

**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 PRELIMINARY INJUNCTIONS
TO STOP DEFAMATIONS AND TITLE 15 § 1125 VIOLATIONS**

Whereas; the Federal Rules of Civil Procedure Rule 65 are the controlling legal standard, the attached amendment asserts a claim that continually damages the honor of the Plaintiff that warrants a preliminary injunction against the parties as described in the concurrently filed supporting brief. This sustains an injunction without further notice and an injunction preventing advertising of Plaintiff's expiring domains. This motion is an attempt to mitigate damages contrary to the tenth Google Inc affirmative defense of failure to mitigate damages. The Plaintiff states this Preliminary Injunction Motion begs the Court to end the demonstrated policy of continued defamation that is expanding during this litigation and must be halted by Court Orders. Defendant Google Inc is adding more defamatory damages in spite of a Federal Court lawsuit. The collateral order doctrine makes not allowing the issues of Lanham Act violations Act and Title 17 violation due to statutory limitations while not applying equitable tolling to be a collateral ruling too important to the claim and too independent of the permitted defamation claim for an appellate decision to be deferred until the entire case is adjudicated. This is supported more specifically in the concurrently filed supporting brief and a notice of appeal that will be concurrently filed.

Respectfully and humbly submitted,

Curtis J Neeley Jr, MFA