

**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 RESPONSE TO PLAINTIFF'S FINAL BRIEF SUPPORTING
MOTION FOR DOCKET 184 PRELIMINARY INJUNCTION**

Google Inc. ("Google") opposes Mr. Neeley's request for any injunction against Google as detailed in Google's response in opposition (Dkt. No. 205). Mr. Neeley's additional "briefing" (Dkt. Nos. 206 and 207) and recent flurry of emails and internet blog posts (attached hereto as Exhibit 1)¹, however, raise several new arguments, which are addressed below.

First, Mr. Neeley claims that Google misrepresents the content of his blog and changed text on his blog to create a link. This is not true. Exhibit A to Docket Number 205 correctly displays that Mr. Neeley himself created the link to the vampandtramp.com website on which Mr. Peven's work appears. Indeed, the Vamp and Tramp website address is referenced twice in the August 6, 2010 post to Mr. Neeley's public blog, which was attached to Docket Number 205 as Exhibit A. Mr. Neeley seems to dispute whether a direct hyperlink to <http://www.vampandtramp.com/finepress/p/primitive-manmade-blueL.jpg> was on the original blog post; however, the fact remains that the address was entered on his personal blog which

¹ Exhibit 1, attached hereto, encompasses an e-mail sent November 7, 2010, November 9, 2010*, two emails sent November 10, 2010 (one of which is posted on Mr. Neeley's blog), two emails sent November 14, 2010*, November 15, 2010*, November 21, 2010*, and two emails sent November 22, 2010*. The emails with the asterisk are also posted on the internet to Mr. Neeley's blog (<http://open.salon.com/blog/curtisneeley>); however only one email dated November 10, 2010 is posted to Mr. Neeley's blog.

associates Mr. Neeley and Mr. Peven's work for the purpose of a search. The fact that the addresses were located in relationship to the search terms "Curtis Neeley" is what created the relevancy of Mr. Neeley's name to Mr. Peven's work for the purpose of a search return. That is the issue – not whether the link was "live."

Further, Google did not change any of the text on Mr. Neeley's blog in Exhibit A to create a link and deceive the Court. Mr. Neeley's entire blog was converted by Adobe Acrobat to a PDF in order to be properly attached to Dkt. No. 205. The User's Manual for the Western District of Arkansas CM/ECF System requires that all documents be converted to PDF format before filing them with the Court. Whether or not the conversion to PDF, as required by the Court, caused the link to become "live" is irrelevant. The correlation between Mr. Neeley and Mr. Peven's work still derives from Mr. Neeley's personal blog – that is something Google did not create or change.

Second, Mr. Neeley disputes that the Communications Decency Act applies to Google. Google, however, is protected under 47 U.S.C. § 230 of the Communications Decency Act as an internet services provider. Indeed, courts have held that claims similar to those asserted by Mr. Neeley against Google are barred by 47 U.S.C. § 230. *See, e.g., Parker v. Google, Inc.*, 242 Fed. Appx. 833, 837 (3rd Cir. 2007) (barring the plaintiff's claims for defamation, invasion of privacy and negligence arising out of allegations that Google failed to address harmful content posted by others). *See also, Goddard v. Google*, 640 F. Supp. 2d 1193 (N.D. Cal. 2009) (Google, as an internet service provider, is immune to state law claims such as defamation). Mr. Neeley's asserted claim of either "defamation" or "outrage" based on Mr. Peven's work cannot be brought against the search engine, in this case Google, for locating that work.

Third, Mr. Neeley has taken out of context the fact that Mr. Peven's work is not located on Google's servers as the publisher of the content. Google is not the publisher or provider of Mr. Peven's work. Although the images displayed as the result of a Google Images search are indexed through a Google server in order to provide search results to the public, the association of Mr. Peven's work with the search terms "Curtis Neeley" was not the product of the image

being located on a Google server. Mr. Peven's work was published by a third-party and appears as part of a web based advertisement for Vamp and Tramp Booksellers. Further, Mr. Neeley created the relationship between his name and Mr. Peven's work through writings on his own blog.

Finally, Mr. Neeley insists that the counsel for Google has violated the codes of professional conduct and should be sanctioned and/or grieved. These threats, however, are based upon either a misreading or misunderstanding of the arguments asserted in Docket Number 205. Counsel for Google responded to Mr. Neeley's concerns in a letter dated November 23, 2010 (attached hereto as Exhibit 2). Nevertheless, if this Court believes that additional explanation is required, Google will certainly respond.

For all the reasons stated herein, as well as the multiple additional grounds set forth in Google's response in opposition to Mr. Neeley's motion seeking a preliminary injunction (Dkt. No. 205), Mr. Neeley's motion for a preliminary injunction against Google should be denied.

Respectfully submitted,

/s/ Jennifer H. Doan
Jennifer H. Doan
Arkansas Bar No. 96063
Joshua R. Thane
Arkansas Bar No. 2008075
HALTOM & DOAN
Crown Executive Center, Suite 100
6500 Summerhill Road
Texarkana, TX 75503
Telephone: (903) 255-1000
Facsimile: (903) 255-0800
Email: jdoan@haltomdoan.com
Email: jthane@haltomdoan.com

Michael H. Page
Durie Tangri, LLP
217 Leidesdorff Street
San Francisco, CA 94111
Telephone: 415-362-6666
Email: mpage@durietangri.com

**ATTORNEYS FOR DEFENDANT
GOOGLE INC.**

CERTIFICATE OF SERVICE

I, Joshua R. Thane, hereby certify that on November 24, 2010, I electronically filed the foregoing GOOGLE INC'S RESPONSE TO FINAL BRIEF SUPPORTING MOTION FOR DOCKET 184 PRELIMINARY INJUNCTION 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, AR 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. Neeley, Jr.
2619 N. Quality Lane
Apartment 123
Fayetteville, AR 72703

/s/ Jennifer H. Doan
Jennifer H. Doan

Exhibit 1

From: Curtis Neeley Jr. [Curtis@CurtisNeeley.com]
Sent: Sunday, November 07, 2010 3:18 AM
To: Josh Thane; Jennifer Doan; Hwallen; Brooks Christopher White; Mpage
Subject: Good faith settlement offer.

Honorable Erin L Setser, Opposing Counselors, et al,

Mr Neeley trusts the Opposing Counselors have re-thought the motion seeking that Mr Neeley be certified as proceeding in bad-faith? Mr Neeley also trust the Opposing Counselors realize that "Dennis Factors" have always been complete frauds. Opposing Counselors are likely to already have known this. Honorable Jimm Larry Hendren is now likely to realize that denial of motions to amend require more of a rational than he is used to listing.

The Opposing Counselors have perhaps learned the common definition of "bad-faith" generally considered the opposite of "good faith" as used in the F.R.A.P Rule 24(a)(3) as referenced in the Motion of Docket 196. Docket 197 was supposed to support Docket 196. This supporting brief referred to Federal Rules of CP Rule 24(a)(3) and illustrated how easily even paid Opposing Counselors can file honest mistakes for which they bill clients in good faith. Federal Rules of CP Rule 24(a)(3) DOES NOT EXIST! Federal Rules of CP Rule 24 involves the right of intervention in litigation. Federal Rules of CP Rule 24(a) exists, but has only two sub-paragraphs.

Opposing Counselors are not likely to have had any MALICIOUS intention in referring to the Federal Rules of CP in the brief supporting Docket 196 to cause the *pro se* party to distress attempting to verify the referral to Federal Rules of CP Rule 24(a)(3) that does not exist. The Plaintiff will read every cited case or Rule relied on due to Honorable Jimm Larry Hendren referring to cases that actually involved the opposite type ruling as claimed. Opposing Counselors should have referred to the Federal Rules of Appellate Procedure and *pro se* litigants are not expected to be aware these appellate rules even exist.

There were links to the definition of "bad faith" in one of Mr Neeley's previous wire communications. It was not been filed to this point but all common definitions included malicious acts. Honorable Jimm Larry Hendren is not likely to have had a malicious intent when creating "*Dennis Factors*" using rulings that supported the Plaintiff's desires to amend. Honorable Jimm Larry Hendren was not likely to have had any malicious intention when addressing the ambiguity in ACA 16-56-116 by stating that the Arkansas Statute had at one time protected citizens who were minors and insane but who were in prison outside Arkansas. Arkansas citizens are often thought of as backwards but Arkansas is not the only State where minors are often prisoners and especially not minors who are insane.

Did any Opposing Counselor notice the Supreme Court establishing limitations solidly at the last of repeated acts on May 24, 2010 or four days after Honorable Jimm Larry Hendren's first set of obvious errors? Honorable Jimm Larry Hendren used limitations for sanction justifications like creating "*Dennis Factors*" to dismiss claims for Mr Neeley?

