

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF ARKANSAS  
FAYETTEVILLE DIVISION**

**CURTIS J. NEELEY JR.,**

**PLAINTIFF**

**VS.**

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

**DEFENDANT**

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**CIVIL ACTION NO. 09-5151**

**GOOGLE INC'S RESPONSE IN OPPOSITION TO THIRD MOTION FOR LEAVE TO  
FILE THIRD AMENDED REPLACEMENT COMPLAINT**

Google Inc. opposes Mr. Neeley's third request to file yet another complaint, this one describing itself as a "Complaint for Outrageous Torts Including Trademark, Copyright, and Privacy Violations Resulting in Several Intentional Defamations and Other Torts." Dkt. No. 111-1. Nothing in the proposed Third Amended Complaint cures any of the prior defects of Mr. Neeley's claims, and nothing states a new claim against Google or anyone else.

For the reasons stated in this motion and the accompanying brief, the motion for leave to amend should deny.

Respectfully submitted,

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**ATTORNEYS FOR DEFENDANT  
GOOGLE INC.**

**CERTIFICATE OF SERVICE**

I, Joshua R. Thane, hereby certify that on March 24, 2010, I electronically filed the foregoing GOOGLE INC'S RESPONSE IN OPPOSITION TO THIRD MOTION FOR LEAVE TO FILE THIRD AMENDED REPLACEMENT COMPLAINT with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following list:

H. William Allen  
Brooks White  
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Little Rock, AR 72201

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and I hereby certify that I have mailed the document by the United States Postal Service to the following non-CM/ECF participants:

Curtis J. Neely, Jr.  
2619 N. Quality Lane  
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Joshua R. Thane  
Joshua R. Thane