

Crystal L. Cox
Pro Se Defendant
Pro Se Counter Plaintiff Crystal Cox
Case 2:12-cv-02040-GMN-PAL
SavvyBroker@yahoo.com

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
Case 2:12-cv-02040-GMN-PAL

Counter Plaintiff Crystal L. Cox

Counter Plaintiff Motion for Summary Judgement

v.

Counter Defendant Marc J. Randazza

Marc Randazza, personally and professionally,

Ronald Green, Randazza Legal Group,

Greenberg Traurig Law Firm,

Kenneth P. White,

Brown, White and Newhouse Law Firm,

Kashmir Hill of Forbes,

Forbes Inc., .

Godaddy Inc.,

Bob Parsons, Jessica Griffin, personally and professionally

Tonkon Torp Law Firm,

David S. Aman, Michael Morgan, Steven Wilker, personally and professionally,

Proskauer Rose Law Firm,

Kenneth Rubenstein, Allen Fagin, Gregg (Greggory) Mashberg, Jenifer DeWolf Paine, Joseph Lecsese, personally and professionally,

Obsidian Finance Group,

David W. Brown, Kevin D. Padrick, personally and professionally,

WIPO,

Francis Gurry, Erik Wilbers, personally and professionally,

Peter L. Michaelson, personally and professionally,

New York Times, David Carr,

Philly Law Blog, Philadelphia Business,

Jordan Rushie, personally and professionally, P

Leo M. Mulvihill, Jr.,

Mulvihill & Rushie, LLC,

SaltyDroid, Jason Jones Esq., personally and professionally

Janine Robben personally and professionally

Oregon State Bar Bulletin

Liberty Media Holdings,

John C. Malone, personally and professionally

Corbin Fisher, Business, Corporation,

XBIZ, California Business

Manwin, Business, Corporation, LUXEMBOURG, Montreal Canada, Los Angeles

Bob Garfield, personally and professionally

NPR, New York Public Radio,

Tracy L. Coenen personally and professionally

Sequencelnc.com, Wisconsin Company

Mark Bennett, personally and professionally

blog.bennettandbennett.com, Bennett and Bennett, Business

Scott H. Greenfield, Carlos Miller, John Calkins Sony, personally and professionally,

Eric Turkewitz, personally and professionally

Matthew M. Triggs, Personally and Professionally

Turkewitz Law Firm and NewYorkPersonalInjuryAttorneyBlog.com,

Scott H. Greenfield of Simple Justice - a New York Criminal Defense Blog and
blog.simplejustice.us, personally and professionally

Carlos Miller of PixIQ.com and PhotographyisNotaCrime.com, personally and professionally

Roxanne Grinage, personally and professionally, HireLyrics,

Sean Boushie, personally and professionally,

University of Montana, Montana

Royce Engstrom, Bernie Cassidy, Taylor Kai Groenke (Kai Groenke), personally and
professionally,

Martin Cain, Dylan Energy, personally and professionally, Maryland Individual, Maryland Business

APPLE, Corporation

Steve Dowling, Bruce Sewell, California, Doug Chey, Douglas D. Chey, personally and
professionally California

Tim Vawter, The Protection Group Video, personally and professionally

Judge Gloria M. Navarro personally and Professionally,

Daniel Staton Professional and Personally,

Marshall Ross Professional and Personally,

Multnomah County Sheriff's Office

Intel Corp. Oregon Business, California Business, Global Business

Steven Rodgers Vice President & Deputy General Counsel at Intel Corporation, Personally and Professionally.

Mark Vena, personally and professionally,

David Wang, personally and professionally,

Synaptics,

Bret Sewell, personally and professionally,

EDWARD KWAKWA, personally and professionally,

P. Stephen Lamont, personally and professionally,

Ari Bass - Michael Whiteacre, personally and professionally,

Sean Tompkins, personally and professionally,

Leo M. Mulvihill, Jr. Personally and Professionally,

Mulvihill & Rushie LLC,

Free Speech Coalition,

Diana Duke, Personally and Professionally,

Note To Court: This Court has repeatedly DENIED requests to sign a conflict of Interest Disclosure, though requested several times by Pro Se Defendant / Pro Se Counter Plaintiff Crystal L. Cox. Any action forward by Judge Gloria M. Navarro or Judge Peggy A. Leen, who refuses to admit/deny conflicts and rules forward will be charged with Obstruction of Justice through conflicts of interest, violations of attorney and judicial cannons in order to Deny Due Process via aiding and abetting the alleged civil and criminal conspiracy through Fraud on the Court.

I, Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox intend to file criminal complaints against any officer of the court, including opposing counsel, who violates any law or ethical statues in order to perpetrate the fraud through obstruction via conflicts, or has violated any law already in previous rulings affecting me, Pro Se Defendant, Pro Se Counter Defendant Crystal Cox.

Therefore every ruling of this court on a motion without conflict disclosure will be charged for each and every act a in a criminal complaint, forthcoming.

Judge Gloria Navarro is alleged by Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox to be acting in criminal and civil conspiracy with Plaintiff / Counter Defendant Marc J. Randazza and ALL Connected Co-Conspirators and Counter Defendants of District of Nevada Case 2:12-cv-02040-GMN-PAL and therefore this court has a duty to notify all applicable authorities, bond carriers, insurance carriers, AND State and Federal Auditors of the liability of this allegation in a Federal Court Proceeding.

Pro Se Counter Plaintiff Crystal Cox respectfully moves the Court for summary judgment on all claims raised in Counter Plaintiffs' Amended Complaint.

Counter Defendants have not disputed the facts of Counter Plaintiff's Claim, and therefore this court should grant immediate Summary Judgement to Pro Se Counter Plaintiff Crystal Cox.

This motion is made pursuant to Rule 56 of the Federal Rules of Civil Procedure and is based upon the following information and attached Memorandum, as well as all documents, motions of this case.

Counter Defendant Marc Randazza filed a harassing retaliation Lawsuit against Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox in order silence my blogs, steal intellectual property, defame me and intimidate me.

Counter Defendant / Plaintiff Marc J. Randazza used his power and access to the courts to file a lawsuit against a Blogger that he did not like, to retaliate against this Investigative Blogger and to SILENCE blogs, information online that was reporting on him and his clients, of which he did not approve of.

Counter Defendant / Plaintiff Marc J. Randazza had once negotiated allegedly on behalf of this blogger, Counter Plaintiff / Defendant Crystal Cox, me, in my best interest, acting as my Attorney, according to others in the First Amendment Bar, and then a year later he uses his power to BULLY me, to retaliate against me and sue Counter Plaintiff / Defendant Crystal Cox and Defendant Eliot Bernstein in order to suppress information regarding the iViewit Story, and STOP the flow of information on my Anti-Corruption Investigative Blogs.

Counter Defendant / Plaintiff Marc J. Randazza filed this lawsuit on November 28th, 2012. Counter Defendant / Plaintiff Marc J. Randazza is represented in this matter by an attorney from his own law firm Ronald D. Green, who once worked with Greenberg Traurig, a Co-Conspirator in the iViewit Technology Case. Both Counter Defendant / Plaintiff Marc J. Randazza and Ronald D. Green, as Well As Counter Defendant Jordan Rushie, represent Liberty Media Holdings.

Liberty Media Holdings, companies they own, are named in the iViewit Technology, Founded by Eliot Bernstein, SEC and RICO Complaints, and they are currently infringing on the iViewit Video Technology and have been for over a decade. Undisclosed to shareholders, Liberty Media Holdings, this represents 100's of Billions of Dollars in Liability to Liberty Media Holdings and companies they own.

Also on November 28th, 2012, Counter Defendant / Plaintiff Marc J. Randazza filed a Ex Parte Motion for Temporary Injunction in order to Seize Domain Names, Remove Online Content, Get a Gag Order Against Blogger Crystal Cox, Delete Blogs and Remove massive content, and thousands of inner links.

In this Ex Parte Motion for Temporary Injunction, Counter Defendant / Plaintiff Marc J. Randazza via his attorney Ronald D. Green, they defamed Defendant Crystal Cox and Defendant Eliot Bernstein. They lied to the courts, they submitted blog posts of their co-conspirators as alleged evidence, they falsified information, and the courts believed them, they were eventually granted this motion, in total violation of the constitutional rights and due process of law rights of Counter Plaintiff / Defendant Crystal Cox and Defendant Eliot Bernstein.

Counter Defendant / Plaintiff Marc J. Randazza filed both Complaint / Lawsuit and Ex Parte Motion for Temporary Injunction on the same day of November 28th, 2012. They did not bother to even try and serve Counter Plaintiff / Defendant Crystal Cox and Defendant Eliot Bernstein, either of these documents. Instead they used their connections to their Co-Conspirators, Counter Defendants, who are Big Media, Forbes, NPR, New York Times, Lawyer Bloggers, Fraud Bloggers, and other Co-Conspirators and they posted the Lawsuit against Counter Plaintiff / Defendant Crystal Cox and Defendant Eliot Bernstein everywhere to Defame, Disgrace, Humiliate, Paint In False Light, Threaten, Harass, Intimidate and Ruin the Businesses of Counter Plaintiff / Defendant Crystal Cox and Defendant Eliot Bernstein.

