Righthaven”) complains as follows against Democratic Underground,  
21 LLC (“Democratic Underground”) and David Allen (“Mr. Allen”; collectively with Democratic  
22 Underground known herein as the “Defendants”), on information and belief:  
23

24 **NATURE OF ACTION**

25 1. This is an action for copyright infringement pursuant to 17 U.S.C. § 501.  
26  
27  
28

**PARTIES**

1  
2 2. Righthaven is, and has been at all times relevant to this lawsuit, a Nevada limited-  
3 liability company with its principal place of business in Nevada.

4 3. Righthaven is, and has been at all times relevant to this lawsuit, in good standing  
5 with the Nevada Secretary of State.

6 4. Democratic Underground is, and has been at all times relevant to this lawsuit, a  
7 District of Columbia limited-liability company.

8 5. Democratic Underground is, and has been at all times relevant to this lawsuit,  
9 identified by the current registrar, Dotster, Inc. (“Dotster”), as the registrant for the Internet  
10 domain found at <democraticunderground.com> (the “Domain”).

11 6. Democratic Underground is, and has been at all times relevant to this lawsuit,  
12 identified by Dotster as an administrative contact and technical contact for the Domain.

13 7. Mr. Allen is, and has been at all times relevant to this lawsuit, identified by  
14 Dotster as an administrative contact and technical contact for the Domain.

15 8. Mr. Allen is, and has been at all times relevant to this lawsuit, identified as the  
16 owner of Democratic Underground by the content accessible through the Domain (the content  
17 accessible through the Domain and the Domain itself, collectively known herein as the  
18 “Website”), as evidenced by the “Contact Us” page of the Website, attached hereto as Exhibit 1.

19  
20 **JURISDICTION**

21 9. This Court has original subject matter jurisdiction over this copyright  
22 infringement action pursuant to 28 U.S.C. § 1331 and 28 U.S.C. § 1338(a).

23 10. Righthaven is the owner of the copyright in the literary work entitled: “Tea Party  
24 power fuels Angle” (the “Work”), attached hereto as Exhibit 2.

25 11. At all times relevant to this lawsuit, the Work has depicted and depicts the  
26 original source publication as the Las Vegas *Review-Journal*.

27 12. The Defendants willfully copied, on an unauthorized basis, a substantial and  
28 significant portion of the Work from a source emanating from Nevada.

1           13.     On or about May 13, 2010, the Defendants displayed, and continue to display, an  
2 unauthorized reproduction of the Work (the “Infringement”), attached hereto as Exhibit 3, on the  
3 Website.

4           14.     At all times relevant to this lawsuit, the Infringement has depicted and depicts the  
5 original source publication as the *Las Vegas Review-Journal*.

6           15.     The subject matter, at least in part, of the Work and the Infringement, is the  
7 support given to Sharon Angle by the Tea Party and its effect on the race for the republican  
8 nomination to oppose Harry Reid for one of Nevada United States Senate seats.

9           16.     At all times relevant to this lawsuit, the Defendants knew that the Work was  
10 originally published in the *Las Vegas Review-Journal*.

11           17.     At all times relevant to this lawsuit, the Defendants knew that the infringement  
12 was and is of specific interest to Nevada residents.

13           18.     The Defendants’ display of the Infringement was and is purposefully directed at  
14 Nevada residents.

15           19.     The Defendants knew, or reasonably should have known, that websites, such as  
16 the Website, are and were at all times relevant to this lawsuit, the habitual subject of postings by  
17 others of copyright-infringing content.

18           20.     At all times relevant to this lawsuit, the Defendants did not institute any proactive  
19 policy of precluding or attempting to preclude the posting by others of copyright-infringing  
20 content on the Website.

21           21.     At all times relevant to this lawsuit, the Defendants did not institute any proactive  
22 policy of monitoring or attempting to monitor the posting by others of copyright-infringing  
23 content on the Website.

24           22.     At all times relevant to this lawsuit, the Defendants did not institute any proactive  
25 policy of deleting or attempting to delete the posting by others of copyright-infringing content on  
26 the Website.

