

Crystal L. Cox  
Pro Se Counter Plaintiff  
Case 2:12-cv-02040-GMN-PAL  
[SavvyBroker@Yahoo.com](mailto:SavvyBroker@Yahoo.com)

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA  
Case 2:12-cv-02040-GMN-PAL

Reply to PLAINTIFFS' OPPOSITION TO  
DEFENDANT CRYSTAL COX'S  
MOTION FOR CLARIFICATION ON  
DEFENDANT'S MEDIA STATUS (ECF  
121); MOTION TO RECONSIDER  
JUDGE NAVARRO'S RECUSAL (ECF  
122); AND SECOND MOTION TO  
PROCEED IN FORMA PAUPERIS (ECF  
125)

**Regarding Opposition to DEFENDANT CRYSTAL COX'S MOTION FOR  
CLARIFICATION ON DEFENDANT'S MEDIA STATUS**

Upon knowledge and belief, Defendant Cox's Media Standing as ruled by this court is very important, as Plaintiff Marc Randazza represented Cox on this issue in Obsidian v. Cox. And Defendant Cox was reporting on Plaintiff Randazza and his law firm, expressing her first amendment right, criticizing Marc Randazza and his Law Firm, and this court simply wiped out massive online media, reporting, content, blogs without First Amendment Adjudication.

Defendant Cox Claims this to be in violation of her rights as Media and as a citizen of the United States. It is important to the public at large that this court clarify it's standing as to if this court has treated Defendant Crystal L. Cox as a media defendant or not.

Furthermore as to the legal, constitutional reason that this court has a right to simply wipe out massive online media in which criticized, reported on, reviewed, exposed **one attorney** in particular Marc J. Randazza, Plaintiff.

If Defendant Cox has mistitled this motion, then I respectfully apologize to this court and ask for guidance as to the proper motion.

Per US Code, Defendant Cox has filed motions for this court to appoint Cox an attorney and this motion has thus far not been ruled upon.

As to Plaintiff AGAIN requesting that ECF access be denied of Pro Se Litigant Crystal Cox, and the reasoning that Cox would thereby have a "barrier" and thus stop filing pertinent and important documents, this is false.

**Plaintiff Clearly knows** that a sanction of removing my ECF will not STOP me from fighting back against their lawless, unconstitutional, defamatory attacks against me, Pro Se Defendant Crystal Cox.

Plaintiff Clearly knows that **Cox vs. Randazza, et al, 2:2013cv00297**, Nevada District Court has had over 17 motions filed. All MAILED in.

Motions that are pertinent, relative and important to this issue. And Plaintiff knows that Cox does not have electronic access in that case.

Per Docket Entry 91 of this very case, District of Nevada 2:12-cv-02040-GMN-PAL, **Plaintiff Marc Randazza and Randazza Legal Group** clearly KNOW this case was filed, they have been given notice. And they taunt me over it, talk about it on blogs, yet they refuse service. Even though COX accepted emailed service on this very case.

Docket Entry 91:

"MOTION/APPLICATION for Leave to Proceed in forma pauperis (Counter Complaint Filing as separate lawsuit as Ordered by Judge Gloria M. Navarro, Docket Entry Number 89 (ECF Nos. 48 and 63), Filing In Forma Pauperis. New Case Opened under Number 13-297 District of Nevada, Plaintiff Crystal Cox, ALL Defendants Entered into Creation of New Case Number 13-297) by Counter Claimant Crystal L Cox. Motion ripe 2/24/2013. (Attachments: # 1 Civil Cover Sheet Civil Cover Sheet, # 2 Supplement Civil RICO Statement, # 3 Supplement In Forma Pauperis, # 4 Affidavit Poverty Affidavit, # 5 Supplement Tutorial Completion Certification for New Case, # 6 Supplement Electronic Filing Request for New Case, # 7 Supplement Conflict of Interest Disclosure Request for New Complaint Filing)(Cox, Crystal) (Entered: 02/24/2013)"

Plaintiff acts as if they do not know about **Cox vs. Randazza, et al, 2:2013cv00297** and refuse to participate in that case. Yet they SLAM me, Pro Se COX, in motions in this case for not serving them in that legally related case, **Cox vs. Randazza, et al, 2:2013cv00297**. And they visit my blogs often and click on links regarding documents in that case.

Plaintiff claims I refuse to work with them on discovery issues, as I will not meet them in person nor take a phone call as I, Defendant COX know that Plaintiff is Dangerous. Therefore email is the safest way, yet as the record shows Marc Randazza, Plaintiff has ORDERED all in his law firm to NOT accept any documents from me, as a Pro Se Litigant via email.

Plaintiff Marc Randazza and Randazza Legal Group know that removing my electronic access will not quench my desire for justice, equal treatment under the law nor stop me, Pro Se Litigant Crystal L. Cox in exposing their violations of laws.