These Co-Conspirators, Counter Defendants, as well as Counter Defendant / Plaintiff Marc J. Randazza are sources of legal information to the mass public, they are believed. They are big media, they are lawyers and they used their power and position to disgrace, humiliate, defame, intimidate, and paint in false light regarding Counter Plaintiff / Defendant Crystal Cox and Defendant Eliot Bernstein and had not even served them. It is my belief that they never did intend to serve us this complaint, they simply wanted the Ex Parte Motion for Temporary Injunction GRANTED, so they could wipe to blogs out, remove online content from search engines, seize massive domain names and redirect them, and all without due process or First Amendment Adjudication.

Having not been served this lawsuit and seeing the Search Engines, the Blogs, Big Media and Small Media reporting on the lawsuit, I, Counter Plaintiff / Defendant Crystal Cox found out, contacted the courts and served myself so that I could fight back against the massive defamation and defend myself in the search engines and on the court docket.

Counter Defendant / Plaintiff Marc J. Randazza used the court docket to defame me, and did not even serve me, nor notify me in any way. Having Been my Attorney for a short time, he knew my eMail, he knew my phone number, and he intentionally did not let me know I was being sued, and thereby give me due process of LAW Before he spread his version of the case far and wide.

I, Counter Plaintiff / Defendant Crystal Cox, finally, formally accepted serves via mail to the courts, and responded to the Ex Parte Motion for Temporary Injunction, as well as filed a Motion for Electronic Access on December 10th 2012. Counter Defendant / Plaintiff Marc J. Randazza having a disadvantage, was able to file quickly and with as much evidence as he wanted. I had not even got a chance to file a response to the complaint before they moved forward with an unconstitutional Preliminary Injunction (Ex Parte Motion for Temporary Injunction), in which removed my online content, thousands of links, deleted blogs, changed servers of Domain Names, and GAVE my intellectual property and that of Defendant Eliot Bernstein to Counter Defendant / Plaintiff Marc J. Randazza without First Amendment Adjudication and without Due Process of Law.

This court should award Defendant / Counter Plaintiff Crystal L. Cox, Summary Judgement, Damages, Actual and Punitive Damages in all causes, issues of this case.

Pro Se Counter Plaintiff Crystal Cox should be granted Summary Judgement In Regard to Cause of Action Number 1.) Criminal and Civil Conspiracy; Title 18, U.S.C., Section 241 - Conspiracy Against Rights, Title 18, U.S.C., Section 242 - Deprivation of Rights Under Color of Law, Title 18, U.S.C., Section 245 - Federally Protected Activities, Provisions against Conspiracies to Interfere with Civil Rights (42 U.S.C. § 1985), Section 241 of Title 18 is the civil rights conspiracy statute, Conspiracy Against Rights, 18 U.S.C. § 241. Section 241 of Title 18

Counter Defendant Marc Randazza and Co-Conspirators, Counter Defendants clearly conspired against the rights of Counter Plaintiff / Defendant Crystal Cox and caused irreparable harm.

Counter Defendant Marc Randazza and Co-Conspirators, Counter Defendants have deprived Counter Plaintiff / Defendant Crystal Cox of her rights under the color of law.

Counter Defendant Marc Randazza and Co-Conspirators, Counter Defendants have interfered with Counter Plaintiff / Defendant Crystal Cox's Federally Protected Activities such as her First Amendment Rights, Free Speech Rights, Freedom of Expression Rights, and have acted in conspiracy against these rights.

Therefore, this court should grant Counter Plaintiff / Defendant Crystal Cox a Summary Judgement.

See Memorandum to Counter Plaintiff Summary Judgement Request / Motion for more Details on this Issue.

This court should award Defendant / Counter Plaintiff Crystal L. Cox, Summary Judgement, Damages, Actual and Punitive Damages in all causes, issues of this case.

**Pro Se Counter Plaintiff Crystal Cox should be granted Summary Judgement In
Regard to Cause of Action Number 2 Defamation**

Counter Defendant Marc Randazza and Co-Conspirators, Counter Defendants have clearly and blatantly Defamed Counter Plaintiff / Defendant Crystal Cox. And clearly with malice. This court should grant Counter Plaintiff / Defendant Crystal Cox Summary Judgement regarding defamation, as Counter Defendant Marc Randazza and, Co-Conspirators, Counter Defendants cannot claim Gertz v. Robert Welch, Inc., 418 U.S. 323 (1974) or Times V. Sullivan as a Defense, because they had actual malice, they had actual knowledge of the facts and intentionally defamed, ruined, disgraced Counter Plaintiff / Defendant Crystal Cox by accusing her, me of a Federal Crime in massive publications. When I, Counter Plaintiff / Defendant Crystal Cox am not guilty of extortion, have not had due process of law regarding the accusation of extortion, have not been under public investigation for extortion, have not been on trial for extortion, nor have I or Defendant Eliot Bernstein been convicted of Extortion.

Yet, Counter Defendant Marc Randazza and Counter Defendants, Co-Conspirators, knowingly posted, broadcast, and published in widespread international media of all kinds that I, Counter Plaintiff / Defendant Crystal Cox and Defendant Eliot Bernstein are guilty of Extortion, are in fact Extortionist, when again this is NOT True.

Counter Defendant Marc Randazza, especially, has actual malice, as he spoke with me in regards to my case Obsidian Finance Group V. Crystal Cox, and we spoke of the Extortion Allegation, plus he acted as my attorney and negotiated on my behalf, if he thought I was guilty of a crime it was his lawful ethical duty to discuss this with me, and it certainly was not lawful to publicly accuse a former client of EXTORTION, just to retaliate against her, seek revenge and ruin, he my life.

Counter Defendant Marc Randazza and Counter Defendants, Co-Conspirators have Defamed me, with actual malice and have ruined my life, my livelihood, my quality of life, my personal, business, and religious relationships

In order for Counter Defendant Marc Randazza and Counter Defendants, Co-Conspirators to prevail in a trial on the merits of Defamation Law, they have to prove that I, Counter Plaintiff / Defendant Crystal Cox and Defendant Eliot Bernstein have been convicted in a court of law for the crime of Extortion. As Counter Defendant Marc Randazza and, Co-Conspirators broadcast, published world wide, that Counter Plaintiff / Defendant Crystal Cox and Defendant Eliot Bernstein were guilty of Extortion.

There is no way for Counter Defendant Marc Randazza and Counter Defendants, Co-Conspirators to prove this and therefore Summary Judgement should be granted to Counter

Plaintiff Crystal Cox.

Extortion is a crime, it is not an Opinion for a group of Lawyers, WIPO Panelists, WIPO Publications, High Profile Media such as Forbes, NPR and the New York Times, Fraud Investigation Blogs and other blogs of the Counter Defendant Marc Randazza and Counter Defendants, Co-Conspirators, to widely state as fact that Counter Plaintiff / Defendant Crystal Cox and Defendant Eliot Bernstein are guilty of the Crime of Extortion. This is not protected by the First Amendment, the UDRP Policies, the WIPO Policies or the Laws of the United States. This is malicious, intentional defamation to torment in gang up people that Counter Defendant Marc Randazza and Counter Defendants, Co-Conspirators simply do not like, disagree with, and want to SILENCE their Investigative Reporting.

This court should send a clear message to all Big Media, Attorneys, Blogs, Law Firms, WIPO Panelist that this behavior will not be tolerated, and immediately grant Summary Judgement in favor of Counter Plaintiff Crystal Cox.

Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants knowingly made false statements, that were knowingly defamatory, and I, Counter Plaintiff / Defendant Crystal Cox was irreparable harm, and I am entitled to recovery.

There were false statements made. Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants knowingly made these false statements. They were defamatory, they were published, and they harmed me Counter Plaintiff / Defendant Crystal Cox. Therefore I am entitled to recover, to compensation.

I, Counter Plaintiff / Defendant Crystal Cox am entitled to compensation, and should be granted a Summary Judgement in regard to the Second Claim / Cause of Defamation.

Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants were negligent in knowingly posting false and defamatory information about Counter Plaintiff / Defendant Crystal Cox, and therefore I am entitled to recovery.

"The Truth" is an absolute defense against charges of libel in defamation cases. However, there is no way possible for Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants to find evidence that proves that Counter Plaintiff / Defendant Crystal Cox and Defendant Eliot Bernstein have been prosecuted for the the Crime of Extortion. Therefore, this court should grant Summary Judgement to Counter Plaintiff / Defendant Crystal Cox. There is no way to prove TRUTH in this matter, as it does not exist.

Therefore, this court should grant Counter Plaintiff / Defendant Crystal Cox a Summary Judgement.

"The Truth" is an absolute defense against charges of libel, against Defamation.

The TRUTH is that Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox and Defendant Eliot Bernstein have not been convicted of the Crime Extortion, nor have Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox and Defendant Eliot Bernstein EVER been on Trial for the Crime of Extortion, nor have Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox and Defendant Eliot Bernstein been under documented, public investigation for the Crime Extortion. Yet Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators and Counter Defendants have publicly broadcast that Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox and Defendant Eliot Bernstein are guilty of the Crime Extortion. This has caused irreparable damage to Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox and Defendant Eliot Bernstein and has put Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox and Defendant Eliot Bernstein in danger, deliberately, with actual malice.

