

**IN THE UNITED STATES COURT
WESTERN DISTRICT OF ARKANSAS**

U.S. DISTRICT COURT
WESTERN DISTRICT ARKANSAS
FILED

NOV 16 2009

CURTIS J NEELEY JR, MFA

CHRIS R. JOHNSON, CLERK

BY

DEPUTY CLERK

VS

CASE NO. 5:09CV05151

NameMedia Inc.

Network Solutions Inc.

Google Inc.

**MOTION TO FILE AN AMMEDED COMPLAINT AS A PAUPER
AND SEEKING AN ORDER FOR REMOVAL OF ROBOTS.TXT FILE**

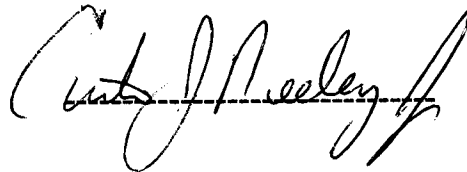
Comes now Plaintiff, respectfully to this court and moves to file an amended complaint as allowed as a matter of course by Title III Rule 15 (a) (1) in the Federal Rules for Civil Procedure and summarizes this action as follows:

1. Plaintiff seeks that Defendants each are served with a copy of this amended complaint filed by the Plaintiff as a pauper and seeks also that Defendant NameMedia specifically be ordered to remove the spider.txt file from their sleepspot server to allow access to the archived data. The Defendant NameMedia Inc has placed the robot.txt file since this action started and an order compel the file's removal was allowed in Netbula, LLC v. Chordiant Software Inc. 2009 WL 750201 (N.D. Cal.2009). Plaintiff has already asked the Internet Archive Inc to restore access to records that cover when the Plaintiff owned the website

and was told it would represent a significant burden to the Internet Archive organization, necessitating the development of new tools and software. The order to remove the file that prevents the retrieval of data at an un-interested third-party archive was found not to be an injunctive relief in US District Court already. NameMedia did not place the file to protect copyrightable material and did it solely to hide evidence that is otherwise publicly available.

WHEREAS premises herein considered as supported by prior court rulings herein presented as well as the Federal rules of Civil procedure, the Pro Se Plaintiff prays that the Court recognize the two additional Defendants Google Inc and Network Solutions Inc and serve them as well as NameMedia Inc of the amended complaint and that NameMedia be ordered to remove the file from the sleepspot server that prevents evidence retrieval and that NameMedia be required to pay as the Court requires to offset the cost of these legal proceeding that they are intentionally making more costly.

I CERTIFY THAT THE ABOVE IS COVERED BY THE
VERIFICATION MADE ON MY INITIAL COMPLAINT.

A handwritten signature in black ink, appearing to read "Curtis J. Neeley", written over a horizontal dashed line.