27           23.     At all times relevant to this lawsuit, the Defendants’ failure to institute any  
28 proactive policies intended to address the posting by others of copyright-infringing content on

1 the Website constituted and constitutes the Defendants' willful blindness to copyright  
2 infringements occurring on the Website.

3  
4 **VENUE**

5 24. The United States District Court for the District of Nevada is an appropriate  
6 venue, pursuant to 28 U.S.C. § 1391(b)(2), because a substantial part of the events giving rise to  
7 the claim for relief are situated in Nevada.

8 25. The United States District Court for the District of Nevada is an appropriate  
9 venue, pursuant to 28 U.S.C. § 1391(c), because Democratic Underground is subject to personal  
10 jurisdiction in Nevada.

11 26. The United States District Court for the District of Nevada is an appropriate  
12 venue, pursuant to 28 U.S.C. § 1400(a), because the Defendants are subject to personal  
13 jurisdiction in Nevada.

14  
15 **FACTS**

16 27. The Work constitutes copyrightable subject matter, pursuant to 17 U.S.C. §  
17 102(a)(1).

18 28. Righthaven is the owner of the copyright in and to the Work.

19 29. The Work was originally published on May 13, 2010.

20 30. On July 9, 2010, the United States Copyright Office (the "USCO") granted  
21 Righthaven the registration to the Work, copyright registration number TX0007171977 (the  
22 "Registration") and attached hereto as Exhibit 4 is evidence of the Registration from the official  
23 USCO database record depicting the occurrence of the Registration.

24 31. On or about May 13, 2010, the Defendants displayed, and continue to display, the  
25 Infringement on the Website.

26 32. The Defendants did not seek permission, in any manner, to reproduce, display, or  
27 otherwise exploit the Work.

1           33.     The Defendants were not granted permission, in any manner, to reproduce,  
2 display, or otherwise exploit the Work.

3  
4                                   **CLAIM FOR RELIEF: COPYRIGHT INFRINGEMENT**

5           34.     Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
6 33 above.

7           35.     Righthaven holds the exclusive right to reproduce the Work, pursuant to 17  
8 U.S.C. § 106(1).

9           36.     Righthaven holds the exclusive right to prepare derivative works based upon the  
10 Work, pursuant to 17 U.S.C. § 106(2).

11           37.     Righthaven holds the exclusive right to distribute copies of the Work, pursuant to  
12 17 U.S.C. § 106(3).

13           38.     Righthaven holds the exclusive right to publicly display the Work, pursuant to 17  
14 U.S.C. § 106(5).

15           39.     The Defendants reproduced the Work in derogation of Righthaven's exclusive  
16 rights under 17 U.S.C. § 106(1).

17           40.     The Defendants created an unauthorized derivative of the Work in derogation of  
18 Righthaven's exclusive rights under 17 U.S.C. § 106(2).

19           41.     The Defendants distributed, and continue to distribute, an unauthorized  
20 reproduction of the Work on the Website, in derogation of Righthaven's exclusive rights under  
21 17 U.S.C. § 106(3).

22           42.     The Defendants publicly displayed, and continue to publicly display, an  
23 unauthorized reproduction of the Work on the Website, in derogation of Righthaven's exclusive  
24 rights under 17 U.S.C. § 106(5).

25           43.     Democratic Underground has willfully engaged in the copyright infringement of  
26 the Work.

27           44.     Mr. Allen has willfully engaged in the copyright infringement of the Work.  
28

1 45. The Defendants' acts as alleged herein, and the ongoing direct results of those  
2 acts, have caused and will continue to cause irreparable harm to Righthaven in an amount  
3 Righthaven cannot ascertain, leaving Righthaven with no adequate remedy at law.

4 46. Unless the Defendants are preliminarily and permanently enjoined from further  
5 infringement of the Work, Righthaven will be irreparably harmed, and Righthaven is thus  
6 entitled to preliminary and permanent injunctive relief against further infringement by the  
7 Defendants of the Work, pursuant to 17 U.S.C. § 502.

