

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
FAYETTEVILLE DIVISION**

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| CURTIS J. NEELEY JR., | § | |
| | § | |
| PLAINTIFF | § | |
| | § | |
| VS. | § | CIVIL ACTION NO. 12-CV-5208-JLH |
| | § | |
| FEDERAL COMMUNICATIONS | § | |
| COMMISSION, MICROSOFT CORP., | § | |
| AND GOOGLE INC., | § | |
| | § | |
| DEFENDANTS | § | |

**DEFENDANT GOOGLE INC.’S REPLY
IN SUPPORT OF ITS MOTION FOR SANCTIONS UNDER RULE 11**

With each subsequent filing, Plaintiff Curtis J. Neeley (“Mr. Neeley”) reveals his malicious intent in carrying on with this litigation against Defendant Google Inc. (“Google”). In his Response to Rule #11 Sanction Motion (“Response”) (Dkt. No. 40), Mr. Neeley does not argue against the sanctions requested by Google, or state why his lawsuit is not malicious, vexatious, frivolous, or intended solely to harass Google. Instead, he reiterates exactly why Google must seek the Court’s protection. Mr. Neeley states “he agrees with the rational [sic]” in Google’s Motion, he is nearly “immune to monetary sanctions”, he will force Google to “face this claim again and again or over and over, if not repeatedly”, and finally, that “[t]his District Court must . . . order this Plaintiff not to Pursue Google Inc [sic] further” Response at 1. Mr. Neeley will continue to embroil Google in vexatious litigation regardless of its frivolity. His intent is crystal clear. Only a Court order preventing further litigation can end his crusade.

Therefore, and for the reasons asserted in its Motion, this Court should grant the relief requested by Google and required by Mr. Neeley's own admission.

Respectfully submitted,

\s\ Jennifer H. Doan

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**ATTORNEYS FOR DEFENDANT
GOOGLE INC.**

CERTIFICATE OF SERVICE

I, Jennifer H. Doan, hereby certify that on January 6, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to CM/ECF participants, and I hereby certify that I have mailed the document by the United States Postal Service to the following non-CM/ECF participants:

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\s\ Jennifer H. Doan
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