IN THE UNITED STATES COURT FOR THE WESTERN DISTRICT OF ARKANSAS

Curtis J Neeley Jr., MFA **Plaintiff**

v

CASE NO. 12-5208

Federal Communications Commission,
Microsoft Corporation,
Google Inc. **Defendants**

SUPPLEMENTAL OPPOSITION TO DOCKET #16 "MOTION TO DISMISS" BY Google Inc.

1. The Amended Complaint should not fail but could be better written. Plaintiff alleged a reckless disregard for the truth as well as listing three other "*flavors*" of common law privacy supported in Arkansas. Plaintiff feels his own past creations of naked female images should not be publicly available to minors. This feeling is shared by Congress and most citizens in the United States. *See* 47 USC §231.

2. Plaintiff once published naked images at <redbubble.com> and and <deviantart.com> for sale with identity filtration implemented to comply with the intentions of 47 USC §231. Plaintiff never gave "*Creative Commons Licenses*" for any of these naked images, as was fraudulently alleged by Google Inc Counselors in docket #35 to MISLEAD THIS DISTRICT COURT.

3. The indecent naked images have since been withdrawn from these **two third-party computers,** where they were offered for sale, due to violations of Plaintiff's private choice to proscribe the anonymous by Defendant Google Inc.

4. This right to control original speech was made fundamental by the First Amendment and violations of this right per 17 USC §107 re-sampling of "*WEB*-speech" uninvited are how Google Inc created ridiculous profit via unfair "*fair-uses*" and re-selling original creations of others. Google Inc wishes now to export unfair "*fair-use*" practice from "*online*" or the "*WEB*" to libraries in New York and asserted this "*fair-use*" abuse against this Plaintiff now here.

5. This short supplemental brief entirely eviscerates dockets ## (35, 36, 37). Docket. #35, ironically, **self-eviscerates** and this portion is highlighted as follows.

> Unlike the claims against some of the other parties in that lawsuit, all of the claims against Google **other than the "invasion of privacy" claim** were dismissed on res judicata grounds, which can only be with prejudice.

6. Plaintiff questions Defendant Google Inc Counselor's **misquoting this Court** in docket 36 ¶5 regarding the Plaintiff placing artwork into some imaginary "*public domain*" location called [sic] ("*internet*"). Google Inc Counselors abused the District Court's prior misuse of the common slang term for interconnected computers in a network [sic]("*internet*") This slang described searches for Plaintiff's name on Google Inc's **private** database. This is often referred to as the singular slang term of [sic]("*internet*") inappropriately due to this database or free speech violations being harvested from other remote computers referring to the source computer to justify 17 USC §107 re-sampling. The United States' "*fair-use*" abuse can't be exported as Google Inc recently learned in Europe in the Paris guilty verdict now ignored.

7. The term "*INTER + NET*" is not suitable for usage in any legal filings as a singular noun. **They** realized this after reading the response in docket #35 III ¶3. This slang usage is worse than the indirect pronoun in the prior sentence meaning every lawyer on Earth who reads along with Defendant Google Inc and Microsoft Corporation lawyers as well as this District Court.

8. Plaintiff placed naked female figure images for sale on **TWO private computers** connected to unregulated common carrier wires and was unaware that Google Inc would then bypass identity requirements and display these naked female images to unidentified minors or others refusing to provide verifiable identity to whom these images would otherwise be invisible. These naked female figure images were deleted by the Plaintiff because of Defendant Google Inc violating Plaintiff's First Amendment right to unabridged "*Free Speech*".

9. Plaintiff then placed "ideologically sensitive anti-Google" images on ONE of these computers and these "ideologically sensitive anti-Google" images then returned in searches for the Plaintiff's name limited to this ONE computer attached to unregulated common carrier wires until Google Inc personnel ("*hackers*") decided to no longer display these "ideologically sensitive anti-Google" images perhaps to support stock purchases or other "hacker" frustrations.

10. Plaintiff measured Google Inc's *mysterious* ability to decide what to return for searches for "curtis neeley" for demonstrative purposes and to better demonstrate for the JURY the improper scienter needed to award 11.6 billion in exemplary damages from Defendant Google Inc. The "ideologically sensitive anti-Google" images returned for weeks then disappeared and reappeared because Google Inc "hackers" were fooled into committing *hari kari.*

11. Google Inc wishes every computer connected to the interstate and international network of wires, often called "*INTER*" + "*NET*", to become the second improper singular slang contraction for two items used in US law to violate the fundamental human right to free speech. The first inappropriate uses of a singular contraction for two terms in the United States law has been "*COPY*" and "*RIGHT*" for centuries. Plaintiff hopes to never allow "*INTER*" + "*NET*" to join this other utterly inappropriate singular slang term in United States law.

12. Plaintiff has unequaled knowledge regarding the development of both slang terms "*INTER*" + "*NET*" and "*COPY*" + "*RIGHT*" and how these two inappropriate uses of language are interrelated in the United States. This research is far beyond any yet done. Plaintiff will provide a scholarly thesis or book providing input collected from dozens of noted constitutional law professors as well as details from four centuries of written history with footnotes if the District Court requests and can complete this shortly after the thirty day extension now requested by the Federal Communications Commission. This doctoral thesis is warranted because this litigation will begin to end the existence of inappropriate pervasive distant communications by simultaneous wire and radio communications on Earth and begin United States' recognition that unabridged "*Free Speech*" requires exclusive author's control of original speech republication by the rule of laws.

13. Each Defendant "Motions to Dismiss" revealed not considering this new complaint in the least. The offer to provide further frivolous briefings seeking dismissal in docket #35 was inappropriate as well as the advisement to this District Court that *res judicata* dismissals are all prejudicial as is obvious even to *pro se* parties.

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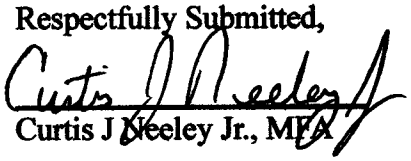
Respectfully Submitted,



Curtis J Neeley Jr., MFA

CERTIFICATE OF SERVICE

I, Curtis J. Neeley Jr., MFA, do hereby certify that I filed the forgoing personally. The District Clerk will scan this and make it accessible via CM/ECF. Furthermore; every docket entry of Neeley Jr v FCC et al, (5:12-cv-5208) will be accessible by wire communications perpetually including a free mirror of the District Court Docket with freely provided electronic copies of every filing. The docket will be updated within 24-hours after any paper is filed by Neeley and can be accessed from the following UnRegulated Locations. (URLs)

1. **CurtisNeeley.com/FCC/Neeley-Jr_v_FCC-et-al.htm**
2. **CurtisNeeley.com/FCC/New_GOOG_exhibits**
3. **CurtisNeeley.com/FCC/New_MSFT_exhibits**

URL #1 is the mirror of the Docket. URL #2 is the password protected directory with access to all exhibit files prepared that are not accessible at URL #3. The username for logging in is "adult" and the password is "YeS" and proper case is required. These PDFs are often indecent or obscene and all access is logged.

Curtis J Neeley Jr. MFA