Opposing Counselors might believe the judge was following precedence to violate the intentions of Federal Rules of CP due to failing to read the filings referenced by Honorable Jimm Larry Hendren. The judge cited a case that resulted in the judgment being sent back for a new trial because of a District Court did not allow motions to amend an answer without motive while denying an appeal to amend the complaint with absolutely no reason explained.

Are any of the Opposing Counselors confused enough to still believe the severely brain damaged Plaintiff will allow Honorable Jimm Larry Hendren to impose sanctions or dismiss parties and claims and violate Federal Law by abusing discretion?

The Plaintiff hopes Honorable Erin L Setser recommends that Honorable Jimm Larry Hendren enters a preliminary injunction that requires Google Inc to cease displaying nudes as a result of searches for the name of the Plaintiff. The Plaintiff will file a judicial complaint against Honorable Jimm Larry Hendren eventually due to repetitive abuses of discretion. No judicial complaint can be based on current litigation. The primary mission of the Plaintiff in life is stopping pornography distribution by wire communications even when called the Internet.

Currently the Plaintiff has not proceeded with the appeals because three Google Inc search engine competitors ceased returning nudes in image searches for the Plaintiff by name. After Honorable Jimm Larry Hendren tries to protect pornography by not allowing the FCC as a party and Google inc is not subjected to a preliminary injunction, these obvious errors will proceed IFP on appeal whether Honorable Jimm Larry Hendren certifies the Plaintiff not acting in good faith or does not. Honorable Jimm Larry Hendren has massively abused discretion already and ruled contrary to the Supreme Court. The Plaintiff's first desire was in stopping nudes done by him from being returned in safe-searches at schools. Appeal would delay a final ruling and had the other three search engines not already nearly complied with the Plaintiffs desires this would have been pursued at the Supreme Court and would have certainly been granted instead of being denied.

Cynthia Lucy Rapp hoped to protect pornography. Several other Supreme Court Clerks planned to recommend Certiorari and the Mandamus being granted. The Plaintiff despises speaking on the telephone but spoke to enough Supreme Court Clerks and others with the Supreme Court to feel this issue would be safer to pursue initially in the district court.

1. <http://www.bing.com/search?q=Cynthia+Lucy+Rapp>
2. <http://www.google.com/search?q=Cynthia+Lucy+Rapp>
3. <http://search.yahoo.com/search?p=Cynthia+Lucy+Rapp>
4. <http://www.ask.com/web?q=Cynthia+Lucy+Rapp>

Ms Rapp's position is anchored already in this process and numerous other Supreme Court Clerks requested that their names and opinions not be disclosed. They will not be nor will the Clerks spoken to at the Eighth Circuit be disclosed. The Plaintiff is already aware of what the end results of this litigation will be regardless of how Honorable Jimm Larry Hendren rules on anything as his rulings are now completely irrelevant and solidly support an appeal. Honorable Jimm Larry Hendren can only affect how history remembers him in the lawsuit that ends the open distribution of PORN on the Internet and made Internet content be regulated by the FCC. The only thing that has been established is that Google would pay five million dollars to have this case disappear and protect sales of porn. The Plaintiff has made it so that offer is not likely to remain because adding the FCC and the others has made regulation of indecent content on the Internet impossible to stop even if Google Inc were dismissed. This is now the result even if the Plaintiff dies. This has been planned carefully.

This communications is not going to be published by wire by the Plaintiff and Opposing Counselors may ignore it or file it as an exhibit. The Plaintiff is very likely to have offended Honorable Jimm Larry Hendren already somehow and the BLOG entry Honorable Jimm Larry Hendren shares with Ms Rapp linked above is likely the reason. Honorable Jimm Larry Hendren will likely use a jury instruction like before as follows:

"The judge, being myself in this case, is tasked with determining issues of law, evidence, (sic) and procedure. Those matters are not for the consideration of the jury. It would be unfair to put it to them. They are not legally trained. They're not judges. They're not trained and hopefully experienced (sic). They're not experienced in such things."

The Plaintiff has not chosen to call attention predominately to Jimm Larry Hendren's illogical rulings yet. Plaintiff already knows that the abuse of discretion warrants a new trial. The Plaintiff believes Jimm Larry Hendren is already enshrined in history as being unfair although Mr Neeley has never met Jimm Larry Hendren. Mr Neeley hopes the Court decides to act morally but does not feel that Jimm Larry Hendren cares about being fair and is no longer able to be fair due to being insulted by the *pro se* Plaintiff. The Plaintiff was, however, told by a District Clerk that the judge would rule fairly even if personally offended. This is not published via wire communications as the others communications were due to fear that the ruling judge has already expressed being upset and as having determined to rule against the Plaintiff even if it involves being illogical and even if it involves intentionally distorting the rulings of the Eighth Circuit and creating "*Dennis Factors*" to justify abuse of discretion. The United States exists because Founding Slave Owners rejected rule by a king and prior rulings by Honorable "king" Jimm Larry Hendren conflates to rule of one confused old man in spite of law.

This is not filed in a motion but Honorable Jimm Larry Hendren is now likely to realize that "*Dennis Factors*" created by an angry judge are nothing besides US Title 17 violations of a Moore law text from 1948 wherein the ruling judge actually cited "*Moore Factors*" and named them inappropriately. Opposing Counselors, Honorable Erin L Setser, et al, may see the supplemental motion as HTML as follows.

<http://www.CurtisNeeley.com/NameMedia/docketPDFs/204/> So will search engines who examine Mr Neeley's open-Salon BLOG.

This wire communication is meant as a "good faith" attempt to mitigate damages of this communication and was not done for exclusively malicious intentions. This wire communications was done so that NAMEMEDIA INC counselors and Google Inc counselors would each realize their obvious lack of good faith in this proceeding. This wire communication will, however, be used to support the Plaintiff's claims for punitive damages. Please carefully read the disclaimer below and, if receiving this wire communication in error, delete it or enter it as another exhibit. It is not a good idea for the Plaintiff to upset the ruling judge but Honorable Jimm Larry Hendren's personal frustrations are no longer relevant in the least, as should be obvious now to Opposing Counselors along with their mistaken conflation of F.R.A.P. to the Federal Rules of CP. Filing an amendment to correct that error is warranted but will not prevent Esq White and Esq Thane from appearing incompetent and billing for a motion that undermines the motion it was filed to support.

Honorable Erin L Setser has permission to relay this wire communication directly to Honorable Jimm Larry Hendren.

Sincerely,

Curtis J Neeley Jr, MFA
www.CurtisNeeley.com
2619 N. Quality Ln, Ste 123
Fayetteville, AR 72703
Voice: 479-263-4795

DISCLAIMER: Curtis Neeley suffered a severe traumatic brain injury that often very negatively impacts his communications. He is often perceived as blunt, tactless, self-centered and rude. Although Curtis has a severe disability, he is determined to continue creating meaningful visual art. The Curtis Neeley Foundation will be created to preserve and promote his artistic photographic legacy.

PS The offer to settle for five billion for either party already named remains. NAMEMEDIA INC best begin planning for refusing to pay an award as the Plaintiff already expects. Maybe NAMEMEDIA INC can still do a public offering and get the public to invest in their domain name Ponzi scheme as once planned?

From: Curtis Neeley Jr. [Curtis@CurtisNeeley.com]
Sent: Tuesday, November 09, 2010 3:31 PM
To: Josh Thane; Jennifer Doan; Hwallen; Brooks Christopher White; Mpage
Subject: Wire Frauds and Rule 11

Opposing Counselors,

Esq Doan,

1. Falsifications are always relevant and the claim that the Michael Peven erect penis photo was not on a Google server was a malicious falsehood on the top of page three. Mr Peven's penis photo was then and is now, in fact, on a Google Inc server. It is currently shown as a thumbnail from <http://t2.gstatic.com/images?q=tbn:7OheR7Ffo0uhuM>. THIS IS A GOOGLE INC SERVER! The JavaScript page hides this fact very well. Esq Doan, has till 11/27/2010 to correct this misleading claim or face a motion for Rule 11 sanctions. The erect penis photo is not allowed displayed to minors by law and this "art" also offended the Eighth Circuit.

2. While still on page three, Esq Doan revealed her second deception. "It is Mr. Neeley's own blog site, at Salon.com, in which Mr. Neeley himself placed a link to Mr. Peven's work. See Exhibit A, print out from Curtis Neeley's Open Salon.com blog." Are you aware of the common meaning of the term link? Why did you mislead the Court to believe that a link to Mr Peven's penis photo existed? You can correct this false claim in 21 days as well or be subject to a motion seeking sanctions.

3. Before leaving the third page Exhibit A is referenced. In the PDF entered into evidence Esq Doan took it upon herself to make the bare text a link to support her claim. This is a criminal action of creating fraudulent evidence by wire. Esq Doan revealed having violated the Arkansas Legal Code of Conduct and now get to explain causing the bare text to function as a link. You may correct this mistake in 21 days. A legal complaint against Esq Doan for violating the code of conduct for lawyers in AR will be begun nevertheless

4. On the top of page four we find the next falsehood. Esq Doan stated, "the link that outrages him is one he created on his own blog", and here again misrepresented facts supported by the exhibit link that was created by Esq Doan.

