

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

Curtis J Neeley Jr., MFA

PLAINTIFF

vs.

NO. 09-05151

**NAMEMEDIA INC.,
& Google Inc.**

DEFENDANTS

**PLAINTIFFS RESPONSE TO THE GOOGLE INC
CROSS MOTION FOR PROTECTIVE ORDER**

Plaintiff marvels that on September 30, 2010, Honorable Denny Chin granted the Japan P.E.N. motion to file an amicus Brief in opposition of the proposed settlement agreement in New York and yet Google Inc continues to announce it as settled. Endless describes that litigation where scores of countries and parties in addition to the US Attorney General have objected to the claimed conspiracy called a settlement. There the docket is at 848 after five years and ten days.

Google Inc Counsel somehow conveniently failed to recognize that on March 24, 2010 the Supreme Court established the precedent where limitations as a defense, like used by Honorable Jimm Larry Hendren, were inapplicable due to repetitions of the acts four days after the mistake. Rather than wait till the final ruling to have the March 20, 2010 ruling overturned, the Plaintiff has sought to use the legal process of the United States judicially. The Petition for Certiorari now before the Supreme Court requests only that the Motion to Amend be allowed in the Western District of Arkansas Court as now plead or basically requiring granting Docket 167.

The Petition for a *Writ of Mandamus* asks only that the moral rights allegedly recognized for Australians, Canadians, and other Berne Convention country citizens by the Berne Convention Implementation Act of 1988 finally be recognized for United States citizens and that the Federal Communications Commission begin treating the Internet as the wire communications they have always been.

Both supreme Court Petitions will be submitted to conference at roughly the same time on October 14 and then be considered on roughly October 29th 2010. Honorable Jimm Larry Hendren might recognize that the Supreme Court has already contradicted him before then and that no insane minor has ever been in prison in the US to support his prior rulings on March 20th, 2010 and that insanity and minority are usually defenses.

Google Inc treats these plain errors as deserving to wait for correction. The Plaintiff greatly appreciates the amount of consideration thus far but refuses to wait several years to stop Michael Peven's erect penis from returning from the Google Inc safe image search for the Plaintiff's personal name or for his figure nude art to continue being shown to minors or Muslims against Plaintiff's wishes in image searches.

The Plaintiff has spoken to numerous Senators, Congressmen, and Supreme Court Clerks regarding this matter as well as numerous FCC personnel via wire. Honorable Jimm Larry Hendren might allow the complaint as attached to Docket 167 and change how history records him. This case will impact the Earth more than any case ever has and will do this now regardless of whether the Western District of Arkansas is where it starts to resolve or if the Supreme Court requires it slightly before the elections or soon after those desiring to stop unregulated wire-pornography are elected.

Either way the Plaintiff has no opposition to either two current Defendants being granted “protective” orders requiring they respond only if directed by the Court. They both ignored the Petition for Mandamus and waived a response for the Certiorari Petition. When the order that has been pending for nearly five months is denied it will not be ignored for even one day.

The protective order provided to the Plaintiff for preview looked acceptable but still included Network Solutions Inc as a defendant. Plaintiff is unsure if this was proper and if leaving them out of Docket 167 and this response was wrong or if it was an error of an overworked Google Counselor.

Plaintiff has allowed the equitable tolling ruling to remain, although appealable, and dismissed the 2003 trespasses of Network Solutions LLC and only sought to add Network Solutions LLC again for their current US Title 15 § 1125(d) trespasses.

Both current defendants have opposed Docket 167 and these oppositions were absurd and attempted only to lock Honorable Jimm Larry Hendren into obvious errors. The Plaintiff does not in the least oppose the Cross Motion that NAMEMEDIA INC and Google Inc be no longer required answering unless told by the Court to Reply. Plaintiff only begs that the Court rule before the Supreme Court Conference and allow dismissing of the Petition for Certiorari. Denial of the request to become a CM/ECF party will not be appealed because CM/ECF is a double-edged sword anyway. Plaintiff prays Docket 167 is granted and this resolves in less than two more years but doubts that is possible due to the unquestionable power of modern pornographic wire communications.

Respectfully submitted by hand,

Curtis J Neeley Jr, MFA

CERTIFICATE OF SERVICE

I hereby certify that today I will file a copy of the foregoing with the Court clerk for the United States Court in the Western District of Arkansas and the clerk will scan each document and it will be made into a B&W PDF and be available to all attorneys representing the Defendants for this case. Their Counsel will each receive notification from EM/ECF. The color PDFs that were printed from are accessible free to the public at <<http://www.CurtisNeeley.com/5-09-cv-05151/Docket>> immediately and perpetually by the end of the day.

[CurtisNeeley.com/5-09-cv-05151/Docket](http://www.CurtisNeeley.com/5-09-cv-05151/Docket)

/s/Curtis J Neeley Jr.
Curtis J Neeley Jr, MFA