8  
9 **PRAYER FOR RELIEF**

10 Righthaven requests that this Court grant Righthaven's claim for relief herein as follows:

11 1. Preliminarily and permanently enjoin and restrain the Defendants, and the  
12 Defendants' officers, agents, servants, employees, attorneys, parents, subsidiaries, related  
13 companies, partners, and all persons acting for, by, with, through, or under the Defendants, from  
14 directly or indirectly infringing the Work by reproducing the Work, preparing derivative works  
15 based on the Work, distributing the Work to the public, and/or displaying the Work, or ordering,  
16 directing, participating in, or assisting in any such activity;

17 2. Direct the Defendants to preserve, retain, and deliver to Righthaven in hard copies  
18 or electronic copies:

19 a. All evidence and documentation relating in any way to the Defendants'  
20 use of the Work, in any form, including, without limitation, all such evidence and  
21 documentation relating to the Website;

22 b. All evidence and documentation relating to the names and addresses  
23 (whether electronic mail addresses or otherwise) of any person with whom the  
24 Defendants have communicated regarding the Defendants' use of the Work; and

25 c. All financial evidence and documentation relating to the Defendants' use  
26 of the Work;

27 3. Direct Dotster and any successor domain name registrar for the Domain to lock  
28 the Domain and transfer control of the Domain to Righthaven;

1 4. Award Righthaven statutory damages for the willful infringement of the Work,  
2 pursuant to 17 U.S.C. § 504(c);

3 5. Award Righthaven costs, disbursements, and attorneys’ fees incurred by  
4 Righthaven in bringing this action, pursuant to 17 U.S.C. § 505;

5 6. Award Righthaven pre- and post-judgment interest in accordance with applicable  
6 law; and

7 7. Grant Righthaven such other relief as this Court deems appropriate.

8  
9 **DEMAND FOR JURY TRIAL**

10 Righthaven requests a trial by jury pursuant to Fed. R. Civ. P. 38.

11 Dated this tenth day of August, 2010.

12  
13 RIGHTHAVEN LLC

14  
15 By: /s/ J. Charles Coons  
16 STEVEN A. GIBSON, ESQ.  
17 Nevada Bar No. 6656  
18 J. CHARLES COONS, ESQ.  
19 Nevada Bar No. 10553  
20 JOSEPH C. CHU, ESQ.  
21 Nevada Bar No. 11082  
22 9960 West Cheyenne Avenue, Suite 210  
23 Las Vegas, Nevada 89129-7701  
24 Attorneys for Plaintiff  
25  
26  
27  
28

# EXHIBIT 1

# EXHIBIT 1



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## Contact Us

Below is the contact information for the administrators of Democratic Underground. Please note that we only respond to email during regular business hours. Usually, inquiries get a response within one business day.

## Where to Get Answers to Your Questions

We provide a number of resources to help you find the information you are looking for. Before you ask your question, please take a moment to see if an answer is available elsewhere. For answers to questions about our discussion forum, we recommend that you check these two pages:

[Help and FAQs](#)[Discussion Forum Rules](#)

## General Contact Information

### \*\* IMPORTANT \*\*

If you are a registered member of our discussion forum, Remember to include your **forum username** in your email message!

Ask the Administrators:

*For Questions about our Discussion Forum*  
[admin@democraticunderground.com](mailto:admin@democraticunderground.com)

General Email:

*For All other Inquiries*  
[mail@democraticunderground.com](mailto:mail@democraticunderground.com)

Snail Mail:

Democratic Underground  
P.O. Box 53350  
Washington, DC 20009

## The DU Administrators

### David Allen

Forum username Skinner  
Owner and Co-founder

Contact Skinner for questions about: *Discussion forum, Donations to DU, General inquiries about DU*

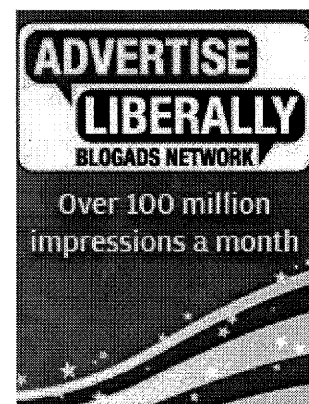
[skinner@democraticunderground.com](mailto:skinner@democraticunderground.com)