5. The juror does not get to the end of page four before encountering Esq Doan's next intentional deception. It follows, "Google, however, is an Internet Service Provider". Herein Esq Doan flatly mislead the Court. Given Jimm Larry Hendren's age, he might not be familiar with ISPs. Google Inc, however, is very aware that they host content and do not provide connectivity. Perhaps Esq Doan can plead ignorance as to the fact that her

statement was a wire fraud. Those 21 days will be busy but Mr Neeley will claim that this shows bad faith.

6. You are likely to be aware that Mr Neeley revealed displeasure respectfully in a motion with the District Court Judge who has ruled since before the Internet disguise for wire communications existed and before GOOG did.

THIS WIRE COMMUNICATIONS IS NOT PRIVATE AND CAN BE FOUND BY WIRE ON OPEN.SALON BLOG.

To add insult to injury.
the first below is a link.

1. <http://open.salon.com/blog/curtisneeley>
2. <http://open.salon.com/blog/curtisneeley>

The second above is a text string that is NOT a link like found on the BLOG before altered by Esq Doan.

In case you are actually confused about the term "Internet Service Providers", Exhibit A links will be active on my docket mirror.

<http://www.google.com/search?q=Internet+Service+Provider> << this is a link that lists the next URL as the location of the definition.

http://en.wikipedia.org/wiki/Internet_service_provider <<< Another example of a string of text that IS a link.

The Judge may be offended by the last entry and a complaint will be filed regardless.

Curtis J Neeley Jr, MFA
www.CurtisNeeley.com

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From: Curtis Neeley Jr. [Curtis@CurtisNeeley.com]
Sent: Wednesday, November 10, 2010 6:24 PM
To: Josh Thane; Jennifer Doan; Hwallen; Brooks Christopher White; Mpage
Subject: Re:Docket 205 and Docket 206

Jennifer Haltom Doan, Esq, Opposing Counselors, et al;

For Haltom and Doan this is EXTREMELY pertinent and particularly for Jennifer Haltom Doan, Esq.

Ms Doan Esq entered

http://open.salon.com/blog/curtisneeley/2010/08/06/sept_14 is a day that will live in infamy into evidence as a PDF and may not have noticed that the default result for Acrobat was converting all text that was a full URL into a PDF link. Mr Neeley will argue that Ms Doan Esq was aware that the software used to convert the HTML into a wire communication PDF caused all text URLs to become links whether they were links in the converted HTML or were not. The rational for this Acrobat default is not within the scope of this email or the scope of the common intellect for any attorney, judge, or juror.

Mr Neeley decided not to make the links live in his PDF that was a result of google.com/search?q=Internet+Service+Provider due to a conversion from screenshots and to emphasize the Jennifer Haltom Doan Esq fraud . The HTML entered into evidence should have been presented as the PDF like from the following URL with the fact that all blue text was hyperlinked text.

The following files are text searchable except for page 2.

http://www.curtisneeley.com/NameMedia/docketPDFs/opensalonblog_post.pdf

http://www.curtisneeley.com/NameMedia/docketPDFs/opensalonblog_post_CC.pdf

<<Evidence quality certified file

This of course, would be too honest for an attorney to allow. It would expose the Jennifer Haltom Doan Esq fraud and not require Mr Neeley to point it out as he did in Docket 206. Mr Neeley warned Opposing Counselors just as Jesus asked the money-changers to leave before turning over their tables and driving the livestock out of the temple. This is described in Matthew 21:12, Mark 11:15, John 2:15. It is described in more detail where Jesus made a whip out of cords and drove them out in the book of John. Mr Neeley warned each of you as well as Honorable Jimm Larry Hendren that law is either logical or it is wrong. Mr Neeley gathers every cord around.

Jennifer Haltom Doan, Esq entered that the Wikipedia Creative Commons license was granted by Mr Neeley but then wore blinders that prevented her from reading the disclaimer that moral rights were not waived. It is, in fact, restated in the exhibit she entered. Jennifer Haltom Doan, Esq pointed out that attribution was required but did not point out that moral rights were reserved. Did Jennifer Haltom Doan, Esq not notice this

or were her blinders on too tightly? Attorneys regularly "mislead" juries when representing guilty clients who plead innocent. Do not bring a slingshot to battle unless God leads you to act. Pray before you file.

http://courts.state.ar.us/rules/current_ark_prof_conduct/integrity/profcond8_4.cfm

The LINK above describes Rule 8.4. For sections (a)(c)(d)(e)(f), Jennifer Haltom Doan, Esq and every Opposing Counselor is guilty without any question. The wire fraud crime is not yet enforced so (b) does not apply. There was no link when the PDF was made and there is no link now on the webpage. The fact that EVERY thumbnail shown by <images.google.com> is actually on a server owned by Google Inc is hidden very well by use of the JavaScript that is used by most browsers on the page. Jennifer Haltom Doan, Esq can allege she was deceived by her client that the image was shown because of Mr Neeley's post. Jennifer Haltom Doan, Esq will now face complaints to the ARKANSAS SUPREME COURT COMMITTEE ON PROFESSIONAL CONDUCT with a well done grievance form. Consider this Mr Neeley gathering cords.

Jennifer Haltom Doan, Esq may enter an amendment Docket 205 in 21 days where the repetitive FRAUDS are removed but it does not remove the deceptions that will be evidence entered in the Professional Conduct Grievance. Honorable Jimm Larry Hendren is much more insulated from impeachment than State judges but Honorable Jimm Larry Hendren will be a campaign issue for the next elections. How old is too old to continue to wear the crown or robe? How irrelevant must your formative life experiences be?

Jennifer Haltom Doan, Esq will face a grievance but nothing is likely to happen. Nobody filed anything today.

The non-profit search engine where profits offset taxes will happen as a result of this litigation. Mr Neeley can build a search engine and the sleepspot.com software can be modified. Mr Neeley has almost figure it out. What was Google Inc doing about the time SleepSpot.com was beginning?

<http://web.archive.org/web/19991128214815/www.google.com/pressrel/pressrelease4.html>

Sincerely,

Curtis J Neeley Jr, MFA
www.CurtisNeeley.com

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This is not a private wire communication.

From: Curtis Neeley Jr. [Curtis@CurtisNeeley.com]
Sent: Wednesday, November 10, 2010 9:09 PM
To: Josh Thane; Jennifer Doan; Hwallen; Brooks Christopher White; Mpage
Subject: Deception 5

Jennifer H. Doan, Esq, et al

Mr Neeley did not include the deception that is a wire fraud where Jennifer H. Doan, Esq stated the penis "art" was not on a Google server. This deception was not entered in Docket 206 but will be included in the grievance where Mr Neeley calls the lie an intentional deception and an attempt to influence the Court.

Maybe Jennifer H. Doan, Esq really did not know?

Jennifer H. Doan, Esq will learn before this is over regardless of what Honorable Jimm Larry Hendren tries to certify.

Jennifer H. Doan, Esq gets 21 days safe harbor to lie? This additional rational might be filed later this week.

Filing is not as easy for Mr Neeley. Please remove the lie so that Mr Neeley does not need to point it out in a supplemental filing.

<http://t2.gstatic.com/images?q=tbn:ANd9GcRxqbwjmjgnx1NCwFj0UjcjkZySKDGkpDPV-iwjhLyaE1yd36jw&t=1&usq= J0Zm3 NwyjOkvytEkpvrvaY7MFY>

Mr Neeley stopped at four frauds due to not studying 205 quite enough.

Incessant sounds less friendly than determined or repeated but Jennifer H. Doan, Esq was aware of this.

Have a nice day,

Curtis J Neeley Jr, MFA
www.CurtisNeeley.com

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This is not yet published but will be soon.

From: Curtis Neeley Jr. [Curtis@CurtisNeeley.com]
Sent: Sunday, November 14, 2010 6:26 PM
To: Josh Thane; Jennifer Doan; Hwallen; Brooks Christopher White; Mpage

Jennifer H Doan Esq, opposing Counselors, et al,

The Plaintiff hopes you have all enjoyed the weekend. Jennifer H Doan Esq must now either correct the filed deceptions in Docket 205 or face a motion for Rule 11 sanctions on 11/27/2010. It is now too late to avoid a grievance being filed for violations of Rule 8.4 already. The claim is included below. Nothing is likely to happen except lawyers closing ranks with Honorable Jimm Larry Hendren. Certifying that the Plaintiff is not acting in good faith will fall on its face whether done or not done.

