

**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 SUMMARY JUDGMENT
AGAINST NAMEMEDIA INC COUNTERCLAIM**

Curtis J Neeley Jr. MFA pursuant to Fed. R. Civ. P. 56 moves the Court for Summary Judgment to the counter claim alleged by NAMEMEDIA INC. The basis of this motion is set forth more particularly in a brief filed simultaneously herewith and further supported by a concise list of undisputable facts lacking issues for trial filed as directed by Local Rule 53.1(a) simultaneously by counter-Defendant.

Respectfully submitted,

Curtis J Neeley Jr, MFA

CERTIFICATE OF SERVICE

I hereby certify that, on this ____day of _____, 2010, I plan to mail a copy of the foregoing to the attorney representing NAMEMEDIA INC at the following address:

H. WILLIAM ALLEN (ABN 69001)
KEVIN M. LEMLEY (ABN 2005034)
ALLEN LAW FIRM
A Professional Corporation
212 Center Street, 9th Floor
Little Rock AR 72201

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