### Dave Allsopp

Forum username EarlG  
Co-founder and Front Page Editor

Contact EarlG for questions about: *Writing an Article for the DU*

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[earlg@democraticunderground.com](mailto:earlg@democraticunderground.com)

**Brian Leitner**

Forum username Elad

Lead Programmer

Contact Elad for questions about: *Technical issues, Bug Reporting*

[elad@democraticunderground.com](mailto:elad@democraticunderground.com)

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# EXHIBIT 2

# EXHIBIT 2

May 13, 2010  
Copyright © Las Vegas Review-Journal

## Tea Party power fuels Angle

Laura Myers

By LAURA MYERS

LAS VEGAS REVIEW-JOURNAL

Fueled by a burst of support from the **Tea Party**, Sharron **Angle** has rocketed into a near dead heat with Sue Lowden in the white-hot U.S. Senate Republican primary, according to a new poll commissioned by the Las Vegas Review-Journal.

Lowden, who had been the Republican front-runner since February, lost support to **Angle**, the former Reno assemblywoman seen by likely Republican voters as the most conservative candidate in a contest in which three-quarters of Republican voters say they're somewhat or very conservative, the poll showed.

Danny Tarkanian lost ground to **Angle**, too. She passed him after gaining a bit of political star **power** and a bunch of financial support from an endorsement by the **Tea Party Express**, which launched radio and TV ads to help her win the GOP nomination to face U.S. Sen. Harry Reid in the fall.

All three top GOP candidates are capable of beating Reid, according to previous polls that have shown the Democratic **Party** incumbent in an uphill battle to win a fifth Senate term on Nov. 2.

"I'm confident that we'll be able to win the primary and also to defeat Harry Reid," **Angle** said Wednesday from rural Fallon, where she campaigned door to door, spoke to a group at the convention center and attended a gun supporters event. "These numbers really confirm what we've been fairly certain of all along: that if people heard my conservative message, they would respond."

**Angle** said voters can look at her eight-year record in the Assembly that shows a consistent pattern of opposing taxes and supporting smaller government. Those are two tenets of the **Tea Party** movement and conservative values in opposition to the Democratic **Party's** hold on Congress and the White House, government bailouts of industry, and Reid's and President Barack Obama's signature health insurance overhaul.

Lowden said she wasn't worried about the tightening primary race nine days before early voting starts May 22 and three weeks before the June 8 vote.

"We're confident that our lead will hold," Lowden said in an interview in Las Vegas. "We'll have a strong get-out-the-vote effort. You only need one more vote to win, but we'll win by more than that."

According to the Mason-Dixon poll, if the Republican primary were held today: Lowden would win 30 percent of the vote; **Angle** 25 percent; Tarkanian 22 percent; John Chachas 3 percent; and Chad Christensen 2 percent.

The telephone survey of 500 likely Republican voters in Nevada was taken on Monday and Tuesday and has a margin of error of plus or minus 4.5 percentage points.

In a similar Mason-Dixon survey taken April 5 to 7, Lowden led the crowded field of 12 Republicans with 45 percent support compared with 27 percent for Tarkanian, 5 percent for **Angle**, 4 percent for Las Vegas Assemblyman Christensen and 3 percent for Chachas, an Ely native and Wall Street investment banker.

"Lowden's loss has been **Angle's** gain," said Mason-Dixon pollster Brad Coker. "Lowden has been the anointed front-runner for a couple of months, which made her a target for everybody. And **Angle** got the **Tea Party** endorsement, and she's the most conservative candidate running."

**Angle** also has a history "of running strong down the stretch" in close elections, Coker added.

In 2006, **Angle** was all but counted out in a congressional GOP primary until the last few weeks, and then she narrowly lost to Rep. Dean Heller by fewer than 500 votes. Two years ago, she almost beat state Senate Minority Leader Bill Raggio, R-Reno, one of Nevada's most powerful lawmakers.

"Obviously, **Angle** still has her homestretch legs," Coker said, although he added that anything can happen in such a competitive race. "I think you have to be conservative and say it's a three-way race. But trend-wise, **Angle** has jumped out quickly and has the momentum."

