

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF ARKANSAS
FAYETTEVILLE DIVISION**

CURTIS J. NEELEY, Jr.

PLAINTIFF

VS.

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

**NAMEMEDIA, INC.;
NETWORK SOLUTIONS, INC.;
and GOOGLE, INC.**

DEFENDANTS

**SEPARATE DEFENDANT NAMEMEDIA, INC.'S RESPONSE TO
PLAINTIFF'S MOTION REQUESTING RECONSIDERATION
AND FOR LEAVE TO AMEND COMPLAINT**

Separate defendant NameMedia, Inc. ("NameMedia"), for its Response to Plaintiff's Motion for Reconsideration (Docket #99), states as follows:

For the same reasons set forth in Separate Defendant Google, Inc.'s ("Google's") Response and Brief in Opposition to Motion Requesting Consideration (Docket #106), NameMedia requests that Plaintiff's motion for a reconsideration be denied. In his motion Plaintiff does not apprise the Court of any facts of which it was not fully apprised at the time it entered its Order. He essentially makes the same arguments he made prior to entry of the Order and asserts that the Court made the wrong decision. This applies to all of the Plaintiffs' claims which were dismissed by the Court's Order.

Additionally, for the same reason asserted in Google's Response and Brief in Opposition to Motion for Leave to Amend Complaint (Docket #97), NameMedia requests that Plaintiff's motion for leave to once again amend his complaint be denied. Plaintiff should not be allowed to keep amending his complaint *ad infinitum*.

Respectfully submitted,

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By: /s/ H. William Allen
H. William Allen

By: /s/ Brooks C. White
Brooks C. White

Attorneys for Defendant and Counterclaimant
NameMedia, Inc.

CERTIFICATE OF SERVICE

I, Brooks C. White, hereby certify that on this 15th day of March, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following attorneys of record:

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I hereby certify that, on this 15th day of March, 2010, I mailed a copy of the foregoing to the following *pro se* plaintiff:

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/s/ Brooks C. White
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