

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

CURTIS J. NEELEY, JR.

PLAINTIFF

V.

CASE NO. 5:09-cv-05151

NAMEMEDIA, INC.;
and GOOGLE INC.

DEFENDANTS

NETWORK SOLUTIONS' MOTION FOR PROTECTIVE ORDER

Comes now Network Solutions, LLC ("Network Solutions") and for its Motion for Protective Order, states as follows:

1. As previously stated and conceded by Plaintiff in DOC. #173, this Court has dismissed Network Solutions as a party Defendant in this action. Nevertheless, Plaintiff continues to file correspondence and pleadings purporting to include Network Solutions in this action.

2. On October 5, 2010, Defendant Google Inc. ("Google") filed its Motion for Protective Order and Brief in Support thereof (DOCS. ##171-172). Google asks for this Court's Protective Order relieving the Defendants from the obligation to respond to further pleadings or motions unless the Court requests responsive briefing. Plaintiff does not oppose this Motion. DOC #173.

3. Network Solutions agrees that Plaintiffs' repetitive filings at this point have the primary effect of increasing Network Solutions' attorney's fees.

4. Accordingly, Network Solutions joins Google's Motion and asks that this Court enter its Order pursuant to its inherent power to control its docket and protect the parties from annoyance and unnecessary costs.

5. A Brief in Support of this Motion is being submitted herewith.

WHEREFORE, Network Solutions, LLC prays that this Court enter its Protective Order relieving the parties from having to further respond to Plaintiff's filings and for such other relief as the Court deems equitable and just.

Respectfully submitted,

NETWORK SOLUTIONS, LLC,
Defendant

By: /s/ John M. Scott
Robert L. Jones, III, AR Bar #69041
John M. Scott, AR Bar #97202
Kerri E. Kobbeman, AR Bar #2008149
CONNER & WINTERS, LLP
211 E. Dickson Street
Fayetteville, AR 72701
Telephone (479) 582-5711
Facsimile (479) 587-1426

CERTIFICATE OF SERVICE

I hereby certify that on October 6, 2010, I electronically filed the foregoing with the Clerk of Court using the CM/ECF System which will send notification of such filing to the following:

H. William Allen
Brooks C. White
Allen Law Firm
212 Center Street, 9th Floor
Little Rock, AR 72201

Michael H. Page
Durie Tangri, LLP
217 Leidesdorff St.
San Francisco, CA 94111

Jennifer H. Doan
Joshua R. Thane
Haltom & Doan
Crown Executive Center, Suite 100
6500 Summerhill Rd.
Texarkana, TX 75503

I hereby certify that I have mailed the document by the United States Postal Service to the following non CM/ECF participants:

Curtis J. Neeley, Jr.
2619 N. Quality Lane, Apt. 123
Fayetteville, AR 72703

/s/ John M. Scott

John M. Scott