If Honorable Jimm Larry Hendren does not allow claims and the FCC to be joined an interlocutory IFP appeal to the Eighth Circuit will be filed and will be granted including adding all parties and claims once still pending. The Plaintiff has already spoken with the Eighth Circuit and is aware of the result. This is Honorable Jimm Larry Hendren's last chance to anchor a legacy in this case in a good moral position. The plaintiff will request this trial be assigned to another judge because of Honorable Jimm Larry Hendren's lack of logic and lack of familiarity with wire communications called the Internet. The Plaintiff sought that Honorable Jimm Larry Hendren recuse himself and retire soon.

Jennifer H Doan Esq inserted a link into the PDF that was not a link on the Internet. Fix the deception or do not, the complaint has been made to the ARKANSAS SUPREME COURT COMMITTEE ON PROFESSIONAL CONDUCT. It might keep Honorable Jimm Larry Hendren from being deceived. Deceiving Honorable Jimm Larry Hendren, however, appears to occur whether done by another or as a result of his logical disabilities or brain injuries caused by age.

The Plaintiff hopes Honorable Jimm Larry Hendren enjoyed the lesson about "*Dennis Factors*" included in Docket 204 and feel only a senile mentality could deny that they are anything besides "Moore Factor" frauds used by an angry judge. The Plaintiff hopes Jennifer H Doan Esq is punished for the deceptions revealed in Plaintiff's Docket 206 entered because the Supreme Court committee on professional conduct advised Plaintiff they can use docket number references and not need them reprinted. Jennifer H Doan Esq should now be aware of what US Title 47 § 230 protects and why GOOG is not protected by it? Did Docket 206 "REVIEW OF THE WIRE FRAUDS of Docket 205" subsection I (Fraudulent Claim of Being an Internet Service Provider) provide enough of an explanation and was Jennifer H Doan Esq aware that the link URLs entered in Docket 208 are all hosted on GOOG servers? Ignorance is now all it can be because counselors are all now aware GOOG is a content provider harvesting content it feels will be profitable to rebroadcast. Opposing Counselors may click on the links below to see

images hosted on a server ran by GOOG in case that fact was not yet noticed due to GOOG hiding this fact with JavaScript. The three letter colloquial term for a false statement was not used to please the ruling judge. An 'L' followed by two vowels mentioned in the 'i' before 'e' except after 'c' spelling aid phrase is what Docket 205 was.

1. See t0.gstatic.com/images?q=tbn:HPUwMzLwXkxBeM:
2. See t1.gstatic.com/images?q=tbn:tHLdXKv3KF7rhM:
3. See t3.gstatic.com/images?q=tbn:IPf35ZS2eGI6xM:
4. See t2.gstatic.com/images?q=tbn:xmzegLZO45ZMNM:
5. See t3.gstatic.com/images?q=tbn:hmftS5UUBYe7M:
6. See t2.gstatic.com/images?q=tbn:j_b25PrCezz57M:
7. See t1.gstatic.com/images?q=tbn:KqH1Ka9Vnj7v4M:
8. See t0.gstatic.com/images?q=tbn:EePUXfFA6gnf9M:
9. See t0.gstatic.com/images?q=tbn:s3QMwWPed2CquM:
10. See t2.gstatic.com/images?q=tbn:7OheR7Ffo0uhuM:
11. See t3.gstatic.com/images?q=tbn:xgkzrYc-6P6bZM:
12. See t1.gstatic.com/images?q=tbn:3DK52DmXETHMRM:
13. See t2.gstatic.com/images?q=tbn:eOJGxuJZh4Ja_M:
14. See t3.gstatic.com/images?q=tbn:h3YLuGTeCEPhUM:
15. See t1.gstatic.com/images?q=tbn:4RCZviB3NAxt1M:
16. See t0.gstatic.com/images?q=tbn:JfC8w5NdjwKEbM:
17. See t3.gstatic.com/images?q=tbn:srDrbo3AAH_VYM:

The URLs above are COPIES of indecent content being provided by GOOG regardless of what Internet Service Provider opposing counselors are now using to learn that the claims in Docket 205 were deceptive.

Google Inc is the content provider and NOT an ISP. <<<Please note this and correct the deceptions in Docket 205.

Honorable Jimm Larry Hendren's legacy and the reputation of Jennifer H Doan Esq will be impacted by this proceeding and already have been significantly. Just google their names and see what you get. The above URLs will be HTML links in this email but will be removed as links in the Open Salon BLOG post. If Jennifer H Doan Esq or other counselor makes a PDF from it, please do not add links like done previously. Acrobat does not add links without the www. The rational for this is beyond the scope of this email or the scope of a regular lawyer or judge's intellect. Certified PDFs are created and will be evidence quality and if needed will be printed and entered. The explanation of a certified PDF when contrasted to an uncertified PDF is beyond the scope of this email or the scope of a regular lawyer or judge's intellect. It will be explained carefully to the AR JURY.

Five thousand million is much less than an jury is likely to award. Present that offer to Eric Schmidt please and prepare him to explain why he rejected the offer to a JURY. The punitive damages claim will go a long way towards balancing the budget and will be the new highest damages awarded in history.

Curtis J Neeley Jr, MFA
www.CurtisNeeley.com

DISCLAIMER: Curtis Neeley suffered a severe traumatic brain injury that often very negatively impacts his communications. He is often perceived as blunt, tactless, self-centered and rude. Although Curtis has a severe disability, he is determined to continue creating meaningful visual art. The Curtis Neeley Foundation will be created to preserve and promote his artistic photographic legacy.

In (5:09-cv-05151-JLH) in Docket 205 Jennifer Haltom Doan Esq filed several dishonest claims that violated Rule 8.4 of the Rules for Professional Conduct for Arkansas attorneys. Jennifer Haltom Doan Esq claimed that her client Google Inc was an Internet service provider and this is a deceptive claim because Google Inc does not provide Internet connectivity and sells "Internet Service Provider" as keywords in AdWords to numerous Internet service providers and profits on businesses that actually sell connectivity. Jennifer Haltom Doan Esq made a PDF from a webpage using software that made all full URLs into links including those that were not actually links on the webpage. Jennifer Haltom Doan Esq then used this deceptive PDF as an exhibit to support a fraudulent claim that the Plaintiff had a link to an indecent U_nR_eguL_ated (URL) wire location that resulted in wire communications of an explicit erect penis photograph and implied that an objection to display of this photograph was rational that supported display of the photograph as is obviously incorrect. The ruling judge in the Western District of Arkansas, Honorable Jimm Larry Hendren, has been a judge in the Western District of Arkansas since before the Internet existed and is very likely to be unfamiliar with wire communications called the Internet. Jennifer Haltom Doan Esq has advised her client that the logical difficulties already demonstrated in this case by Honorable Jimm Larry Hendren mean the Court is not likely to notice the lack of a link on the webpage that was added to Docket 205 (Attachment: # 1 Exhibit A) by the Counselor. Honorable Jimm Larry Hendren was/is nearly certain to believe the fraud that Google Inc is an ISP and is therefore exempted from liability as an ISP by US Title 47 § 230 as deceptively stated by Jennifer Haltom Doan Esq in violation of the Rules of Professional Conduct for Arkansas lawyers. The Plaintiff making this grievance generally despises lawyers. Curtis J Neeley Jr. is certain that deception of a ruling Judge and dishonesty is the primary mission of one lawyer in every case because Courts are used to decide who is right when both can't be correct. This complaint is likely to result in four lawyers closing ranks to protect one of their own and very little is expected to be actually done.

From: Curtis Neeley Jr. [Curtis@CurtisNeeley.com]
Sent: Sunday, November 14, 2010 7:19 PM
To: Josh Thane; Jennifer Doan; Hwallen; Brooks Christopher White; Mpage
Subject: What is an ISP?
Attachments: What is an ISP_CC.pdf; What is an ISP+link_CC.pdf

The Plaintiff has now verified that Acrobat 7 Professional adds an invisible link rectangle from an unlinked URL by default but this is triggered by an X =~ \$www\.\d*\.\ pattern match. Where X is any word on a page. The logic of this is beyond even the most intellectual judge or attorney but this gives Jennifer H Doan Esq an escape story for entering a fraud into evidence. I do not know Jennifer H Doan Esq and give her the benefit of a belief of perhaps creating the PDF with Acrobat and then looking and believing the link was there originally.

It is either that or Jennifer H Doan Esq misled Honorable Jimm Larry Hendren intentionally.

This is an option that might redeem Counselor's integrity even if it is not true. The BLOG entry without (www) does not default to a link but it can be added. Examples are attached.

Please do not add links like was added to Michael Peven's penis photo from http://open.salon.com/blog/curtisneeley/2010/08/06/sept_14_is_a_day_that_will_live_in_infamy in the future.

Use a screen shot to avoid it.

You are forgiven in case you were deceived by the Acrobat default.

This is not publicly posted due to the fact that it gives Jennifer H Doan Esq a defense to use even if she must use it in spite of her intent to deceive the Court. She can lie and be redeemed. Unless she corrects her fraud Jennifer H Doan Esq joins GOOG in immorality. Now would be a good time to no longer represent GOOG as they are indefensible.