It is an Absolute Fact that Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox and Defendant Eliot Bernstein have not been prosecuted for the Crime Extortion. Therefore, Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators and Counter Defendants have no way of proving "The Truth" as an absolute defense in their widespread, criminal endangerment, defamation and libel by publicly stating in mass media, radio, newspapers, blogs and more that Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox and Defendant Eliot Bernstein are Extortionists, are Guilty of Extortion. Therefore this court should immediately grant Summary Judgement against Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators and Counter Defendants.

Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators and Counter Defendants had actual malice as most of them are Attorneys, Fraud Investigators, Reporters, Journalist, Bloggers and they have easy access and know how, in researching the TRUTH, as to the matter of Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox and Defendant Eliot Bernstein being Extortionists, or being Guilty of Extortion. Therefore, Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators and Counter Defendants had actual malice, actual knowledge that they were defaming, printing, speaking, broadcasting, publishing defamatory information regarding Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox and Defendant Eliot Bernstein. Therefore Times Vs. Sullivan (New York Times Co. v. Sullivan, 376 U.S. 254 (1964)) does not protect Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators and Counter Defendants from Defamation Liability. Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators and Counter Defendants knew beyond a reasonable doubt that they were printing, publishing, speaking, broadcasting information they knew was wholly and patently false, regarding Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox and Defendant Eliot Bernstein.

Plaintiff / Counter Defendant Marc Randazza especially had Actual Malice, and Knowledge of Facts as he was the attorney, legal counsel for Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox.

Gertz v. Robert Welch, Inc., 418 U.S. 323 (1974), also does not protect Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators and Counter Defendants from claims of defamation, as it is certainly not an opinion if a Party has been prosecuted for the Crime of Extortion or Not. It is a Fact. A Fact that is easily found by Attorneys, Investigators, NPR, Journalists, Reporters, Judges, WIPO Investigators and Fraud Investigators such as Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators and Counter Defendants are.

Therefore, this court should grant Counter Plaintiff / Defendant Crystal Cox a Summary Judgement.

See Memorandum to Counter Plaintiff Summary Judgement Request / Motion for more Details on this Issue.

This court should award Defendant / Counter Plaintiff Crystal L. Cox, Summary Judgement, Damages, Actual and Punitive Damages in all causes, issues of this case.

Pro Se Counter Plaintiff Crystal Cox should be granted Summary Judgement In Regard to Cause of Action Number 3.) Harassment, All Federal and State Harassment Laws Applicable, 47 USC § 223 , ALL Anti-discrimination laws, all laws relating that prohibit harassment against individuals in retaliation...

Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants have harassed Pro Se Counter Plaintiff / Pro Se Defendant Crystal Cox, posted hate and threats against Pro Se Counter Plaintiff / Pro Se Defendant Crystal Cox, sent harassing texts to Pro Se Counter Plaintiff / Pro Se Defendant Crystal Cox, and have constantly harassed Pro Se Counter Plaintiff / Pro Se Defendant Crystal Cox in retaliation of her online posts reporting on Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants and the biggest technology crime in the world, iViewit and the involvement of co-conspirators.

Pro Se Counter Plaintiff / Pro Se Defendant Crystal Cox has been discriminated against by Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants and this court should grant a summary judgement to Pro Se Counter Plaintiff / Pro Se Defendant Crystal Cox.

This court should award Defendant / Counter Plaintiff Crystal L. Cox, Summary Judgement, Damages, Actual and Punitive Damages and all in this case.

Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendant's continued harassment campaign, constant threats, harassment, and intimidation had cause massive, irreparable harm to Defendant / Counter Plaintiff Crystal L. Cox therefore, this court should grant Counter Plaintiff / Defendant Crystal Cox a Summary Judgement.

See Memorandum to Counter Plaintiff Summary Judgement Request / Motion for more Details on this Issue.

This court should award Defendant / Counter Plaintiff Crystal L. Cox, Summary Judgement, Damages, Actual and Punitive Damages in all causes, issues of this case.

Pro Se Counter Plaintiff / Pro Se Defendant Crystal Cox should be granted Summary Judgement In Regard to Cause of Action Number 4.) Violation of Anti-Trust Violations / Fair Trade Violations Fair Competition Act (FCA), The Federal Sherman Antitrust Act (1890), Antitrust Policy and Competition Law

Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants using their power and influence over the courts to corner the market on search terms related to their industry and their names, violates Fair Trade Laws and Anti-Trust Laws.

They have effectively created a monopoly whereby they are the only ones allowed to use certain search terms, this is manipulating the free market.

They have suppressed my ability to compete in the search engines by using the courts to stop me from competing. This violates anti-trust laws and fair competition laws

Therefore, this court should grant Counter Plaintiff / Defendant Crystal Cox a Summary Judgement.

See Memorandum to Counter Plaintiff Summary Judgement Request / Motion for more Details on this Issue.

This court should award Defendant / Counter Plaintiff Crystal L. Cox, Summary Judgement, Damages, Actual and Punitive Damages in all causes, issues of this case.

Pro Se Counter Plaintiff Crystal Cox should be granted Summary Judgement In Regard to Cause of Action Number 5.) Violation of First Amendment Right, Constitutional Rights, Freedom of Expression, Article 19 of the Universal Declaration of Human Rights, Bill of Rights 1689, First Amendment Adjudication Laws and Constitutional Rights,

Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants have clearly Violated the First Amendment Rights, Freedom of Expression, Article 19 of the Universal Declaration of Human Rights, Bill of Rights 1689, First Amendment Adjudication Laws and Constitutional Rights and have caused irreparable harm in doing so.

The First Amendment does not protect Counter Defendant / Plaintiff Marc J. Randazza and somehow exclude Pro Se Counter Plaintiff / Defendant Crystal Cox and Eliot Bernstein.

Counter Defendant / Plaintiff Marc J. Randazza sued Pro Se Counter Plaintiff / Defendant Crystal Cox and Eliot Bernstein simply to take away their constitutional rights. Counter Defendant / Plaintiff Marc J. Randazza sued to remove domain names, blogs, content from the Internet Search Engines and Counter Defendant / Plaintiff Marc J. Randazza was granted an unconstitutional, unlawful prior restraint / preliminary injunction against Pro Se Counter Plaintiff / Defendant Crystal Cox and Eliot Bernstein, which allowed Counter Defendant / Plaintiff Marc J. Randazza to illegally and unconstitutionally remove massive online content, delete entire blogs, remove gripe sites, remove bad reviews, remove parody, remove sites that made fun of him, remove sites that reporting on him and his clients, and to simply TAKE Domain names and change the servers, all without DUE PROCESS of Law and First Amendment Adjudication.

This has cause irreparable harm to Pro Se Counter Plaintiff / Defendant Crystal Cox and therefore this court should grant Summary Judgement to Pro Se Counter Plaintiff / Defendant Crystal Cox.

Counter Defendant / Plaintiff Marc J. Randazza Sued Pro Se Counter Plaintiff / Defendant Crystal Cox and Eliot Bernstein for exercising their First Amendment Rights, and this is unlawful and unconstitutional, therefore this court should grant Summary Judgement to Pro Se Counter Plaintiff / Defendant Crystal Cox.

Under the Constitution, prior restraints are the most serious and least tolerable infringements of First Amendment Rights, N.Y. Times Co. v. U.S., 403 U.S. 713, 714, (1971), Bernard v. Gulf Oil Co. Yet, Counter Defendant / Plaintiff Marc J. Randazza used his power and privilege as a Nevada Attorney to get a Prior Restraint, a Preliminary Injunction in which enabled Counter Defendant / Plaintiff Marc J. Randazza to wipe out massive online content owned by Pro Se Counter Plaintiff / Defendant Crystal Cox, and to simply steal and redirect massive domain names belonging to Pro Se Counter Plaintiff / Defendant Crystal Cox and Eliot Bernstein. All without due process of law or First Amendment Adjudication. This has caused damage to Pro Se Counter Plaintiff / Defendant Crystal Cox and Eliot Bernstein that cannot be undone, therefore this court should grant Summary Judgement to Pro Se Counter Plaintiff / Defendant Crystal Cox.

State of Nevada Case 2:12-cv-02040-GMN-PAL is a Violation of Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox and Defendant Eliot Bernstein's First Amendment Rights and therefore this court should award Defendant / Counter Plaintiff Crystal L. Cox, Summary Judgement, Damages, Actual and Punitive Damages in all causes, issues of this case.

State of Nevada Case 2:12-cv-02040-GMN-PAL is a Violation of Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox and Defendant Eliot Bernstein's First Amendment Rights, Freedom of Speech, Freedom of Expression (Article 19 of the Universal Declaration of Human Rights and recognized in international human rights law in the International Covenant on Civil and Political Rights (ICCPR). Article 19 of the ICCPR) and a Violation of our Civil Rights, Due Process Rights, Intellectual Property Rights, and is a Conspiracy Against Rights, 18 U.S.C. § 241. Section 241 of Title 18, and Conspiracy to Interfere with Civil Rights (42 U.S.C. § 1985), and a Title 18, U.S.C., Section 242 **Deprivation of Rights Under Color of Law Violation of Law and the Legal, Constitutional Rights of** Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox and Defendant Eliot Bernstein.

