

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

CURTIS J. NEELEY JR.,	§	
	§	
PLAINTIFF	§	
	§	
VS.	§	CIVIL ACTION NO. 09-5151
	§	
NAMEMEDIA, INC., NETWORK SOLUTIONS, INC., GOOGLE INC.	§	
	§	
DEFENDANT	§	

GOOGLE INC.'S CROSS MOTION FOR PROTECTIVE ORDER

Mr. Neeley has filed yet another in his endless series of motions, none of which have the slightest merit. Google Inc. respectfully moves the Court to enter a protective order relieving the defendants from the obligation to respond to further pleadings or motions from Mr. Neeley unless the Court requests responsive briefing. We will of course be happy to provide briefing on any issue or motion the Court feels would be helpful, but ask that we be relieved of the ongoing cost of reviewing and responding to each of Mr. Neeley's increasingly frivolous pleadings and motions.

Respectfully submitted,

/s/ Joshua R. Thane
Jennifer H. Doan
Arkansas Bar No. 96063
Joshua R. Thane
Arkansas Bar No. 2008075
HALTOM & DOAN
Crown Executive Center, Suite 100
6500 Summerhill Road
Texarkana, TX 75503

Telephone: (903) 255-1000
Facsimile: (903) 255-0800
Email: jdoan@haltomdoan.com
Email: jthane@haltomdoan.com

Michael H. Page
Durie Tangri, LLP
217 Leidesdorff Street
San Francisco, CA 94111
Telephone: 415-362-6666
Email: mpage@durietangri.com

**ATTORNEYS FOR DEFENDANT
GOOGLE INC.**

CERTIFICATE OF SERVICE

I, Joshua R. Thane, hereby certify that on October 5, 2010, I electronically filed the foregoing GOOGLE INC.'S CROSS MOTION FOR PROTECTIVE ORDER 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
Allen Law Firm, P.C.
212 Center Street
Ninth floor
Little Rock, Arkansas 72201

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
Apartment 123
Fayetteville, AR 72703

/s/ Joshua R. Thane
Joshua R. Thane