

IN THE UNITED STATES COURT FOR THE WESTERN DISTRICT OF ARKANSAS

Curtis J Neeley Jr., MFA

v.

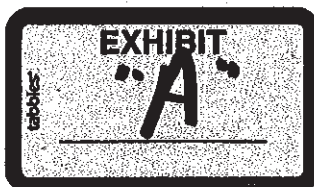
CASE NO. 5:09-cv-05151

NameMedia Inc.
Google Inc.

Rule 33 Interrogatories by Written Questions

The Plaintiff, Curtis J Neeley Jr, requests that the Defendant NAMEMEDIA INC answer the following written depositions by assigning a competent corporate officer to respond within thirty days, not including the date these questions are served. In the event the answers include private or privileged information that fact should be disclosed. Each question in this first set of interrogatories should be answered on penalty of perjury. Each answer should be answered with as much detail as possible even if it is an opinion

1. How much income did was acquired due to <eartheye.com> and <sleepspot.com> due to sale of the domain or running advertisements at the domain in AdSense for Domains or other?
2. How much income was acquired due to displaying the nude photographs of the Plaintiff and why do you feel it is acceptable to display these images to minor children and Muslims at <photo.net>?
3. What would be the effect if a domain name expiration dates were not allowed disclosed in WHOIS searches to anyone but the registrar and registrant?
4. What would be the results for your business if there was a mandatory robot exclusion protocol to identify "parked" domains resulting in exclusion by all browsers similar to the Firefox plug-in that does not allow display of domains like <eartheye.com> and <sleepspot.com> when used exclusively for ads?



- 1 5. What will be the effect of a mandatory robot exclusion protocol being required to disclose
- 2 ratings similar to commercial movie ratings for all directories when all browsers were not allowed to
- 3 display domains rated above the computer owner desires regardless of who was using the computer?
- 4 6. How much income does your company receive due to Google Inc AdSense for Domains?
- 5 7. Why display nude photographs not allowed displayed on television and what profit results?
- 6 8. What do you believe the general opinion is of nudes done as art and how would you justify
- 7 display of nudes as a result of searches for a personal name after being requested to stop this?
- 8 9. What amount of money does your company donate to politics or judges running for office?
- 9 10. What day did Ted Olson or other party claim to have received a phone call from the Plaintiff
- 10 and describe the alleged phone call in as much detail as possible?
- 11 11. Please describe Hannah Thiem's response to being notified the Plaintiff did not wish his
- 12 nudes to be displayed and describe why she did not cause the Plaintiff's nude art to be deleted and
- 13 why Robb Rosell did nearly overnight when notified in the same manner in 2010.
- 14 12. Eric Schmidt, Hannah Thiem, Ted Olson, Eric Zilinek should each now explain their interaction
- 15 with the Plaintiff.
- 16
- 17

18 Whereas these questions all involve discoverable information or are thought to lead to discoverable
19 information, Please answer each question completely and consider what your company stands to
20 lose as a result of a JURY award keeping in mind that Cisco was just ordered to pay 1.6 billion for
21 copyright violations that were not as malicious or as reprehensible as the Title 17 violations done by
22 your company.

23
24 Respectfully,

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26 Curtis J. Neeley Jr., MFA
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