

**IN THE UNITED STATES COURT FOR  
THE WESTERN DISTRICT OF ARKANSAS**

**Curtis J Neeley Jr., MFA**

v

**CASE NO. 5:09-cv-05151**

**NameMedia Inc.  
Google Inc.**

**MOTION FOR JOINING OF CLAIMS AND  
JOINDER OF THE FCC AS ANOTHER PARTY**

Comes now the Plaintiff respectfully, and moves to add several claims against parties already served pursuant to Federal Rules of CP Rule 18(a) and for permissive joinder of the Federal Communications Commission (FCC) pursuant to Federal Rules of CP Rule 20(a)(2)(a). This is not a motion to amend or replace like the previous denied motions and seeks an order for a separate trial with the Federal Communications Commission in the alternative to joinder pursuant to Federal Rules of CP Rule 20(b). Some claims sought were discovered after NameMedia Inc ceased violating Plaintiff's exclusive rights to publish original nude photographs after January 24<sup>th</sup> 2010 and others were discovered or occurred while prosecuting this action.

Each claim alleged is supported by evidence now in the record. This Motion for Joinder of Claims and the Permissive Joinder of the Federal Communications Commission is further described concisely in the concurrently filed brief. Defendants have known of these claims since this action started and the Federal Communications Commission denied having jurisdiction over wire communication when the Plaintiff complained to them and are very aware of this claim. These claims involve or are based on the same series of occurrences and this motion is within the time allowed for joining in the initial scheduling order of Docket 188 and is in the interest of justice.

Respectfully Submitted

Curtis J. Neeley Jr., MFA