

**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 BRIEF IN SUPPORT OF
CROSS MOTION FOR PROTECTIVE ORDER**

To date, Mr. Neeley has besieged this and other courts with scores of incoherent, frivolous, and offensive pleadings. The docket in this matter, which is still at the pleading stage, numbers over 170 items. Mr. Neeley has also filed multiple failed appeals and motions before the Eighth Circuit, and petitions for writs of both mandamus and certiorari before the United States Supreme Court. In addition, Mr. Neeley sends frequent, lengthy, and offensive letters to all counsel, members of the Senate, FCC Commissioners, and members of the Supreme Court clerk’s office. Each of these increasingly strident screeds wastes the Court’s time and ours. It also costs our clients money, as attorney time must be wasted almost daily reviewing each missive, determining whether it requires a responsive pleading.

Many months ago, we opened one of our briefs with the statement “Enough is enough.” Little did we know. We therefore ask the Court’s help in stopping this foolishness. Specifically, we ask that the Court 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
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**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 BRIEF IN SUPPORT OF 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