State of Nevada Case 2:12-cv-02040-GMN-PAL is a Violation of Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox and Defendant Eliot Bernstein's rights according to the **Bill of Rights** 1689 which granted 'freedom of speech in Parliament' and the Declaration of the Rights of Man and of the Citizen, adopted during the French Revolution in 1789, specifically affirmed freedom of speech as an inalienable right. The Declaration provides for freedom of expression in Article 11, which states that:

"The free communication of ideas and opinions is one of the most precious of the rights of man. Every citizen may, accordingly, speak, write, and print with freedom, but shall be responsible for such abuses of this freedom as shall be defined by law."

Article 19 of the Universal Declaration of Human Rights, adopted in 1948, states that:

"Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers."

The World Summit on the Information Society (WSIS) Declaration of Principles adopted in 2003 makes specific reference to the importance of the right to freedom of expression for the "Information Society" in stating:

"We reaffirm, as an essential foundation of the Information society, and as outlined in Article 19 of the Universal Declaration of Human Rights, that everyone has the right to freedom of opinion and expression; that this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers. Communication is a fundamental social process, a basic human need and the foundation of all social organisation. It is central to the Information Society. Everyone, everywhere should have the opportunity to participate and no one should be excluded from the benefits of the Information Society offers."

Therefore, this court should grant Counter Plaintiff / Defendant Crystal Cox a Summary Judgement.

See Memorandum to Counter Plaintiff Summary Judgement Request / Motion for more Details on this Issue.

This court should award Defendant / Counter Plaintiff Crystal L. Cox, Summary Judgement, Damages, Actual and Punitive Damages in all causes, issues of this case.

Pro Se Counter Plaintiff Crystal Cox should be granted Summary Judgement In Regard to Cause of Action Number 6.) Violation of Due Process /Denial of Due Process, International Covenant on Civil and Political Rights (ICCPR). Article 19 of the ICCPR) and a Violation of our Civil Rights, Due Process Rights, and ALL State and Federal Due Process Laws Applicable

Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants have used official court access to violate the rights of Defendant / Counter Plaintiff Crystal L. Cox and Eliot Bernstein, and without due process of law or constitutional rights adjudication allowed for Defendants.

Defendant / Counter Plaintiff Crystal L. Cox and Eliot Bernstein have been DENIED Civil Rights, Due Process Rights, and Due Process of Law as all documents, motions, responses, evidence and reply's in this matter clearly show.

This court should award Defendant / Counter Plaintiff Crystal L. Cox, Summary Judgement, Damages, Actual and Punitive Damages in all causes, issues of this case.

Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants have repeatedly committed Fraud on the Courts, and seem to have special privilege because the Plaintiff in this case and an attorney.

Plaintiff Marc Randazza has committed fraud on this court as he knows full well what Obsidian Finance Group v. Cox was about, as Plaintiff Marc Randazza had a phone meeting with Defendant Crystal Cox regarding the Obsidian Finance Group v. Cox Case and representing me on that case, as it was a Free Speech Issue.

On Belief and Knowledge of Counter Plaintiff Crystal Cox, This Court has Denied Counter Plaintiff Crystal L. Cox Due Process and erred when it issued an impermissible prior restraint when it issued a preliminary injunction against future speech, and seized intellection property, content, blogs and domain names of Counter Plaintiff Crystal Cox.

This Court has Denied Counter Plaintiff Crystal L. Cox Due Process and erred when it issued a preliminary injunction against tortious interference, when as a matter of law, the tortious interference claim must fail. **Counter-Defendant** Marc Randazza has tortiously interfered with Counter Plaintiff Crystal Cox's business, news media, blogs, and online content.

This Court has Denied Counter Plaintiff Crystal L. Cox Due Process and erred when it issued a preliminary injunction in which has caused irreparable harm, when there was an adequate remedy at law, when there was no likelihood of success on the merits, and without considering the public interest?

This Court has Denied Counter Plaintiff Crystal L. Cox Due Process and erred when it issued a preliminary injunction against invasion of privacy without the requisite showings required to enter a preliminary injunction.

This Court By Law must cure an unlawful prior restraint and therefore should grant Counter Plaintiff Crystal L. Cox a Summary Judgement.

Counter-Defendant Marc Randazza sued Counter Plaintiff Crystal Cox for Exercising her First Amendment Rights

This Court has Denied Defendant Crystal Cox Due Process and erred when it issued a preliminary injunction that was over-broad, subject to abuse and has caused Counter Plaintiff Crystal Cox irreparable financial damage and suffering.

This Court has Denied Counter Plaintiff Crystal L. Cox Due Process and erred when it issued a preliminary injunction denying Defendant Crystal Cox her right to Free Speech.

The essence of a prior restraint is that it places First Amendment protected speech under the personal censorship of one judge. (Bernard v. Gulf Oil Co., 619 F.2d 459, 486 (5th Cir. 1980) (State v. Globe Commc'ns, Corp., 622 So.2d 1066, 1073, (Fla. 4th DCA 1993), aff'd 648 So. 2d 110 (Fla. 1994)

This Court has Denied Counter Plaintiff Crystal L. Cox Due Process and erred when it issued an unlawful prior restraint. Such an injunction imposed unlawful prior restraint of speech, violating the First Amendment, with no constitutionally permissible justification. The Order represents an impermissible restraint on speech and was unjustified based on the evidence. The injunction is a content based restriction on speech, and thus must overcome strict scrutiny in order to stand. There is no "compelling state interest" at issue in this case. The injunction has a fatal condition. (Bantam Books, Inc. v. Sullivan 372 U.S. 58 (1963) (Organization for a Better Austin v. Keefe, 402 U.S. 415 (1971) The Supreme Court Struck down the injunction as "an impermissible restraint on First Amendment rights" Id at 417018, 418 n.l. In invalidating the prior restraint, the Court wrote, "no prior decisions support the claim that the interest of an individual in being free from public criticism of his business practises in pamphlets, or leaflets warrants the injunctive power of the court." Id at 419.

The Preliminary Injunction in this Case against Counter Plaintiff Crystal L. Cox is Unconstitutional.

If a court issues an injunction prior to adjudicating the First Amendment Protection of the speech at issue, the injunction cannot pass constitutional muster.

This court denied Counter Plaintiff Crystal L. Cox Due Process in expressly skipping the essential step of adjudicating the First Amendment protections to the speech at issue.

This court denied Counter Plaintiff Crystal L. Cox Due Process in failing to make any findings of fact or ruling of law, much less review of the blog articles and the First Amendment.

Counter-Defendant Marc Randazza is a Public Figure. (New York Times Vs. Sullivan)

A Judicial Order that prevents free speech from occurring is unlawful. (Erwin Chemerinsky, Constitutional Law; Principles and Policies 918 (2002) ("The Clearest definition of prior restraint is.. a judicial order that prevents speech from occurring:).

Prior Restraints are “the most serious and least tolerable infringement on First Amendment Rights.” *Neb. Press Ass’n v. Stewart*, 427 U.S. 539, 559 (1976). There is a “deep-seated American hostility to prior restraint” *Id* at 589 (Brennan, J. concurring).

Injunctive relief to prevent actual or threatened damage is heavily disfavored because it interferes with the First Amendment and amounts to censorship prior to a judicial determination of the lawlessness of speech. See *Moore v. City Dry Cleaners & Laundry*, 41 So. 2d 865, 872 (Fla. 1949). “The special vice of prior restraint,” the Supreme Court held, “is that communication will be suppressed... before an adequate determination that it is unprotected by the First Amendment”. *Pittsburgh Press Co v. Pittsburg Comm’n on Human Relations*, 413 U.S. 376, 390 (1973). Also see *Fort Wayne Books Inc. v Indiana*, 489 U.S. 46, 66 (1989); *M.I.C., Ltd v Bedford Township*, 463 U.S. 1341, 11343 (1983.)

In this case, the Nevada Court has skipped the step of adjudicating the First Amendment protection relevant to the speech at issue. Prior Restraints are Unconstitutional.

Also see *Post-Newsweek Stations Orlando, Inc. v. Guetzlo*.

“RKA sought extraordinary relief in the form of prior restraint to enjoin .. . This relief is not recognized in this State, nor anywhere else in the Country. In addition to ignoring the First Amendment Rights and almost a century’s worth of common law, the .. court ignored virtually all procedural requirements for the issue of a preliminary injunction.” Page 5 Paragraph ii of Opening Brief Appellate Case No. 3D12-3189, Irina Chevaldina Appellant vs. R.K./FI Management Inc.;et.al., Appellees. Attorney for Appellant Marc J. Randazza Florida Bar No. 325566, Randazza Legal Group Miami Florida.

Therefore, this court should grant Counter Plaintiff / Defendant Crystal Cox a Summary Judgement.

See Memorandum to Counter Plaintiff Summary Judgement Request / Motion for more Details on this Issue.

This court should award Defendant / Counter Plaintiff Crystal L. Cox, Summary Judgement, Damages, Actual and Punitive Damages in all causes, issues of this case.

Pro Se Counter Plaintiff Crystal Cox should be granted Summary Judgement In Regard to Cause of Action Number 7.) Violation of Hate Crime Act, Hate Crime Prevention Act, Title 18, U.S.C., Section 241, Conspiracy Against Rights Statute, Title 18, U.S.C., Section 249 - Matthew Shepard and James Byrd, Jr., Hate Crimes Prevention Act

Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants continue to conspire to others to aunt, harass, intimidate, defame, pressure, and constantly put Pro Se Defendant / Counter Plaintiff Crystal L. Cox under duress.