From: Curtis Neeley Jr. [Curtis@CurtisNeeley.com]
Sent: Monday, November 15, 2010 10:21 AM
To: Josh Thane; Jennifer Doan; Hwallen; Brooks Christopher White; Mpage

The court expresses its appreciation to Jennifer Haltom Doan, Esq., of Texarkana, who is term-limited, for her many years of valuable service to this committee.

http://courts.arkansas.gov/court_opinions/sc/2008b/20081211/20081211.htm

In Re: Appointments to the Supreme Court Committee on Model Jury Instructions—Civil See **per curiam** this date. (1 PAGE PUBLISHED) [HTML, WP5.1]

Jennifer Haltom Doan, Esq., of Texarkana, is hereby appointed to the Supreme Court Committee on Model Jury Instructions-Civil for a three-year term to expire on April 30, 2005. The Honorable Kim Smith, Circuit Judge of Fayetteville, Donis Hamilton, Esq., of Paragould, and Paul Rainwater, Esq., of Crossett, are hereby reappointed to the Committee for three-year terms to expire April 30, 2005.

<https://courts.arkansas.gov/opinions/20020425.htm>

Jennifer H Doan Esq has already been impacted. Mr Neeley can write a search engine "software" in his sleep.

1. <http://www.bing.com/search?q=Jennifer+Haltom+Doan+Esq>
2. <http://search.yahoo.com/search?p=Jennifer+Haltom+Doan+Esq>
3. <http://www.google.com/search?q=Jennifer+Haltom+Doan+Esq>
4. <http://www.ask.com/web?q=Jennifer+Haltom+Doan+Esq>

Honorable Jimm Larry Hendren's name was not used by Mr Neeley until this morning but will be impacted now very soon. His chance to be immoral silently is now OVER.

1. <http://www.ask.com/web?q=honorable+Jimm+Larry+Hendren>
2. <http://search.yahoo.com/search?p=honorable+Jimm+Larry+Hendren>
3. <http://www.bing.com/search?q=honorable+Jimm+Larry+Hendren>
4. <http://www.google.com/search?q=honorable+Jimm+Larry+Hendren>

Curtis J Neeley Jr, MFA

DISCLAIMER: Curtis Neeley suffered a severe traumatic brain injury that often very negatively impacts his communications. He is often perceived as blunt, tactless, self-centered and rude. Although Curtis has a severe disability, he is determined to continue creating meaningful visual art. The Curtis Neeley Foundation will be created to preserve and promote his artistic photographic legacy.

From: Curtis Neeley Jr. [Curtis@CurtisNeeley.com]
Sent: Sunday, November 21, 2010 9:10 PM
To: Josh Thane; Jennifer Doan; Hwallen; Brooks Christopher White; Mpage
Subject: NOT CONFIDENTIAL -Txxxx-7xxx Jennifer Haltom Doan Esq
Attachments: NOT CONFIDENTIAL -Txxxx-7xxx Jennifer Haltom Doan Esq.pdf; NOT CONFIDENTIAL -Txxxx-7xxx Jennifer Haltom Doan Esq_.pdf

Counselor,

The fact that Mr Neeley filed a grievance with your office is public knowledge at this point. Your involvement will remain confidential but the FACT that Mr Neeley reported the blatant violation of Canon 8.4 is not confidential.

[http://open.salon.com/blog/CurtisNeeley/2010/11/15/ennifer h doan esq opposing counselors et al](http://open.salon.com/blog/CurtisNeeley/2010/11/15/ennifer_h_doan_esq_opposing_counselors_et_al)

I disagree with the secrecy with which lawyers function as their own police. The fact that you want to wait until Honorable Jimm Larry Hendren's senility is demonstrated further before acting only underscores Mr Neeley's argument that what is ethical for attorneys and judges depends on what is allowed by their peers. Jennifer Haltom Doan Esq has until 11-27-2010 to leave her deception uncorrected before I move for sanctions. It is not a matter that needs much investigating to see that

[open.salon.com/blog/CurtisNeeley/2010/08/06/sept 14](http://open.salon.com/blog/CurtisNeeley/2010/08/06/sept_14) is a day that will live in infamy

was entered into evidence as Docket 205 Exhibit A but was modified so that there was an invisible link to Michael Peven's erect penis photo where there is no link above. The text is not blue as it would have been had the link not been added by Acrobat or other software. This could be excused had Jennifer Haltom Doan Esq not accused Mr Neeley of placing the link he complained of in Docket 205 and other deceptions as follows from page three and four listed except with deceptions underlined:

1. *The work that offends him is not published by Google and is not located on Google's servers.*
2. *And what is this website? It is Mr. Neeley's own blog site, at Salon.com, in which Mr. Neeley himself placed a link to Mr. Peven's work. See Exhibit A, print out from Curtis Neeley's Open Salon.com blog.*
3. *Google, however, is an Internet Service Provider, and because Mr. Neeley is complaining about a work created and placed on the Internet by others (Mr. Peven, his publisher, the bookstore, and his own blog), any state law claim against Google is absolutely preempted by the Communications Decency Act, 47 U.S.C. § 230 ("No provider or user of an interactive computer service shall be treated as the publisher or speaker of any information provided by another information content provider");*

Please examine the three obvious deceptions above. 1.) Google Inc owns the gstatic.com server. 2.) Google Inc does not sell connectivity and is not an ISP by any stretch of the English language. 3.) There is no link to Michael Peven's erect penis photograph and the LINKs below will not be links on the Open SALong BLOG or the Wordpress BLOG or the Livejournal BLOG. The first 17 URLs below will be links in this wire communication called an email. 18, 19, 20 will NOT be links. Jennifer Haltom Doan Esq, do you understand the three deceptions and are you able to see the difference? 10 will be a LINK in this wire communication 19, 20, 21 are not LINKS in it and yet 21 will default to a link when converted in Acrobat to a PDF. This is done to illustrate what the Plaintiff hopes caused the Jennifer Haltom Doan Esq deception. Mr Neeley used Acrobat to generate a PDF from the BLOG entry to determine if Jennifer Haltom Doan Esq added the link intentionally. Mr Neeley has invested much more than due diligence good faith research.

1. See t0.gstatic.com/images?q=tbn:HPUwMzLwXkxBeM
2. See t1.gstatic.com/images?q=tbn:tHLdXKv3KF7rhM
3. See t3.gstatic.com/images?q=tbn:IPf35ZS2eGI6xM
4. See t2.gstatic.com/images?q=tbn:xmzegLZO45ZMNM
5. See t3.gstatic.com/images?q=tbn:hmftS5UUBYe7M
6. See t2.gstatic.com/images?q=tbn:j_b25PrCezz57M
7. See t1.gstatic.com/images?q=tbn:KqH1Ka9Vnj7v4M
8. See t0.gstatic.com/images?q=tbn:EePUXfFA6gnf9M
9. See t0.gstatic.com/images?q=tbn:s3QMcWPed2CquM
10. See t2.gstatic.com/images?q=tbn:7OheR7Ffo0uhuM
11. See t3.gstatic.com/images?q=tbn:xgkzrYc-6P6bZM
12. See t1.gstatic.com/images?q=tbn:3DK52DmXETHMRM
13. See t2.gstatic.com/images?q=tbn:eOJGxuJZh4Ja_M
14. See t3.gstatic.com/images?q=tbn:h3YLuGTeCEPhUM
15. See t1.gstatic.com/images?q=tbn:4RCZviB3NAxt1M
16. See t0.gstatic.com/images?q=tbn:JfC8w5NdjwKEbM
17. See t3.gstatic.com/images?q=tbn:srDrbo3AAH_VYM
18. See t3.gstatic.com/images?q=tbn:srDrbo3AAH_VYM
19. See t2.gstatic.com/images?q=tbn:7OheR7Ffo0uhuM
20. See t2.gstatic.com/images?q=tbn:7OheR7Ffo0uhuM
21. See <http://t2.gstatic.com/images?q=tbn:7OheR7Ffo0uhuM>

Google Inc uses deceptive ICANN INC contact data and controls <gstatic.com> and is therefore nothing but a content provider. The wire locations above 1-9 are original nudes created by the Plaintiff displayed from Google Inc servers and URL 10 is Michael Peven's erect penis photograph. URLs 11-17 are illicit pornographic photographs of Teri Weigel performing fellatio or posing with a penis. 18-21 above are not links but are the full URLs of pornography. This wire communication is public. So is every other docket entry. Acrobat will insert an invisible link for number 21 and gives Jennifer Haltom Doan a way out if she choses to plead ignorance but she should now advise the Court of the error.

<http://www.CurtisNeeley.com/5-09-cv-05151/Docket/index.htm>

Mr Neeley reminds Office of Professional Conduct staff that this WILL NOT BE PRIVATE OR CONFIDENTIAL!

The identity of the attorney who is ignoring the complaint at Office of Professional Conduct was removed to marginally comply with secrecy.

