## IN THE UNITED STATES COURT FOR THE WESTERN DISTRICT OF ARKANSAS U.S. DISTRICT COURT WESTERN DIST ARKANSAS

Curtis J Neeley Jr., MFA

**Plaintiff** 

FILED

V

**CASE NO. 12-5208** 

CHRIS R. JOHNSON, Clerk

JAN 0 7 2013

Deputy Clerk

Federal Communications Commission. Microsoft Corporation, Google Inc.

**Defendants** 

## SECOND RESPONSE TO RULE #11 SANCTION MOTION "MOTION FOR SANCTIONS" BY Google Inc.

- 1. The Plaintiff agrees generally with the rational in Defendant Google Inc's Dkt. #36 "Motion for Sanctions" except the Amended Complaint is obviously not frivolous and calls for the end of anonymous porn-by-wire. Defendant Google Inc Counselors have apparently not yet read the Amended Complaint. The Plaintiff created images of the naked female and placed these on private computers connected to common carrier wires after becoming paralyzed and brain injured in 2002. These were: 1.)<photo.net>, 2.)<wikipedia.org>, 3.)<redbubble.com>, and 4.)<deviantart.com>.
- 2. The first of these was not described per the res judicata rational wished to be stretched out now or redefined inappropriately by Defendant Google Inc Counselors. Claim preclusion does not get close to reaching out to the last two 47 USC §231 compliant uses. The second usage was not included since the usage of "curtis neeley" was removed though the "donated" naked images remain at <wikipedia.org> since donations are permanent.
- 3. This District Court must either order this Plaintiff not to pursue Google Inc further for display of Plaintiff's naked female figures to the anonymous or Google Inc will face this claim again and again or over and over, as is explained further herein.
- 4. Honorable Jimm Larry Hendren will die decades before the loss of personal freedoms begun by Honorable Jimm Larry Hendren's criminal judgments will have passed. These crimes are due to the widespread use of naked images transmitted by unregulated wire communications.

5. The United States District Courts are not the only venue pursued now by this Plaintiff. The

EVIL open "inter" network of simultaneous wire and radio communications will not exist for

one additional generation. Anonymous access to indecent images will not remain for five more

years, as is hoped by this Plaintiff.

6. This supplemental response to the Google Inc Counselor's Motion for Rule 11 Sanctions is

typed slowly in hopes opposing counselors will now read the Amended Complaint while the two

Corporate Defendants each consider the latest private offer to settle.

7. No naked images done by the Plaintiff are returned for the last few months on ANY

networked wire communication searches for "curtis neeley" for the first time in the history of wire

searches. This is true even for searches of "curtis neeley nude".

8. The naked images once done by the Plaintiff will always remain internationally distributed

and may be retransmitted by unregulated wire communications and associated with the Plaintiff's

name FOREVER against the Plaintiff's desires. Still; Plaintiff does not desire to force Plaintiff's

recent decision regarding ALL naked images being inappropriate on anyone. This is a private

personal choice reserved exclusively for parents to influence. Minor children, however, should not

face choosing to avoid or choosing to enjoy public nakedness.

Curtis J. Neeley Jr. 2619 N Quality Lane Suite 123 Fayetteville, AR 72703

Respectfully Submitted,

Curtis J Neeley Jr., MFA

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## 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