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Attorney for Plaintiffs
 MARC J. RANDAZZA, JENNIFER RANDAZZA, and NATALIA RANDAZZA

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MARC J. RANDAZZA, an individual,)	Case No. 2:12-cv-02040-GMN-PAL
JENNIFER RANDAZZA, an individual, and)	
NATALIA RANDAZZA, a minor,)	PLAINTIFFS' REPLY IN SUPPORT OF
)	MOTION TO HAVE DEFENDANT
Plaintiffs,)	CRYSTAL COX DECLARED A
)	VEXATIOUS LITIGANT
vs.)	
)	
CRYSTAL COX, an individual, and ELIOT)	
BERNSTEIN, an individual,)	
)	
Defendants.)	

Plaintiffs Marc J. Randazza, Jennifer Randazza, and Natalia Randazza, through counsel, hereby submit their Reply in Support of Plaintiffs' Motion to Have Cox Declared a Vexatious Litigant.

Defendant Cox's actions and rhetoric have become increasingly threatening, and, despite the consequence of being declared a vexatious litigant, Cox has clearly stated her intention to broaden her lawsuits to include additional domestic and international actions. Cox's behavior has been and is increasingly vexatious, and Plaintiffs respectfully request this Court take steps to prevent Cox's further abuse of the Courts.

Since Plaintiffs submitted their original motion on June 3, 2013, Defendant Cox has

1 continued to file lawsuits in various jurisdictions, as evidenced by ECF 131.¹ However, Cox seems
2 dissatisfied with filing frivolous actions in different United States District Courts. Cox has stated
3 that she intends to expand her filings to various international courts, as well. Previously, Cox
4 stated that she was filing suit in Switzerland. (See ECF 128, page 2 ¶ 3). On June 4, 2013, Cox
5 implied that she planned to file suit in Toronto, as well. (See Exhibit A, Cox June 4 Blog Post). By
6 expanding this dispute to the international arena, Cox shows that these lawsuits do not serve as a
7 basis of request for relief, but rather that she is attempting to harass and intimidate Plaintiffs and
8 Plaintiffs' counsel using the court system at home and abroad. (See Exhibit A). This is not a proper
9 use of the judicial system. At least in the United States, where this Court has jurisdiction over Cox,
10 she should not have free rein to continue to use the courts solely to harass Plaintiffs.

11 Furthermore, Cox's behavior has become increasingly more menacing toward Plaintiffs,
12 third parties, and their counsel, revealing that her behavior is not a good faith use of the judicial
13 system. On May 23, 2013, Cox stated that she planned to "[Expletive] [Plaintiffs] with the
14 TRUTH. Over and Over." (See Exhibit B, Cox May 23 Blog Post). Clearly, Cox does not intend to
15 stop filing her voluminous lawsuits against Plaintiffs, Plaintiffs' counsel, judges, and dozens of
16 third parties, but instead will continue filing them "over and over" to harass them and burden more
17 U.S. District Courts throughout the country until her conduct is brought to a halt.

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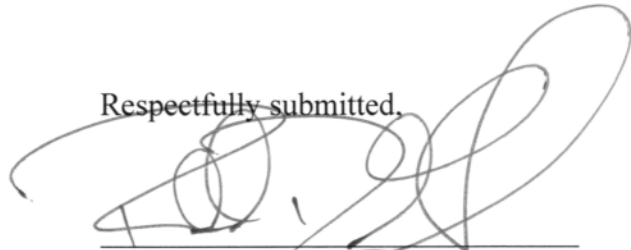
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27 ¹ The United States District Court for the Northern District of Illinois on June 7, 2013 dismissed
28 Cox's lawsuit as "legally frivolous." See Exhibit C.

1 Plaintiffs respectfully request this Court declare Cox a vexatious litigant and require her to
2 obtain an attorney's signature on any further documents filed in the instant suit, and on any other
3 action within the State of Nevada.

4
5 Dated: June 12, 2013

Respectfully submitted,

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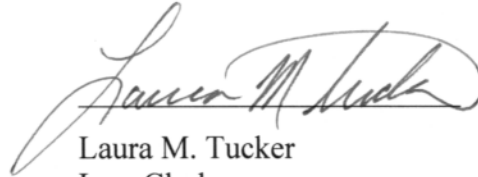
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CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure 5(b), I hereby certify that the foregoing document was filed using this Court's CM/ECF system on June 12, 2013.

Dated: June 12, 2013

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Laura M. Tucker", is written over a horizontal line.

Laura M. Tucker
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