Mr Neeley knows how to appeal as a pauper but a motion to certify not acting in good faith was done and pends with Docket 184 as Docket 196. Mr Neeley will appeal on December 1-7, 2010 whether the Honorable Jimm Larry Hendren tries to prevent it or not. It should not matter if Honorable Jimm Larry Hendren agrees with Mr Neeley on requiring GOOG to stop returning nudes in images searches for "Curtis Neeley" in Docket 184 or does not. The ruling judge has been a judge longer than the Internet has existed as the disguise for wire communications. It is obvious already that the judge is unable to rule logically. How easy is it to see the obvious attempts to deceive done by Jennifer Haltom Doan Esq and how irrelevant is it whether the seventy year old judge is deceived by this or is not? Mr Neeley did not expect action from the Office of Professional Conduct and this is precisely the type response expected.

This will not resolve secretly in the back rooms of courts or the Office of Professional Conduct.

1. www.google.com/search?q=Honorable+Jimm+Larry+Hendren
2. <http://search.yahoo.com/search?p=Honorable+Jimm+Larry+Hendren>
3. <http://www.bing.com/search?q=Honorable+Jimm+Larry+Hendren>
4. <http://www.ask.com/web?q=Honorable+Jimm+Larry+Hendren>
5. <http://www.ask.com/web?q=Jennifer+Haltom+Doan+Esq>
6. <http://www.bing.com/search?q=Jennifer+Haltom+Doan+Esq>
7. <http://search.yahoo.com/search?p=Jennifer+Haltom+Doan+Esq>
8. <http://www.google.com/search?q=Jennifer+Haltom+Doan+Esq>

Mr Neeley could once write database software that makes all search engines look basic. The Plaintiff's severe traumatic brain injury made him unable to understand SleepSpot v1.7 but it was a more robust database engine than possible using Windows. SleepSpot v1.7 was not Y2K ready and may take years to restore to operational.

In closing, Mr Neeley reminds Office of Professional Conduct staff that this WILL NOT BE PRIVATE OR CONFIDENTIAL!

Your identities are completely removed but the strong feelings of disapproval and aversion toward what seems base, mean, or worthless should herein be obvious.

Links to pornographic image CONTENT ON A GOOGLE INC SERVER WILL, HOWEVER, BE REMOVED.

The certified PDFs attached will be the only type PDF that is accepted by the Plaintiff as true.

Mr Neeley will be at the deposition on December 10.

What type questions will be asked? How long will it be?

The text between these lines will not be included by the Plaintiff as public.

Mr Neeley is not opposed to this being in an exhibit.

The second PDF is Acrobat's default for the public blog post adding only a link to 21.

Nobody is noticing but this is going to happen and the FCC will regulate wire communications by 2012.

-----Original but edited Message-----

From: [xxxxxxx@aransaov]

Sent: Sunday, November 21, 2010 2:37 PM

To: 'curtis@cureley.com'

Cc: XXXxxxx

Subject: CONFIDENTIAL - Our file xxxx-xxxx Jennifer Doan

Mr. Neeley, this new file was assigned to me yesterday. After a bit of on-line research, I respond. + . .

....+ the file shows you know your way to the Eighth Circuit and the US Supreme Court.

....+ .

Arkansas Supreme Court
Office of Professional Conduct
Justice Bldg, Room 110
625 Marshall Street
Little Rock, AR 72201-1054

From: Curtis Neeley Jr. [Curtis@CurtisNeeley.com]
Sent: Monday, November 22, 2010 3:03 PM
To: Mpage; Brooks Christopher White; Hwallen; Jennifer Doan; Josh Thane
Subject: Respectfully disagreeing with Jennifer Haltom Doan Esq and Honorable Jimm Larry Hendren.

Factual basis for evidence of senility of Honorable Jimm Larry Hendren.

Honorable Jimm Larry Hendren demonstrated unusually keen rational in the seventeen page ruling of Counts et ux. v. Cedarville School Board, (02-2455) in 2003. This case dealt with student's First Amendment Rights being violated at school. Herein Honorable Jimm Larry Hendren recognized that speech could be maligned by requiring special permission to exercise. Mr Neeley's children may simply type in "Curtis Neeley" in image searches at <images.google.com> and nude images will result even with safe search filtering enabled. The only rational Google Inc has stated for display of these nudes is that Mr Neeley did them and gave some of them to WikiMedia with a CC-SA-3 creative commons license. The effect of the Google Inc claim conflates to the statement by Google Inc CEO on CNBC of, "if there is something you do not want known, you best just not do it". This claim flies in the face of Honorable Jimm Larry Hendren's claim that stigmatizing a book by requiring special permission is unconstitutional. Google Inc has caused image searches of "Curtis Neeley" to be stigmatized in spite of complaints and DMCA notifications that it was offensive when nudes created by Mr Neeley were displayed to minor children, atheists, or Muslims.

Honorable Jimm Larry Hendren's seventeen page ruling has been cited as precedent repeatedly and is a ruling that flies in the face of numerous docket entries from this case in 2010. The ruling is only seven years later and the changes of mental abilities due to age, whether decrease or increase, is not easily measured or quantified. Mr Neeley was ruled an incompetent in 2003 and was not even his own guardian. Mr Neeley's mental abilities have easily changed more than any human on Earth including Honorable Jimm Larry Hendren since 2003. Mr Neeley hopes that Honorable Jimm Larry Hendren is soon able to retire and enjoy the end of his life, but is extremely familiar with having rational questioned due to mental disability. Mr Neeley has empathy for Honorable Jimm Larry Hendren adapting to mental changes caused by senility and not sympathy. There is a significant differentiation. Mr Neeley is unable to remember most of his past yet has a mind full of knowledge he is unable to explain. The progression of senility may have a parabolic or logarithmic decrease instead of a linear decrease when senility begins to have an impact. This is Mr Neeley's contention as well as stating that intellectual decreases are usually offset by increases in wisdom that only age can give. Mr Neeley contends that increases in wisdom that occur are generally linear and measured constantly in schools.

Mr Neeley has resolved to be respectful of everyone whether agreeing with them or disagreeing. The merits of Mr Neeley's claim against Jennifer Haltom Doan Esq and Honorable Jimm Larry Hendren are as obvious to most jurors as $(2 + 2 = 4)$ is obvious to many with Mr Neeley's mental ability. The merits are apparently not obvious to all.

It is obvious to Mr Neeley the only even prime number is also the only prime number divisible by two and this prime is the only prime number that is the sum of two prime numbers. There is also only one number that has the same square and double. This number is the same unique even prime number. This unique prime is the least number of people required to procreate. This number is also the largest number of people who may combine and by doing so procreate. Mr Neeley will behave respectfully of even those he does not morally respect.

This is another public wire communication and is not *ex parte*. There are two attorneys who will receive this as blind carbon copies in addition to this being posted to BLOGs publicly.

The identity to whom this response is addressed remains sacrosanct as a confidential source.

-----Original Message-----

From:

Sent: Monday, November 22, 2010 9:33 AM

To: Jthane; Jdoan; Hwallen; Brooks Christopher White; Mpage

Cc:

Subject: RE: NOT CONFIDENTIAL -Txxxx-7xxx Jennifer Haltom Doan Esq

To Mr. Curtis Neeley or whoever sent this reply for him, I am unsure on what factual basis you allege Judge Hendren is senile. The issues you raise below apparently are before him in pleadings and will be addressed in the course of Mr. Neeley's case or at the jury trial in 2011. I do not see that this issue is one that should be "tried" first in the attorney discipline system, when it is before the court. If you/Mr. Neeley move for sanctions against Ms. Doan, then the issue will be squarely before the court for a ruling. If we must disagree, I hope you and I can respectfully disagree as a matter of process and not on the merits of your allegations against Ms. Doan and also Judge Hendren. Please inform me when your issue is decided in court. Thank you,

PS, it appears those you copied on your reply to me are other defense counsel in the case, so I also copy them. Nancie Givens is the Deputy Director here.

