

**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' BRIEF IN SUPPORT OF
MOTION FOR PROTECTIVE ORDER

As set forth in the Motion for Protective Order and Brief in Support filed previously by Google Inc. (DOCS. ##171-172), Plaintiff has continued to file repetitive, incoherent, frivolous and offensive pleadings. Network Solutions therefore joins Google's Motion for a Protective Order which would relieve the parties from the obligation of having to continue to review, consider and acknowledge Plaintiff's filings until or unless the Court requests a response thereto. As always, Network Solutions respects this Court's docket and will provide a response to anything upon which the Court requests a response. However, based upon the volume and history of this case, Network Solutions respectfully requests that this Court exercise its equitable power to relieve the parties from unnecessary costs, expenses and annoyance. Network Solutions therefore requests a Protective Order consistent with that being requested by Separate Defendant Google Inc.

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