Co-Conspirator Sean Tompkins threatens to come to the down Pro Se Defendant / Counter Plaintiff Crystal L. Cox lives in and "bye bye" to me. Sean Tompkins constantly attacks me online and threatens to harm me.

Counter Defendant / Plaintiff Marc J. Randazza threatened if I did not turn over domain names he demanded, he would make an enemy of my. Counter Defendant / Plaintiff Marc J. Randazza threatened one of my sources Monica Foster. Counter Defendant / Plaintiff Marc J. Randazza has repeatedly harassed one of my sources, whistleblower Stephanie DeYoung.

Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants have put my life under massive duress and constant threats and attack therefore this court should grant me summary judgement regarding Hate Crimes against me, Pro Se Defendant / Counter Plaintiff Crystal L. Cox interfering with my quality of life and ability to function and run my business.

Co-Conspirator Sean Boushie is believed to be in contact with Marc Randazza. Sean Boushie is a University of Montana Employee who illegally impersonates me online, constantly taunts me, CC, defames me, intimidates me and puts me under extreme duress. Sean Boushie has conspired with David Aman of Tonkon Torp Law Firm in regard to Obsidian Finance Group V. Crystal Cox.

David Aman of Tonkon Torp Law Firm, Opposing Counsel discussed Sean Boushie in court documents. I, Pro Se Defendant / Counter Plaintiff Crystal L. Cox, filed a motion to exclude Sean Boushie of the University of Montana from my Oregon Trial. Judge Marco Hernandez excluded Sean Boushie and claimed to be calling for an FBI investigation as court Transcripts show, in regard to Sean Boushie intimidating a Federal Witness. Sean Boushie is doing the Same thing in this Nevada case and impersonating me, Pro Se Defendant / Counter Plaintiff Crystal L. Cox in the process.

Marc J. Randazza of Randazza Legal Group is believed to be in contact with Sean Boushie, getting and giving him information and conspiring with Sean Boushie to taunt, harass, intimidate, defame, pressure, and constantly put Pro Se Defendant / Counter Plaintiff Crystal L. Cox under duress.

Therefore, this court should grant Counter Plaintiff / Defendant Crystal Cox a Summary Judgement.

See Memorandum to Counter Plaintiff Summary Judgement Request / Motion for more Details on this Issue.

This court should award Defendant / Counter Plaintiff Crystal L. Cox, Summary Judgement, Damages, Actual and Punitive Damages in all causes, issues of this case.

Pro Se Counter Plaintiff Crystal Cox should be granted Summary Judgement In Regard to Cause of Action Number 8.) Abuse of Process.

Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants have abused the process of the courts and this has caused Pro Se Defendant / Counter Plaintiff Crystal L. Cox irreparable harm and duress, therefore this court should award Pro Se Defendant / Counter Plaintiff Crystal L. Cox regarding the abuse or process to take away my rights to due process, my first amendment rights, my intellectual property, my lifes work, my quality of life, all taken because Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants have abused the legal process.

Counter Defendant / Plaintiff Marc J. Randazza used his power and access to the courts to file a lawsuit against a Blogger that he did not like, to retaliate against this Investigative Blogger and to SILENCE blogs, information online that was reporting on him and his clients, of which he did not approve of.

Counter Defendant / Plaintiff Marc J. Randazza had once negotiated allegedly on behalf of this blogger, Counter Plaintiff / Defendant Crystal Cox, me, in my best interest, acting as my Attorney, according to others in the First Amendment Bar, and then a year later he uses his power to BULLY me, to retaliate against me and sue Counter Plaintiff / Defendant Crystal Cox and Defendant Eliot Bernstein in order to suppress information regarding the Viewit Story, and STOP the flow of information on my Anti-Corruption Investigative Blogs.

Counter Defendant / Plaintiff Marc J. Randazza filed this lawsuit on November 28th, 2012. Counter Defendant / Plaintiff Marc J. Randazza is represented in this matter by an attorney from his own law firm Ronald D. Green, who once worked with Greenberg Traurig, a Co-Conspirator in the iViewit Technology Case. Both Counter Defendant / Plaintiff Marc J. Randazza and Ronald D. Green, as Well As Counter Defendant Jordan Rushie, represent Liberty Media Holdings.

Liberty Media Holdings, companies they own, are named in the iViewit Technology, Founded by Eliot Bernstein, SEC and RICO Complaints, and they are currently infringing on the iViewit Video Technology and have been for over a decade. Undisclosed to shareholders, Liberty Media Holdings, this represents 100's of Billions of Dollars in Liability to Liberty Media Holdings and companies they own.

Also on November 28th, 2012, Counter Defendant / Plaintiff Marc J. Randazza filed a Ex Parte Motion for Temporary Injunction in order to Seize Domain Names, Remove Online Content, Get a Gag Order Against Blogger Crystal Cox, Delete Blogs and Remove massive content, and thousands of inner links.

In this Ex Parte Motion for Temporary Injunction, Counter Defendant / Plaintiff Marc J. Randazza via his attorney Ronald D. Green, they defamed Defendant Crystal Cox and Defendant Eliot Bernstein. They lied to the courts, they submitted blog posts of their co-conspirators as alleged evidence, they falsified information, and the courts believed them, they were eventually granted this motion, in total violation of the constitutional rights and due process of law rights of Counter Plaintiff / Defendant Crystal Cox and Defendant Eliot Bernstein.

Counter Defendant / Plaintiff Marc J. Randazza filed both Complaint / Lawsuit and Ex Parte Motion for Temporary Injunction on the same day of November 28th, 2012. They did not bother to even try and serve Counter Plaintiff / Defendant Crystal Cox and Defendant Eliot Bernstein, either of these documents. Instead they used their connections to their Co-Conspirators, Counter Defendants, who are Big Media, Forbes, NPR, New York Times, Lawyer Bloggers, Fraud Bloggers, and other Co-Conspirators and they posted the Lawsuit against Counter Plaintiff / Defendant Crystal Cox and Defendant Eliot Bernstein everywhere to Defame, Disgrace, Humiliate, Paint In False Light, Threaten, Harass, Intimidate and Ruin the Businesses of Counter Plaintiff / Defendant Crystal Cox and Defendant Eliot Bernstein.

These Co-Conspirators, Counter Defendants, as well as Counter Defendant / Plaintiff Marc J. Randazza are sources of legal information to the mass public, they are believed. They are big media, they are lawyers and they used their power and position to disgrace, humiliate, defame, intimidate, and paint in false light regarding Counter Plaintiff / Defendant Crystal Cox and Defendant Eliot Bernstein and had not even served them.

It is my belief that they never did intend to serve us this complaint, they simply wanted the Ex Parte Motion for Temporary Injunction GRANTED, so they could wipe to blogs out, remove online content from search engines, seize massive domain names and redirect them, and all without due process or First Amendment Adjudication.

Having not been served this lawsuit and seeing the Search Engines, the Blogs, Big Media and Small Media reporting on the lawsuit, I, Counter Plaintiff / Defendant Crystal Cox found out, contacted the courts and served myself so that I could fight back against the massive defamation and defend myself in the search engines and on the court docket.

Counter Defendant / Plaintiff Marc J. Randazza used the court docket to defame me, and did not even serve me, nor notify me in any way. Having Been my Attorney for a short time, he knew my eMail, he knew my phone number, and he intentionally did not let me know I was being sued, and thereby give me due process of LAW Before he spread his version of the case far and wide.

I, Counter Plaintiff / Defendant Crystal Cox, finally, formally accepted serves via mail to the courts, and responded to the Ex Parte Motion for Temporary Injunction, as well as filed a Motion for Electronic Access on December 10th 2012. Counter Defendant / Plaintiff Marc J. Randazza having a disadvantage, was able to file quickly and with as much evidence as he wanted. I had not even got a chance to file a response to the complaint before they moved forward with an unconstitutional Preliminary Injunction (Ex Parte Motion for Temporary Injunction), in which removed my online content, thousands of links, deleted blogs, changed servers of Domain Names, and GAVE my intellectual property and that of Defendant Eliot Bernstein to Counter Defendant / Plaintiff Marc J. Randazza without First Amendment Adjudication and without Due Process of Law.

Therefore, this court should grant Counter Plaintiff / Defendant Crystal Cox a Summary Judgement.

See Memorandum to Counter Plaintiff Summary Judgement Request / Motion for more Details on this Issue.

This court should award Defendant / Counter Plaintiff Crystal L. Cox, Summary Judgement, Damages, Actual and Punitive Damages in all causes, issues of this case.

**Pro Se Counter Plaintiff Crystal Cox should be granted Summary Judgement In
Regard to Cause of Action Number 9.) Title 11 of United States Code, 11 U.S.C.
§101-1330, All Laws applying to Tortious Interference**

Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants have constantly interfered with my ability to do business. Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants have communicated to the public of whom I need to make a living, that I have been convicted of Extortion. They repeatedly call me an Extortionist and therefore tortiously interfere with my ability to make a living.

Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants have interfered with my ability to have Prospective Business. They constantly defame me and email people, companies to paint me in false light and ruin my chances of prospective business. Co-Conspirators have damaged my 13 year Brokers License by falsifying information, defaming me and flat out lying.

Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants have constantly interfered with my ability to do business. Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants have communicated to the public of whom I need to make a living, that I have been convicted of Extortion. They repeatedly call me an Extortionist and therefore tortiously interfere with my ability to make a living.

Counter-Defendant Marc Randazza and Co-Conspirators and Counter Defendants
Have Interfered with Counter Plaintiff Crystal Cox's Prospective Business Advantage.

Counter Plaintiff Crystal Cox has owned Ten Lakes Realty for 12 years, and has been the managing broker as well. Other than co-conspirators, Counter-Defendants, as listed above, Ten Lakes Realty has a Good Reputation, and was a successful Real Estate Company. Counter-Defendant Marc Randazza and Co-Conspirators and Counter Defendants have defamed Counter Plaintiff Crystal Cox, accused Counter Plaintiff Crystal Cox and Defendant Eliot Bernstein of the Crime of Extortion broadcast in mass media. Counter Plaintiff Crystal Cox has been publicly defamed and therefor has lost potential business, clients and advantages.

Counter Plaintiff Crystal Cox is a successful Investigative Blogger providing deep research to CEO's, Investigation Firms, Private Parties, Bankruptcy Creditor and More. Now due to the lies, defamation, fraudulent accusations and painting in false light, Counter-Defendant Marc Randazza and Co-Conspirators and Counter Defendants, the business of Counter Plaintiff Crystal Cox Investigative Blogger has come to a standstill.

Counter Plaintiff Crystal Cox has a successful Nutritional Marketing Business Online and makes a living selling nutritional supplements. Counter-Defendant Marc Randazza and Co-Conspirators and Counter Defendants have Interfered with Counter Plaintiff Crystal Cox's Prospective Business Advantage in this regard.

Counter Plaintiff Crystal Cox is an author and publisher, and my credibility is key in selling eBooks, Photos, and more. Counter-Defendant Marc Randazza and Co-Conspirators and Counter Defendants have Interfered with Counter Plaintiff Crystal Cox's Prospective Business Advantage.

Counter Plaintiff Crystal Cox is an online media, search engine expert and Counter-Defendant Marc Randazza and Co-Conspirators and Counter Defendants have Interfered with Counter Plaintiff Crystal Cox's Prospective Business Advantage.

Counter Plaintiff Crystal Cox is Doing Business as CRYSTAL COX CONSULTING, CRYSTAL COX MEDIA, CRYSTAL COX NEWS, CRYSTAL COX PRESS, CRYSTAL COX PUBLISHING, REVEREND CRYSTAL COX, Nakaii Publishing, Ten Lakes Realty.

Counter Plaintiff Crystal L. Cox has suffered irreparable damage personally and professionally. Wherefore, Counter Plaintiff Crystal L. Cox demands a judgment against Each Co-Conspirator, Each Counter Defendant for actual and punitive damages, and all other relief allowable under the law and federal court rules.

By painting Counter Plaintiff Crystal L. Cox in false light, defaming her, accusing her of Extortion of which there is no prosecution or trial record of, Counter-Defendant Marc Randazza and Co-Conspirators and Counter Defendants have Interfered with Counter Plaintiff Crystal Cox's Prospective Business Advantage.

Therefore, this court should grant Counter Plaintiff / Defendant Crystal Cox a Summary Judgement.

See Memorandum to Counter Plaintiff Summary Judgement Request / Motion for more Details on this Issue.

This court should award Defendant / Counter Plaintiff Crystal L. Cox, Summary Judgement, Damages, Actual and Punitive Damages in all causes, issues of this case.

Pro Se Counter Plaintiff Crystal Cox should be granted Summary Judgement In Regard to Cause of Action Number 12) Malpractice, Uniform Commercial Code, Nevada Malpractice Laws, California Malpractice Laws, Washington Malpractice Laws, Montana Malpractice Laws, Negligence, Client Confidentiality, Punitive Damages, The Lawyer's Code of Professional Responsibility, Rules of Professional Conduct, Attorney Misconduct Laws.

Counter Defendant / Plaintiff Marc J. Randazza and Counter Defendants Ronald Green and Randazza Legal Group, were involved in the Obsidian V. Cox Cox. Counter Defendant / Plaintiff Marc J. Randazza received privileged information, negotiated deals, told members of the First Amendment Bar that he represented CC and was negotiating a deal, then when Defendant / Counter Plaintiff Crystal L. Cox fired Counter Defendant / Plaintiff Marc J. Randazza and chose UCLA Professor Eugene Volokh to represent her, Counter Defendant / Plaintiff Marc J. Randazza set out on a never ending campaign of hate, retaliation, defamation, intimidation and harassment.

Counter Defendant / Plaintiff Marc J. Randazza had been apparently negotiating a deal with Opposing Counsel on behalf of Defendant / Counter Plaintiff Crystal L. Cox that would Prevent Defendant / Counter Plaintiff Crystal L. Cox from continuing to the Ninth Circuit. Counter Defendant / Plaintiff Marc J. Randazza had convinced me, Defendant / Counter Plaintiff Crystal L. Cox, that it may be in the best interest of the Greater Good if I, Defendant / Counter Plaintiff Crystal L. Cox, were to not appeal. I later found out that Counter Defendant / Plaintiff Marc J. Randazza had misled me, and was negotiating a deal NOT in my best interest and without discussing the details of the deal with me, ccc, the Defendant in Obsidian V. Cox.

Counter Defendant / Plaintiff Marc J. Randazza seemed to have the goal, all along to keep me from appealing Obsidian Finance Group V. Crystal Cox to the Ninth Circuit Court.

Counter Defendant / Plaintiff Marc J. Randazza sabotaged his own client, and then a year later sued Defendant / Counter Plaintiff Crystal L. Cox, in retaliation. This court should award Defendant / Counter Plaintiff Crystal L. Cox, Summary Judgement, Damages, Actual and Punitive Damages and all in this case.

Counter Defendant / Plaintiff Marc J. Randazza has sued me, harassed Defendant / Counter Plaintiff Crystal L. Cox, lied about me in international publications, defamed me to big media and massive bloggers and all after he was an attorney who had negotiated on my behalf. This court should award me, Defendant / Counter Plaintiff Crystal L. Cox summary judgement for the massive irreparable harm, damage and duress that Counter Defendant / Plaintiff Marc J. Randazza has done to me.

Counter Defendant / Plaintiff Marc Randazza told me Defendant / Counter Plaintiff Crystal L. Cox, that if I did not GIVE him the Domain Name he wanted, he would make me an ENEMY. Now that's Extortion and he sure did follow through. Counter Defendant / Plaintiff Marc Randazza has RUINED my life, with ACTUAL MALICE, actual knowing of the Facts of the Matter.

Counter Defendant / Plaintiff Marc Randazza used his privileged position to cause harm to Defendant / Counter Plaintiff Crystal L. Cox, and to Defendant Eliot Bernstein.

Counter Defendant / Plaintiff Marc Randazza stating to WIPO that Defendant / Counter Plaintiff Crystal L. Cox and Defendant Eliot Bernstein had extorted him, were guilty of Extortion, with NO PROOF, caused massive, irreparable harm to the reputation of Defendant / Counter Plaintiff Crystal L. Cox, and to Defendant Eliot Bernstein AND directly interfered, intentionally with the credibility of the iViewit Technology Case. The WIPO publication broadcast that Defendant / Counter Plaintiff Crystal L. Cox, and to Defendant Eliot Bernstein were Guilty of Extortion, in International WIPO Publication, Legal Publications and from there it is now on massive blogs and media outlets. All because of the intentional false, defamatory information, with actual malice from Counter Defendant / Plaintiff Marc Randazza

Therefore, this court should grant Counter Plaintiff / Defendant Crystal Cox a Summary Judgement.

See Memorandum to Counter Plaintiff Summary Judgement Request / Motion for more Details on this Issue.

This court should award Defendant / Counter Plaintiff Crystal L. Cox, Summary Judgement, Damages, Actual and Punitive Damages in all causes, issues of this case.

Pro Se Counter Plaintiff Crystal Cox should be granted Summary Judgement In Regard to Cause of Action Number 13) Retraction Laws, Nevada Retraction Laws, NRS §41.336(2). NRS §41.337. and ALL Nevada Retraction Laws

Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants did not ask Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox to remove blogs posts or specific domain names, as per Nevada Retraction Laws. Counter Defendant / Plaintiff Marc J. Randazza legally has to ask for a retraction before he can sue regarding online posts, domain names, and published content.

Counter Defendant / Plaintiff Marc J. Randazza used his power over the courts to simply WIN, to delete blogs, online content, blog posts, and redirect domain name servers thereby causing massive damage to Pro Se Counter Plaintiff Crystal Cox and without asking for a retraction. Therefore this court should award summary judgement to Pro Se Counter Plaintiff Crystal Cox in regard to Nevada Retraction Laws.

Therefore, this court should grant Counter Plaintiff / Defendant Crystal Cox a Summary Judgement.

See Memorandum to Counter Plaintiff Summary Judgement Request / Motion for more Details on this Issue.

This court should award Defendant / Counter Plaintiff Crystal L. Cox, Summary Judgement, Damages, Actual and Punitive Damages in all causes, issues of this case.