Arkansas Supreme Court
Office of Professional Conduct
Justice Bldg, Room 110
625 Marshall Street
Little Rock, AR 72201-1054

From: Curtis Neeley Jr. [mailto:Curtis@CurtisNeeley.com]

Sent: Sunday, November 21, 2010 9:10 PM

To: Jthane; Jdoan; Hwallen; Brooks Christopher White; Mpage

Subject: NOT CONFIDENTIAL -Txxxx-7xxx Jennifer Haltom Doan Esq

Counselor,

The fact that Mr Neeley filed a grievance with your office is public knowledge at this point. Your involvement will remain confidential but the FACT that Mr Neeley reported the blatant violation of Canon 8.4 is not confidential.

http://open.salon.com/blog/CurtisNeeley/2010/11/15/ennifer_h_doan_esq_opposin_g_counselors_et_al

I disagree with the secrecy with which lawyers function as their own police. The fact that you want to wait until Honorable Jimm Larry Hendren's senility is demonstrated further before acting only underscores Mr Neeley's argument that what is ethical for attorneys and judges depends on what is allowed by their peers. Jennifer Haltom Doan Esq has until 11-27-2010 to leave her deception uncorrected before I move for sanctions. It is not a matter that needs much investigating to see that

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2. *And what is this website? It is Mr. Neeley's own blog site, at Salon.com, in which Mr. Neeley himself placed a link to Mr. Peven's work. See Exhibit A, print out from Curtis Neeley's Open Salon.com blog.*
3. *Google, however, is an Internet Service Provider, and because Mr. Neeley is complaining about a work created and placed on the Internet by others (Mr. Peven, his publisher, the bookstore, and his own blog), any state law claim against Google is absolutely preempted by the Communications Decency Act, 47 U.S.C. § 230 ("No provider or user of an interactive computer service shall be treated as the publisher or speaker of any information provided by another information content provider");*

Please examine the three obvious deceptions above. 1.) Google Inc owns the gstatic.com server. 2.)Google Inc does not sell connectivity and is not an ISP by

any stretch of the English language. 3.) There is no link to Michael Peven's erect penis photograph and the LINKs below will not be links on the Open SALong BLOG or the Wordpress BLOG or the Livejournal BLOG. The first 17 URLs below will be links in this wire communication called an email. 18, 19, 20 will NOT be links. Jennifer Haltom Doan Esq, do you understand the three deceptions and are you able to see the difference? 10 will be a LINK in this wire communication 19, 20, 21 are not LINKS in it and yet 21 will default to a link when converted in Acrobat to a PDF. This is done to illustrate what the Plaintiff hopes caused the Jennifer Haltom Doan Esq deception. Mr Neeley used Acrobat to generate a PDF from the BLOG entry to determine if Jennifer Haltom Doan Esq added the link intentionally. Mr Neeley has invested much more than due diligence good faith research.

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2. See t1.gstatic.com/images?q=tbn:tHLdXKv3KF7rhM
3. See t3.gstatic.com/images?q=tbn:IPf35ZS2eGI6xM
4. See t2.gstatic.com/images?q=tbn:xmzegLZO45ZMNM
5. See t3.gstatic.com/images?q=tbn:hmftS5UUBYe7M
6. See t2.gstatic.com/images?q=tbn:j_b25PrCezz57M
7. See t1.gstatic.com/images?q=tbn:KqH1Ka9Vnj7v4M
8. See t0.gstatic.com/images?q=tbn:EePUXfFA6gnf9M
9. See t0.gstatic.com/images?q=tbn:s3QMcvWPed2CquM
10. See t2.gstatic.com/images?q=tbn:7OheR7Ffo0uhuM
11. See t3.gstatic.com/images?q=tbn:xgkzrYc-6P6bZM
12. See t1.gstatic.com/images?q=tbn:3DK52DmXETHMRM
13. See t2.gstatic.com/images?q=tbn:eOJGxuJZh4Ja_M
14. See t3.gstatic.com/images?q=tbn:h3YLuGTeCEPhUM
15. See t1.gstatic.com/images?q=tbn:4RCZviB3NAxt1M
16. See t0.gstatic.com/images?q=tbn:JfC8w5NdjwKEbM
17. See t3.gstatic.com/images?q=tbn:srDrbo3AAH_VYM
18. See t3.gstatic.com/images?q=tbn:srDrbo3AAH_VYM
19. See t2.gstatic.com/images?q=tbn:7OheR7Ffo0uhuM
20. See t2.gstatic.com/images?q=tbn:7OheR7Ffo0uhuM
21. See <http://t2.gstatic.com/images?q=tbn:7OheR7Ffo0uhuM>

Google Inc uses deceptive ICANN INC contact data and controls <gstatic.com> and is therefore nothing but a content provider. The wire locations above 1-9 are original nudes created by the Plaintiff displayed from Google Inc servers and URL 10 is Michael Peven's erect penis photograph. URLs 11-17 are illicit pornographic photographs of Teri Weigel performing fellatio or posing with a penis. 18-21 above are not links but are the full URLs of pornography. This wire communication is public. So is every other docket entry. Acrobat will insert an invisible link for number 21 and gives Jennifer Haltom Doan a way out if she choses to plead ignorance but she should now advise the Court of the error.

<http://www.CurtisNeeley.com/5-09-cv-05151/Docket/index.htm>

Mr Neeley reminds Office of Professional Conduct staff that this WILL NOT BE PRIVATE OR CONFIDENTIAL!

The identity of the attorney who is ignoring the complaint at Office of Professional Conduct was removed to marginally comply with secrecy.

Mr Neeley knows how to appeal as a pauper but a motion to certify not acting in good faith was done and pends with Docket 184 as Docket 196. Mr Neeley will appeal on December 1-7, 2010 whether the Honorable Jimm Larry Hendren tries to prevent it or not. It should not matter if Honorable Jimm Larry Hendren agrees with Mr Neeley on requiring GOOG to stop returning nudes in images searches for "Curtis Neeley" in Docket 184 or does not. The ruling judge has been a judge longer than the Internet has existed as the disguise for wire communications. It is obvious already that the judge is unable to rule logically. How easy is it to see the obvious attempts to deceive done by Jennifer Haltom Doan Esq and how irrelevant is it whether the seventy year old judge is deceived by this or is not? Mr Neeley did not expect action from the Office of Professional Conduct and this is precisely the type response expected.

This will not resolve secretly in the back rooms of courts or the Office of Professional Conduct.

1. www.google.com/search?q=Honorable+Jimm+Larry+Hendren
2. <http://search.yahoo.com/search?p=Honorable+Jimm+Larry+Hendren>
3. <http://www.bing.com/search?q=Honorable+Jimm+Larry+Hendren>
4. <http://www.ask.com/web?q=Honorable+Jimm+Larry+Hendren>
5. <http://www.ask.com/web?q=Jennifer+Haltom+Doan+Esq>
6. <http://www.bing.com/search?q=Jennifer+Haltom+Doan+Esq>
7. <http://search.yahoo.com/search?p=Jennifer+Haltom+Doan+Esq>
8. <http://www.google.com/search?q=Jennifer+Haltom+Doan+Esq>

Mr Neeley could once write database software that makes all search engines look basic. The Plaintiff's severe traumatic brain injury made him unable to understand SleepSpot v1.7 but it was a more robust database engine than possible using Windows. SleepSpot v1.7 was not Y2K ready and may take years to restore to operational.

In closing, Mr Neeley reminds Office of Professional Conduct staff that this WILL NOT BE PRIVATE OR CONFIDENTIAL!

You identities are completely removed but the strong feelings of disapproval and aversion toward what seems base, mean, or worthless should herein be obvious.

Links to pornographic image CONTENT ON A GOOGLE INC SERVER WILL, HOWEVER, BE REMOVED.

The certified PDFs attached will be the only type PDF that is accepted by the Plaintiff as true.

Mr Neeley will be at the deposition on December 10.

What type questions will be asked? How long will it be?

The text between these lines will not be included by the Plaintiff as public.

Mr Neeley is not opposed to this being in an exhibit.

The second PDF is Acrobat's default for the public blog post adding only a link to 21.

Nobody is noticing but this is going to happen and the FCC will regulate wire communications by 2012.

-----Original but edited Message-----

From: [xxxxxxx@aransaov]

Sent: Sunday, November 21, 2010 2:37 PM

To: 'curtis@cureley.com'

Cc: XXXxxxx

Subject: CONFIDENTIAL - Our file xxxx-xxxx Jennifer Doan

Mr. Neeley, this new file was assigned to me yesterday. After a bit of on-line research, I respond. + . .
....+ the file shows you know your way to the Eighth Circuit and the US Supreme Court.

....+ .

Arkansas Supreme Court
Office of Professional Conduct
Justice Bldg, Room 110
625 Marshall Street
Little Rock, AR 72201-1054

From: Curtis Neeley Jr. [Curtis@CurtisNeeley.com]
Sent: Monday, November 22, 2010 8:37 PM
To: Michael Page; Brooks C. White; Hwallen; Jennifer Doan
Subject: RE: Deposition

Michael H Page Esq, Brooks Christopher White Esq, et al,

To clarify; Have Google Inc and NAMEMEDIA INC learned the definition of good faith? Each of you are likely to now be aware the three parties desired added previously in Docket 184 have already complied with most of the Plaintiff's demands to cease displaying nudes done by him as a result of image searches of "Curtis Neeley" without even being allowed added as parties because of a sanction called "Dennis Factors" for disguise by Honorable Jimm Larry Hendren.

Michael H Page Esq, Did you notice that Brooks Christopher White Esq created Federal Rules of CP 24(A)(3) in Docket 197? Two paid attorneys can read Dockets (201,204) and text search these in contrast to Dockets (196,197) that were filed as line art and marginally complied with the EF/ECM manual and was not done in good faith. Federal Rules of CP 24(A)(3) do not exist to prevent you from wasting time looking for the referenced rule from Docket 197 in the ¶ that appears first after "stated as follows:" that is NOT numbered.

