

**IN THE UNITED STATES COURT
WESTERN DISTRICT OF ARKANSAS**

CURTIS J NEELEY JR, MFA

VS

CASE NO. 5:09-cv-05151-JLH

NameMedia Inc.

Network Solutions Inc.

Google Inc.

**MOTION REQUESTING LEAVE TO FILE THIRD
AMENDED REPLACEMENT COMPLAINT**

Whereas; the Federal Rules of Civil Procedure Rule 15(c)(1)(B) are the controlling legal standard and the attached amendment asserts a claim that arose out of the conduct or occurrences attempted to be set out in the original pleading and are within the 120 days allowed by Federal Rules of CP Rule 4(m) from the original filing,

1. The Plaintiff believes this action fatally flawed unless amended due to the otherwise fatal legal errors of a brain damaged pro se party. This amending will save all parties expenses and not waste the diligence of the Court already invested. It also would make Motion to Dismiss Docket #104 Moot. Plaintiff does not believe he has herein repeated his former improper conduct or tenor. Seven days will give enough time to locate the Agents for Service and submit them with the Third Amended Replacement Complaint to the Court for a Certified Postal USMS Summons as well. The Brief filed Supporting this Motion lists concisely the claims added, the parties added, as well as the claims that are dismissed per the Court Ruling Docket 97. Granting Leave to file a Third Amended Replacement Complaint will make motions Docket ## (99, 104, 107 and 109) moot as well.

Wherefore as supported by concurrently filed concise Supporting Brief listing added parties, added claims, and dismissed claims; pro se Plaintiff prays as a pauper that Leave for filing a Replacement Third Amended Replacement Complaint like attached as an exhibit and thereby completely complying with Local Rule 5.5(e) like a represented party though acting completely pro se be granted.

Respectfully and humbly submitted,

Curtis J Neeley Jr, MFA