Pro Se Counter Plaintiff Crystal Cox should be granted Summary Judgement In Regard to Cause of Action Number 14) Shield Laws, Nevada Shield Law NRS 49.275

It is a violation of Nevada Shield Laws to Deny a Journalist, Investigative Blogger, Media Defendant, to Report on One Law Firm Specifically, One Last Name, One Attorney. It is also Unconstitutional and violates the First Amendment, Freedom of Expression and the rights of due process, as a matter of law.

Counter Defendant / Plaintiff Marc J. Randazza, aided by this court, and other Co-Conspirators, removed massive blogs and online content from Media Defendant / Counter Plaintiff Crystal Cox without due process of law, and with total disregard for Shield laws and the First Amendment, therefore this court should grant Defendant / Counter Plaintiff Crystal Cox a Summary Judgement in this matter.

This Nevada Court, per Nevada Shield Laws, did not consider the media implications, the news factor, the Free Speech issues at stake BEFORE granting an injunction in which enabled Counter Defendant / Plaintiff Marc J. Randazza to delete blogs, removed massive content, redirect domain names, steal intellectual property and therefore wipe out massive online reporting of Defendant / Counter Plaintiff Crystal Cox in regard to Marc Randazza, Co-Conspirators and the iViewit Technology Story.

The Nevada Shield Laws are to protect news media representatives, as I clearly am, and to insure the free flow of information. Yet Counter Defendant / Plaintiff Marc J. Randazza simply wiped out my "news media" outlets with an unlawful, unconstitutional Preliminary Injunction.

The Nevada Shield Laws ensure the public's right to know about important issues.

Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants are connected to Big Media Companies, Porn Companies, Appeal Court Cases, and other major public issues that the public has a right to know about.

Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants are allegedly connected to prostitution rings, organized crime, PornWikiLeaks.com, Mike South aKa Michael Thomas Strother who is connect to NASA, Tara Akinlose Alleged to be Running PornWikiLeaks.com, gang stalking, Internet Mobbing, and more in which Defendant / Counter Plaintiff Crystal Cox was reporting on, and the public has a right to the free flow of information regarding Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants.

PornWikiLeaks.com is a serious matter, as it outs Porn Stars and their children and families, Counter Defendant Marc Randazza and Co-Conspirators, Counter Defendants is somehow behind / connected to or protecting PornWikiLeaks.com or protecting those who is are running the site

It is unlawful, unconstitutional and against the Nevada Shield Laws to STOP the free flow of information regarding one man, one law firm, one last name, and to simply wipe out blogs, media in which report on issues, people, attorneys, companies that Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants don't approve of. It is unconstitutional for this court to have allowed for massive blog posts to be removed, deleted, and domain names moved, servers changed and irreparable damage done by Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants.

Therefore this court should grant Defendant / Counter Plaintiff Crystal Cox a Summary Judgement in this matter.

Therefore, this court should grant Counter Plaintiff / Defendant Crystal Cox a Summary Judgement.

See Memorandum to Counter Plaintiff Summary Judgement Request / Motion for more Details on this Issue.

This court should award Defendant / Counter Plaintiff Crystal L. Cox, Summary Judgement, Damages, Actual and Punitive Damages in all causes, issues of this case.

Pro Se Counter Plaintiff Crystal Cox should be granted Summary Judgement In Regard to Cause of Action Number 15) Cause of Action 1512 : US Code - Section 1512: Tampering with a witness, victim, or an informant

Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants have harassed Defendant / Counter Plaintiff Crystal L. Cox and tried to prevent me from appealing to the Ninth Circuit in another case.

Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants have pressured Defendant / Counter Plaintiff Crystal L. Cox and put me under constant duress, in order to tamper with, intimidate me to back off from my rights.

Counter Defendant / Plaintiff Marc J. Randazza has tampered with, harassed witness, victim, or an informant Stephanie DeYoung and Monica Foster aKa Alexandria Melody.

This has caused direct harm to the legal cases of Defendant / Counter Plaintiff Crystal L. Cox. **Therefore, this court should grant Counter Plaintiff / Defendant Crystal Cox a Summary Judgement.**

See Memorandum to Counter Plaintiff Summary Judgement Request / Motion for more Details on this Issue.

This court should award Defendant / Counter Plaintiff Crystal L. Cox, Summary Judgement, Damages, Actual and Punitive Damages in all causes, issues of this case.

Pro Se Counter Plaintiff Crystal Cox should be granted Summary Judgement In Regard to Cause of Action Number 17.) Whistleblower Retaliation. Whistleblower Retaliation Protections Laws, Whistleblower Protection Act, Whistleblower Protection Enhancement Act was introduced in 2009, all Federal and State Whistle Blower Retaliation Laws.

Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants sued me to retaliate against a whistleblower. As my blogs were blowing the whistle on Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants, and Plaintiff used this lawsuit to retaliate, cause me massive stress and financial pressure me. Whistleblower Retaliation Protections Laws, Whistleblower Protection Act, Whistleblower Protection Enhancement Act was introduced in 2009, all Federal and State Whistle Blower Retaliation Laws.

Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators / Counter Defendants have engaged in **Whistleblower Retaliation regarding** Counter Plaintiff Crystal L. Cox, and her sources.

Counter Plaintiff Crystal L. Cox has blown the whistle on the organized crime, technology infringement, gang stalking, fraud on the courts, trademark law abuse, copyright trolling, activities and actions of Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators / Counter Defendants and they have retaliated and thereby caused irreparable harm and suffering to Counter Plaintiff Crystal L. Cox and Defendant Eliot Bernstein, who has been drug into this case and into Obsidian Finance Group vs. Crystal Cox, in civil and criminal conspiracy to discredit and suppress the iViewit Technology Theft Story involving Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators / Counter Defendants and their clients.

Counter Plaintiff Crystal L. Cox has blown the whistle on Defendant Marc Randazza and Co-Conspirators / Counter Defendant's attorney ring / gang using big media, radio, blogs, news outlets to create a desired outcome in each others court cases.

Therefore, this court should grant Counter Plaintiff / Defendant Crystal Cox a Summary Judgement.

See Memorandum to Counter Plaintiff Summary Judgement Request / Motion for more Details on this Issue.

This court should award Defendant / Counter Plaintiff Crystal L. Cox, Summary Judgement, Damages, Actual and Punitive Damages in all causes, issues of this case.

Pro Se Counter Plaintiff Crystal Cox should be granted Summary Judgement In Regard to Cause of Action Number 18.) False Claims Act (31 U.S.C. §§ 3729–3733.

Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators / Counter Defendants have violated the The False Claims Act (31 U.S.C. §§ 3729–3733, also called the "Lincoln Law") is an American federal law that imposes liability on persons and companies (typically federal contractors) who defraud governmental programs. The court is a Gov program

The most commonly used of these provisions are the first and second, prohibiting the presentation of false claims to the government and making false records to get a false claim paid.

Plaintiff / Counter Defendant Marc Randazza claims to be a trademark attorney, domain attorney, free speech attorney, anti-SLAPP attorney, yet has proven the exact opposite in this Nevada SLAPP Suit against an investigative reporter / investigative journalist exposing him and his co-conspirators.

Plaintiff / Counter Defendant Marc Randazza and Co-Conspirators / Counter Defendants have defrauded the courts by creating fictional court cases, and using each others blogs and media to create "legal commentary" that makes it look like they are telling the facts, and thereby lead to them winning the case. As in Counter Plaintiff Crystal Cox's case, the Judge stated that legal commentary proved what the Plaintiff said, and the legal commentary used as alleged evidence to steal my life's work, my intellectual property and to defame, harass and endanger me, Counter Plaintiff Crystal Cox and Defendant Eliot Bernstein was actually blogs of their clients, co-conspirators and reporters that they once represented in cases. They ALL conspire to falsely claim certain alleged facts in court cases (government programs) in order to trick judges, courts into ruling in their favor. When these "legal commentary" as Judge Gloria Navarro calls it, is not based in documented fact of any kind. THIS IS MAKING A FALSE RECORD IN A GOVERNMENT PROGRAM TO GET A FALSE CLAIM PAID.

Therefore, this court should grant Counter Plaintiff / Defendant Crystal Cox a Summary Judgement.

See Memorandum to Counter Plaintiff Summary Judgement Request / Motion for more Details on this Issue.

This court should award Defendant / Counter Plaintiff Crystal L. Cox, Summary Judgement, Damages, Actual and Punitive Damages in all causes, issues of this case.

**Pro Se Counter Plaintiff Crystal Cox should be granted Summary Judgement In
Regard to Cause of Action Number 19.) Consumer Protection Act, Deceptive Trade
Practices and Consumer Protection Act.**

Counter Plaintiff Crystal L. Cox was a client, consumer of Randazza Legal Group, Plaintiff / Counter Defendant Marc Randazza. Counter Plaintiff Crystal L. Cox was a client, consumer that had a VERY bad, unlawful and unethical experience with her attorney Randazza Legal Group, Plaintiff / Counter Defendant Marc Randazza. Counter Plaintiff Crystal L. Cox has a right to use the name "Randazza" in Gripe Sites, Parody Sites, Review Sites, and Blogs that warn the public, and share her personal experience regarding Randazza Legal Group, Plaintiff / Counter Defendant Marc Randazza. And to share information she has found or has been sent to her, in order to protect other possible consumers.

Counter Defendant / Plaintiff Marc J. Randazza and Co-Conspirators, Counter Defendants does not have a lawful right to remove bad reviews, and use the power of the court to simply ERASE consumers experience, opinion of them.