Have either of you read Dennis v. Dillard Department Stores, Inc., 207 F.3d 523, 525 (8th Cir. 2000) or Foman v. Davis, 371 U.S. 178, 182 (1962)? Mr Neeley has as you can see in Docket 204. Either dismiss your joint motion to certify Mr Neeley is not acting in good faith by November 26 or join Jennifer Haltom Doan Esq in the motion for Rule 11 sanctions. Mr Neeley filed a grievance with the Arkansas Office of Professional Conduct regarding Jennifer Haltom Doan Esq already and may request Rule 11 sanctions for her deceptions regardless of the result.

Michael H Page Esq are you aware of what an internet service provider (ISP) is? Are you aware of who owns www.gstatic.com. Did you realize that Jennifer Haltom Doan Esq claimed Michael Peven's erect penis photograph was not on a Google Inc server? The default 404 error discloses the owner as Google Inc.

Michael H Page Esq is aware Google Inc alleges only cataloging the Internet yet Google Inc harvests content across the Internet and rebroadcast it to sell. Michael H Page Esq is aware of this and yet allowed Jennifer Haltom Doan Esq to deceive the seventy year old judge, Honorable Jimm Larry Hendren, realizing it would probably easily succeed. On second review of Docket 205 it appears Michael H Page Esq was not only aware of the deceptions entered by Jennifer Haltom Doan Esq but Michael H Page Esq is listed on page six as supporting the frauds. The Plaintiff and Honorable Jimm Larry Hendren might

believe Michael H Page Esq signed Docket 205 at first glance. Using much more than good faith, the Plaintiff realized this is incorrect. Michael H Page Esq would otherwise already face a grievance like Jennifer Haltom Doan Esq already does.

To clarify and in closing; Michael H Page Esq allegedly joined H William Allen Esq and Brooks Christopher White Esq in Docket 196 and was listed but did not sign as required by the Federal Rules of CP Rule 11. Either withdraw the malicious motion, sign it, or face another separate motion for sanctions on Wednesday December 1, 2010 along with Jennifer Haltom Doan.

Mr Neeley has a severe speech impediment but is now able to speak acceptably after speech therapy. Mr Neeley's speech is not, however, consistent with his intellect. Mr Neeley will use a ROHO pressure mitigating seat cushion and will use a catheter leg bag that can be emptied. Would you like to generally describe the types of questions Mr Neeley will face? Either way, he will make a good faith attempt to answer. Mr Neeley intends to call Eric Schmidt, Hanna Thiem, and the gentleman who alleged Mr Neeley called regarding <eartheye.com> as witnesses during trial. Would Eric Schmidt be receptive to attending the deposition 12/10/2010?

Mr Neeley does not look forward to a deposition but will give as much time as is needed and will remain as long as needed and can get home from the location by wheelchair, weather permitting, and will call a friend to drive if it exceeds the time Mr Neeley's regular attendant can work.

Curtis J Neeley Jr, MFA
www.CurtisNeeley.com

DISCLAIMER: Curtis Neeley suffered a severe traumatic brain injury that often very negatively impacts his communications. He is often perceived as blunt, tactless, self-centered and rude. Although Curtis has a severe disability, he is determined to continue creating meaningful visual art. The Curtis Neeley Foundation will be created to preserve and promote his artistic photographic legacy.

-----Original Message-----

From: Michael Page []
Sent: Monday, November 22, 2010 11:12 AM
To: Brooks C. White; CurtisNeeley.com
Cc: Jennifer Doan
Subject: RE: Deposition

To clarify, Google will also have questions for you. The federal rules provide that we are entitled to a total 7 hours of on-the-record time, but we will of course try to get done in less time if possible.

From: Brooks C. White []
Sent: Monday, November 22, 2010 8:04 AM
To: CurtisNeeley.com
Cc: Jennifer Doan; Michael Page
Subject: Deposition

Mr. Neeley:

In a recent email you asked how long the deposition would take. Though it is not possible to give a precise estimate of how long it will take, you should be prepared to be there until 4:30 on the 10th. However, we reserve the right to continue the deposition if we do not finish it by 4:30 on the 10th.

Thank you,

Brooks White

ALLEN LAW FIRM, P.C.
212 Center Street
9th Floor
Little Rock, Arkansas 72201
(501) 374-7100
(501) 374-1611 FAX
email: xxx@allenlawfirmnpc.com

Exhibit 2

HALTOM & DOAN

TRIAL & APPELLATE COUNSEL
Practicing in Texas & Arkansas

6500 Summerhill Road, Suite 100, Texarkana, Texas 75503
Mailing: P. O. Box 6227, Texarkana, Texas 75505-6227
903.255.1000 www.haltomdoan.com 903.255.0800 (fax)

Jennifer H. Doan

Board Certified – Civil Trial Law
Board Certified – Personal Injury Trial Law
Texas Board of Legal Specialization

Direct Dial: 903-255-1002
jdoan@haltomdoan.com

November 24, 2010

Via Certified Mail RRR No. 91-7108 2133 3937 7408 1270

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

Re: *Curtis J. Neeley, Jr. v. NameMedia, Inc., Network Solutions, Inc., and Google, Inc.*, in the United States District Court for the Western District of Arkansas, Fayetteville Division, Civil No. 09-5151

Mr. Neeley:

I write to address your recent flurry of emails. Please note that, I have the upmost respect for the professional codes of conduct. As a licensed attorney, I am sworn to uphold the code of conduct, to endeavor to always advance justice, and to defend the rights of my clients. That being said, your assertions and threats to file Rule 11 sanctions against me personally, as well as your recently filed grievance, are unwarranted.

You indicate that you disagree with the statements made on behalf of my client in Docket No. 205 and its attached Exhibit A that were filed in the referenced case. Your interpretations and statements regarding those documents, however, are misplaced. Each are addressed below.

First, you allege that I personally changed text on your blog to make it a link and deceive the Court. That is not true. I have not added to, taken away from, or changed any text on your blog. Instead, your entire blog was merely converted by Adobe Acrobat to a PDF so that it could be properly attached to the pleading. Exhibit A to Docket Number 205 correctly displays your blog, which provides the address to vampandtramp.com website on which Mr. Peven's work appears. Indeed, the website address is referenced twice in your August 6, 2010 post, which was attached to Docket Number 205 as Exhibit A. While I am unable to determine whether there was a direct hyperlink to <http://www.vampandtramp.com/finepress/p/primitive-manmade-blueL.jpg> in your original blog post, the fact remains that the address was entered on your personal blog. That is the

91 7108 2133 3937 7408 1270

Curtis Neeley

Page 2

November 24, 2010

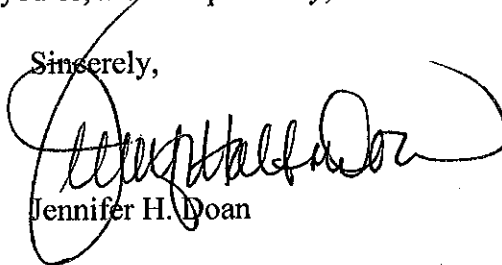
issue – not whether the link was “live.” Further, the User’s Manual for the Western District of Arkansas CM/ECF System requires that all documents be converted to PDF format before filing them with the Court. Whether or not the conversion to PDF, as required by the Court, caused the link to become “live” is irrelevant. The correlation between you and Mr. Peven’s work still derives from your personal blog – that is something I did not create or change.

Second, contrary to your assertions, Google Inc. is protected under 47 U.S.C. § 230 of the Communications Decency Act as an internet services provider. Indeed, courts have held that claims against Google Inc. for not addressing “harmful content” allegations are barred by 47 U.S.C. § 230. *See, e.g., Goddard v. Google*, 640 F. Supp. 2d 1193 (N.D. Cal. 2009); *Parker v. Google, Inc.*, 242 Fed. Appx. 833, 837 (3rd Cir. 2007). Respectfully, your assertions are contrary to the law.

Third, you have taken out of context the fact that Mr. Peven’s work is not located on Google’s servers as the publisher of the content. Google is not the publisher or provider of Mr. Peven’s work. Although the images displayed as the result of a Google Images search are indexed through a Google server in order to provide search results to the public, the association of Mr. Peven’s work with the search terms “Curtis Neeley” was not the product of the image being located on a Google server. Mr. Peven’s work was published by a third-party and appears as part of a web-based advertisement for Vamp and Tramp Booksellers.

Finally, your assertion that I have committed professional misconduct is without merit. The statements within Docket Number 205 are factual and are not false. I have in no manner misled or attempted to mislead you or, more importantly, the Court.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer H. Doan", is written over a circular stamp or seal.

Jennifer H. Doan

JHD/lb

25019.00004

Enclosure