The **Tea Party** Express, the national group that held an anti-Reid protest in the senator's hometown of Searchlight in late March, shook up the race April 15 when it endorsed **Angle** at a Tax Day news conference in Washington, D.C. The group's political action committee has been raising money for **Angle** with a goal of \$500,000. It already has spent \$200,000 for her, including on radio and TV ads.

Meantime, **Angle** has been stacking up endorsements from more than two dozen conservative groups and people, from Gun Owners of America to "Joe the Plumber."

**Angle's** name recognition has jumped to 85 percent compared with 67 percent about a month ago. Only 4 percent of GOP primary voters do not know Lowden's name, and only 3 percent do not know Tarkanian, a real estate developer and former basketball star for the University of Nevada, Las Vegas, whose dad is well-known ex-basketball coach Jerry Tarkanian.

The Tarkanian campaign expressed skepticism that **Angle** had risen so high so fast. Jamie Fisfis, consultant to the campaign, said his tracking polls show **Angle** moving up to 16 percent support, Lowden dropping to 30 percent and Tarkanian gaining to tie the GOP front-runner in his best showing so far.

"In my mind it's still a two-way race because **Angle** does not have the name recognition to be ahead of either of the two candidates in contention," Fisfis said.

Lowden blamed part of her recent drop in the polls to attacks from both her GOP foes — especially Tarkanian — and Reid, whose campaign has focused on her, criticizing her record as a casino executive who with her husband, Paul Lowden, has owned and managed four hotel-casinos.

The Reid campaign has released records that show problems with health and safety violations at the Lowden properties over the years that resulted in heavy fines and offered details of angry disputes with the unions over medical benefits for their workers.

Tarkanian has criticized Lowden for voting for fees as a lawmaker in the early 1990s and for telling a reporter recently that she understood why some members of Congress voted for the first government bailout during the Bush administration when lawmakers said it was needed to avoid massive business failures and a depression. She since has said she wouldn't have voted for bailouts then or now.

"It's not unexpected that the race would tighten after Harry Reid has spent \$8 million going after me," Lowden said Wednesday, referring to how much his campaign has spent. "The Reid

campaign and Harry Reid do not want me to come out of this primary, and so they have targeted me."

In the past month, Lowden has been dogged by near daily attacks by the Democratic **Party** for suggesting people could barter with their doctors for cheaper health care.

She defended her remarks made at a town hall meeting in Mesquite by saying that in the old days, people even used chickens to barter, a comment that prompted video spoofs and late-night talk show jokes about her.

The gaffe hasn't had much effect on Republican primary voters, however, according to the new Mason-Dixon poll, which asked what effect her remarks would have on support for her.

Some 70 percent of those polled said Lowden's bartering remarks would have "no effect" on their voting decision, 15 percent said they would be "less likely" to vote for her, and 12 percent said they would be "more likely" to vote for her. Another 3 percent said they weren't sure.

Lowden said that during her campaign stops in rural Nevada, voters have told her that they're still bartering with doctors to get cheaper medical care in some cases.

"I never said this was my health care policy, but bartering is still happening out there in rural Nevada," Lowden said Wednesday. "Harry Reid is the one who's out of touch if he doesn't know that."

Lowden has been running a primary and general campaign at the same time, which has cost her support among staunch conservatives and **Tea Party** movement supporters.

According to the new poll, 58 percent said they consider themselves "a supporter of the **Tea Party** movement." Another 27 percent do not, and 15 percent said they don't know or refused to answer.

"I am a member of the **Tea Party** movement, as well, and many of my supporters and volunteers are members," said Lowden, who spoke at the **Tea Party** Express event in Searchlight and has attended many local **Tea Party** group events as candidates compete for that key slice of the 2010 vote.

"It's not unexpected that Sharron would get their support, but they know I'm one of them, too."

LAS VEGAS REVIEW-JOURNAL

reviewjournal.com

OPINION POLL

U.S. SENATE

-- If the 2010 Republican primary election for Nevada's U.S. Senate seat were held today would you vote for:

Sue Lowden 30%

Sharron **Angle** 25%

Danny Tarkanian 22%

John Chachas 3%

Chad christensen 2%

Undecided 18%

-- Republican Senate candidate Sue Lowden recently made remarks about bartering with doctors and saying "In the olden days our grandparents, they would bring a chicken to the doctor." Do Lowden's remarks make you more likely to vote for her in the primary, less likely to vote for her or do they have no real effect on your voting decision?