Yet, that is what Counter Defendant / Plaintiff Marc J. Randazza has done.

Therefore, this court should grant Counter Plaintiff / Defendant Crystal Cox a Summary Judgement.

See Memorandum to Counter Plaintiff Summary Judgement Request / Motion for more Details on this Issue.

This court should award Defendant / Counter Plaintiff Crystal L. Cox, Summary Judgement, Damages, Actual and Punitive Damages in all causes, issues of this case.

Pro Se Counter Plaintiff Crystal Cox should be granted Summary Judgement In Regard to Cause of Action Number 16) Racketeering, 18 USC Chapter 96 - RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS, Code number 1961 through 1968. All Racketeering Laws Applicable RICO 11) RICO US Code Title 18, USAM 9-110.000 Organized Crime and Racketeering

Counter Defendant Marc Randazza and Co-Conspirators, Counter Defendants are clearly acting in conspiracy to shut down the blogs, Anti-Corruption Media of Counter Plaintiff / Defendant Crystal Cox, of Defendant Eliot Bernstein in order to SILENCE the iViewit Story, which is the story of the biggest technology theft in the world and involves clients of Counter Defendant Marc Randazza and involves many of the Co-Conspirators, Counter Defendants themselves.

The wasteful conduct of Counter Defendant Marc Randazza and, Co-Conspirators, Counter Defendants has gone to far, and a Summary Judgement should be granted to Counter Plaintiff Crystal L. Cox. Counter Defendant Marc Randazza and Co-Conspirators, Counter Defendants have conspired in a pattern and history way that has directly damaged, caused irreparable harm to Counter Plaintiff / Defendant Crystal Cox, **therefore, this court should grant Counter Plaintiff / Defendant Crystal Cox a Summary Judgement.**

See Memorandum to Counter Plaintiff Summary Judgement Request / Motion for more Details on this Issue.

This court should award Defendant / Counter Plaintiff Crystal L. Cox, Summary Judgement, Damages, Actual and Punitive Damages in all causes, issues of this case.

Therefore, this court should grant Counter Plaintiff / Defendant Crystal Cox a Summary Judgement.

See Memorandum to Counter Plaintiff Summary Judgement Request / Motion for more Details on this Issue.

This court should award Defendant / Counter Plaintiff Crystal L. Cox, Summary Judgement, Damages, Actual and Punitive Damages in all causes, issues of this case.

Counter Plaintiff Pray for the Following Relief

1.)

10 Million Awarded to Counter Plaintiff / Defendant Crystal Cox For Malpractice and Neglect Causing Counter Plaintiff / Defendant Crystal Cox irreparable harm.

10 Million Awarded to Counter Plaintiff / Defendant Crystal Cox For Criminal Endangerment, and Tortious Interference Causing Counter Plaintiff / Defendant Crystal Cox irreparable harm.

10 Million Awarded to Counter Plaintiff / Defendant Crystal Cox For Conspiring with others to taunt Counter Plaintiff / Defendant Crystal Cox, threaten, paint in false light, harass, and thereby Cause Counter Plaintiff / Defendant Crystal Cox irreparable harm.

10 Million Awarded to Counter Plaintiff / Defendant Crystal Cox For Intentional, Harmful Defamation with actual knowledge of the Facts. Counter Defendant Marc Randazza and, Co-Conspirators, Counter Defendants knew that Counter Plaintiff / Defendant Crystal Cox, and Defendant Eliot Bernstein had never been on trial for, investigated for or convicted of the Crime of Extortion, yet they heavily broadcast in Big Media, Respected Blogs, Attorney Blogs in their Gang, NPR, Forbes, WIPO Publications and more, that Counter Plaintiff / Defendant Crystal Cox, and Defendant Eliot Bernstein were guilty of the crime of extortion. This has caused irreparable damage to Counter Plaintiff / Defendant Crystal Cox, and Defendant Eliot Bernstein

10 Million Awarded to Counter Plaintiff / Defendant Crystal Cox For Damage to my online Anti-Corruption, Whistleblower media, in deleting content, redirecting domain names, removing blogs, without due process, and without First Amendment Adjudication. This damage to my online media can NOT be undone.

10 Million Awarded to Counter Plaintiff / Defendant Crystal Cox For Damage to my future clients, as I make a living online, and Counter Defendant Marc Randazza and, Co-Conspirators, Counter Defendants have convinced the public at large that I am guilty of the crime of Extortion of which I have never had a criminal complaint, never been on trial for and certainly have not been convicted of.

20 Million Dollars Awarded to Counter Plaintiff / Defendant Crystal Cox for Damage to my 13 years Real Estate Brokerage, no falling apart in reputation due the actions, defamation, gang stalking, hate crimes and conspiracy of Counter Defendant Marc Randazza and, Co-Conspirators, Counter Defendants.

50 Million Awarded to Counter Plaintiff / Defendant Crystal Cox for duress, punitive damage, of over a year of constant fear, hiding, moving, and stress trying to stay alive and trying to do any kind of business due to threats, intimidation, taunts, harassment, defamation, hate crimes and torments of Counter Defendant Marc Randazza and, Co-Conspirators, Counter Defendants.

2.) Counter Defendant has no right to requested domain names. Counter Plaintiff / Defendant Crystal Cox wishes all domain names be returned to Crystal Cox and Eliot Bernstein Permanently.

marcrandazza.me
marcrandazza.com
marcjrandaazza.com
fuckmarcrandazza.com
marcjohnrandazza.com
marcrandazzasucks.com
marcrandazzaisalyingasshole.com
marcrandazza.biz
marcrandazza.info
marcrandazza.mobi
marcrandazzaparody.com
exposemarcrandazza.com
randazzalegalgroupsucks.com
trollmarcrandazza.com
hypocritemarcrandazza.com
crystalcoxmarcrandazza.com

marcrandazza.com
marcrandazza.me
marcrandazza.info
marcrandazza.biz
marcrandazza.org

Marc Randazza has not proven a Trademark on those domain names and has no greater right to own them then I do. If so then Godaddy should be made to compensate domain owners, as they SOLD names that were illegal to sell.

- 3.) a Permanent Injunction against Counter Defendant Marc Randazza and Co-Conspirators, Counter Defendants from talking about me on their blogs, making videos about Counter Plaintiff / Defendant Crystal Cox, publishing anything regarding Counter Plaintiff / Defendant Crystal Cox whatsoever.
4. That this court give me all domain names used by Counter Defendant Marc Randazza and Co-Conspirators, Counter Defendants us to publish hate against Counter Plaintiff / Defendant Crystal Cox. Counter Defendant Marc Randazza defames Counter Plaintiff / Defendant Crystal Cox, such as Crystal-Cox.com, CrystalCoxBlows.com, CrystalCoxSucks.com and all google accounts, tumblr accounts wordpress accounts and other accounts used to taunt, defame, intimidate, and harass Counter Plaintiff / Defendant Crystal Cox.
- 5.) That All videos made by Counter Defendant Marc Randazza and Co-Conspirators, Counter Defendants, inciting hate against Counter Plaintiff / Defendant Crystal Cox are permanently deleted
- 6.) That Counter Defendant Marc Randazza and Co-Conspirators, Counter Defendants is permanently given an injunction to never publish a word regarding Counter Plaintiff / Defendant Crystal Cox.
- 7.) That Counter Defendant Marc Randazza and Co-Conspirators, Counter Defendants publish a retraction regarding accusing his ex-client Crystal L. Cox of Extortion. This includes admitting to WIPO that he told them fraudulent information.
- 8.) That WIPO publish a retraction regarding accusing Crystal Cox and Eliot Bernstein of Extortion. And compensate 10 Million dollars for irreparable damages to Counter Plaintiff / Defendant Crystal Cox from WIPO.
- 9.) Counter Defendant Marc Randazza and Co-Conspirators, Counter Defendants be given a permanent restraining order, protective order requiring them to NOT call, text, email, attack threaten, photo, drive by my house, follow me, or come near me or my known sources in any way.
- 10.) That Counter Plaintiff Receive recover for irreparable damages caused by Counter Defendant Marc Randazza and Co-Conspirators, Counter Defendants.
- 11.) That Counter Plaintiff be awarded pre- and post-judgment interest to the maximum extent allowed by law;
12.) That Counter Plaintiff be awarded such and other further relief to which they may be justly entitled;

13.) That Counter Defendant Marc Randazza and Co-Conspirators, Counter Defendants be permanently enjoined from blogging, buying domain names, starting tumble accounts, google accounts, wordpress accounts, youTube accounts in the name of Crystal Cox or to specifically defame, harass, taunt, intimidate Crystal Cox and that all in existence be deleted, removed.

14.) That Counter Defendant Marc Randazza and Co-Conspirators, Counter Defendants be permanently enjoined from tormenting my clients, potential clients and interfering with my ability to do business or making a living

15. That Counter Defendant Marc Randazza and Co-Conspirators, Counter Defendants RETRACT all accusations of Extortion against Crystal Cox and Eliot Bernstein.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed using this Court's CM/ECF system
On February 16th 2013.

Respectfully Submitted
Pro Se Defendant
Pro Se Counter Plaintiff Crystal Cox
Crystal L. Cox
Case 2:12-cv-02040-GMN-PAL