

**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 REQUESTING LEAVE TO
FILE REPLACEMENT COMPLAINT**

Whereas; the Federal Rules of Civil Procedure Rule 15(c)(1)(B) are the controlling legal standard and the attached amendment asserts a claim that arose out of the conduct or occurrences attempted to be set out in the original pleading and are within the 120 days allowed by Federal Rules of CP Rule 4(m) from the original filing,

1. This amending will save all parties expenses and not waste the diligence of the Court already invested. Plaintiff has not repeated his former improper conduct or tenor. Seven days will give enough time to locate the Agents for Service and submit them with the Replacement Complaint to the Court for a Certified Postal USMS Summons as well. The Brief filed supporting this Motion lists concisely the claims added, the parties added, as well as no dismissed claims or parties.

2. The ruling of the Supreme Court on Monday May 24, 2004 supports replacing the complaint and leave to replace should be granted in light of the controlling Supreme Court ruling. Lewis v. Chicago, (08-974)

Wherefore as supported by concurrently filed concise Supporting Brief listing added parties, added claims, and dismissed claims; pro se Plaintiff prays as a pauper that Leave for filing the Replacement Complaint like its attached exhibit and thereby completely complying with Local Rule 5.5(e) like a represented party though acting completely pro se as a pauper be granted.

Respectfully and humbly submitted,

Curtis J Neeley Jr, MFA