**Plaintiff Marc Randazza and Randazza Legal Group know that Pro Se Litigant Crystal Cox has filed multiple cases naming them as Defendants, of which they research on Plaintiff's Blog Daily, and of which they have electronic access to.**

Cox et al v. Carr et al, 1:2013cv03257, **New York Southern District Court**

Cox et al v. Coenen et al, **Illinois Northern District Court**, 1:2013cv03633

Cox et al v. Godaddy et al, **Arizona District Court**, 2:2013cv00962

Cox v. Hill et al, 4:2013cv02046, **California Northern District Court**

Cox et al v. Coenen et al, 2:2013cv00534, **Wisconsin Eastern District Court**

Also Civil Action has been Filed, as Far as I know, in Geneva Switzerland, Republic and Canton of Geneva JUDICIAL POWER Civil Court, Court of First Instance AND Plaintiff knows of this action pending as well, upon knowledge and belief.

Plaintiff Marc Randazza, as well as Randazza Legal Group and Ronald Green, Know full well of every one of these cases, and that I don't have electronic access as of yet and still I manage to file documents.

This issue is of great importance and precedent to the public at large and I am an anti-corruption advocate for the people. I have dedicated my life to fighting judicial corruption and I, Pro Se Litigant, Investigative Blogger Crystal L. Cox will not be deterred by a removal of electronic access. Plaintiff clearly knows this.

Plaintiff Marc Randazza, as well as Randazza Legal Group and Ronald Green, also know know that Judge Gloria Navarro is named in every case, yet they continue to dispute the important need for Judge Gloria Navarro to be removed from this case.

Upon knowledge and belief, Defendant Crystal Cox alleges that this court favors Plaintiff Randazza and his law firm Randazza Legal Group, and aids and abets Plaintiff to violate the constitutional rights of Pro Se Litigant, Randazza's former client, Crystal L. Cox.

**This court issuing a ruling on whether COX has been treated as a Media Defendant or not is the request of Defendant Cox, and is of great importance to the public at large.**

Upon knowledge and belief, Crystal Cox alleges that the Nevada statutes **DO Not supercede the first amendment** nor journalistic privilege rights.

Especially when Defendant COX is NOT a Nevada Resident and this court WIPED out Cox's online media and gave to Plaintiff Randazza, along with Godaddy, without First Amendment Adjudication.

Plaintiff refers to Nevada Law, however this court did not simply remove visibility of Cox's media from Nevada residents but from the ENTIRE world, all online search engines, and without lawful reasoning or First Amendment Adjudication

**If this Nevada court, by law can do this to Defendant COX then this court can do this as a matter of precedence to any online media anywhere.**

The issue of media status is important, as if this court does not deem Cox media or a medium of communication then I suppose that would justify simply wiping out massive online content because of false and defamatory information given to this court by Plaintiff Marc J. Randazza, Randazza Legal Group.

If this District of Nevada court can delete online media, seize blogs, seize domain names from any resident in any state publishing on godaddy, google, or any other platform and without First Amendment adjudication and simply with the reasoning that Porn Attorney Marc J. Randazza said so, then this is an issue that the public at large need to be warned of.

Plaintiff Marc Randazza has threatened, **coerced**, contacted, bullied my sources in my online media such as Bankruptcy insider Stephanie DeYoung and porn industry insider Monica Foster aKa Alexandria Melody and Desi Foxx aKa Diana Grandmason, as has Plaintiff's associates Sean Tompkins, Ari Bass aKa Michael Whiteacre, and more. This was to STOP my reporting on Plaintiff and those Plaintiff is connected to.

Plaintiff Marc Randazza has threatened, **coerced**, contacted, bullied and even sued my source, insider iViewit Technology inventor Eliot Bernstein. It is ALL related to media, as I don't know these people, I was reporting on their story and Plaintiff Marc Randazza attempted to get them to aid him in attacking me, they refused and he retaliated.

**It is a MEDIA Defendant Issue.**

As media the trademark issue is MUTE, as Pro Se Defendant Crystal L. COX has to state the name of RANDAZZA to report on RANDAZZA. A trademark does NOT supercede the first amendment right to complain about, criticize, EXPOSE, report on Marc Randazza or his law firm Randazza Legal Group, as a matter of LAW.

Defendant COX has suffered MASSIVE harm on this issue and has lost all civil rights, due process and constitutional rights in regard to her online media reporting on iViewit, Randazza Legal Group, human trafficking and prostitution in the porn industry, stalking and threatening porn industry insiders and much more. IT has caused me, Defendant COX immediate and ongoing hardship in every possible way and continues to daily.

## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was filed using this Court's CM/ECF system  
**On May 18th 2013.**

Respectfully Submitted

Pro Se Defendant

Pro Se Counter Plaintiff

Crystal L. Cox

**Case 2:12-cv-02040-GMN-PAL**