MORE LIKELY 12%

LESS LIKELY 15

NO EFFECT 70

NOT SURE 3

-- Would you support or oppose having Nevada enact a law similar to Arizona's that would give state and local law enforcement the **power** to ask people already stopped for possible violations of the law to show proof they are in the country legally and then arrest those that could not provide such proof?

SUPPORT 85%

OPPOSE 8

UNDECIDED 7

-- Do you consider yourself a supporter of the **Tea Party** movement, or not?

Yes 58%

No 27

Don't know/refused 15

-- Would you describe your personal political views as:

VERY CONSERVATIVE 43%

SOMEWHAT CONSERVATIVE 34

MODERATE 18

SOMEWHAT LIBERAL 3

VERY LIBERAL --

DON'T KNOW/REFUSED 2

Margin of error: plus or minus 4.5 percentage points.

SOURCE: Mason-Dixon Polling & Research Inc.

LAS VEGAS REVIEW-JOURNAL

Contact Laura Myers at lmyers@reviewjournal.com or 702-387-2919.

# EXHIBIT 3

# EXHIBIT 3

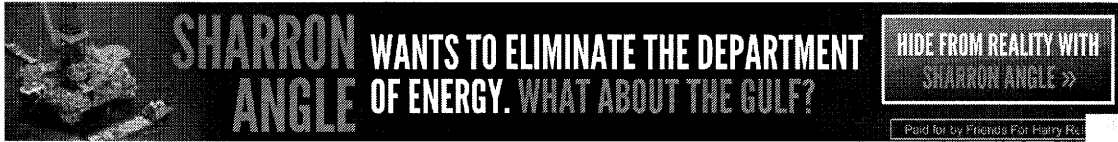


**U.S. SENATE RACE: Tea Party power fuels Angle**

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**pampango** (1000+ posts)

Thu May-13-10 02:57 PM  
 Original message

**U.S. SENATE RACE: Tea Party power fuels Angle**



Source: **Las Vegas Review-Journal**

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All three top GOP candidates are capable of beating Reid, according to previous polls that have shown the Democratic Party incumbent in an uphill battle to win a fifth Senate term on Nov. 2.

Read more: <http://www.lvrj.com/news/tea-party-power-fuels-angle-93...>

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There's no such thing as "the Tea Party"	Bryn	May-13-10 03:06 PM	#1
that's what nevada needs.... a f'ing conservative--- so much for the vegas hotel staff	happygoluckytoyou	May-13-10 03:21 PM	#2
Lowden is the Barter with Chickens one?	SoapBox	May-13-10 03:35 PM	#3

**Bryn** (1000+ posts)

Thu May-13-10 03:06 PM  
 Response to [Original message](#)

**1. There's no such thing as "the Tea Party"**



It's just a made up stuff by teabagger dirt group wasting away tea leaves.

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**happygoluckytoy** (1000+ posts)

Thu May-13-10 03:21 PM  
Response to [Original message](#)

**2. that's what nevada needs..... a f'ing conservative--- so much for the vegas hotel staff**



Edited on Thu May-13-10 03:21 PM by happygoluckytoy

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**SoapBox** (454 posts)

Thu May-13-10 03:35 PM  
Response to [Original message](#)

**3. Lowden is the Barter with Chickens one?**



Chickens anyone?

<http://lowdenplan.com/>

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**DU AdBot** (1000+ posts)

Fri Jul 23rd 2010, 04:05 PM  
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# EXHIBIT 4

# EXHIBIT 4

Type of Work: Text

Registration Number / Date:  
TX0007171977 / 2010-07-09

Application Title: Tea Party power fuels Angle.

Title: Tea Party power fuels Angle.

Appears in: Las Vegas Review-Journal, May 13, 2010

Description: Electronic file (eService)

Copyright Claimant:  
Righthaven LLC, Transfer: By written agreement.

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