

**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 SEEKING SANCTIONS FOR HARASSING ANSWERS

Defendant NAMEMEDIA INC should face sanctions for their answers that are fraudulent and given to harass the plaintiff as proven uncontrovertibly in supporting Brief filed concurrently.

The Court could take its own initiative. *See* Local R. of C. P. from *Pro Se* manual Rule 11 (b) (1) p. 26, but Plaintiff will not rely on that possibility. NAMEMEDIA INC can be seen on the record to have filed lies and should pay to offset all actions of the court to date that are a lien on the eventual judgment. Defendant Council detrimentally relied on an obviously dishonest client as can be seen now on the record and should not bear the costs of sanctions the Plaintiff prays are awarded to offset the costs of preparing this motion as well as requiring Defendant NAMEMEDIA INC to file new answers that are factual and not done to further harass the *Pro Se* Plaintiff. Plaintiff is not familiar with law enough to understand how answers that are lies can be allowed and asserts that it is

not logical to see answers that are incontrovertibly fraudulent to be entered when the record now shows them to be fraudulent.

**WHEREFORE**, having notified the Court of Plaintiff objections to Defendant NAMEMEDIA INC lies that were entered as answers; Plaintiff prays that the Court issue sanctions to Defendant NAMEMEDIA INC for costs of printing exhibits, and all other proper relief. The Pro Se Plaintiff has no attorney fees for this action but prays that the Court issue sanctions significant enough that no other mentally disabled *Pro Se* pauper ever faces such outrageously fraudulent answers. (See docket # 17). The amount that would cover the cost of material used would be trivial and would resemble a fine or license fee for filing lies. An injunction allowing the Plaintiff to remove only the images that are being used against his wishes to slander Plaintiff would mean more to the Plaintiff than a trivial fine. Printing costs were roughly \$200 and filing fees and service fees that are liens should be offset as well. Plaintiff prays that monetary Sanctions of \$2,700 be attached to Defendant NAMEMEDIA INC for harassing answers that were done to further distress the Plaintiff by entering lies before the Court. Plaintiff prays these all would be found to be proper relief. There are no issues of law remaining to be tried and Plaintiff would like the Court to set a scheduling hearing at its earliest convenience since the Plaintiff is ready to proceed with discovery.

Respectfully submitted,

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/s/ Curtis J Neeley Jr, MFA

### **CERTIFICATE OF SERVICE**

I hereby certify that, on this \_\_\_\_day of December 2009, I mailed a copy of the foregoing to the attorney representing NAMEMEDIA INC at the following address:

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/s/Curtis J Neeley Jr, MFA  
Curtis J Neeley Jr, MFA