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

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

MARC J. RANDAZZA, an individual,	)	Case No. 2:12-cv-2040
JENNIFER RANDAZZA, an individual, and	)	
NATALIA RANDAZZA, a minor,	)	<b>SECOND SUPPLEMENT TO MOTION</b>
	)	<b>TO HAVE DEFENDANT CRYSTAL</b>
Plaintiffs,	)	<b>COX DECLARED A VEXATIOUS</b>
	)	<b>LITIGANT (ECF 129)</b>
vs.	)	
	)	
CRYSTAL COX, an individual, and ELIOT	)	
BERNSTEIN, an individual,	)	
	)	
Defendants.	)	

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Plaintiffs Marc J. Randazza, Jennifer Randazza, and Natalia Randazza, a minor respectfully supplement their Motion for the Court to Declare Cox a Vexatious Litigant. Defendant Cox's duplicative lawsuits have now been dismissed in at least three other jurisdictions: the District of Arizona, the District of Eastern Pennsylvania, and the Southern District of Florida. (*See* Exhibits A, B, and C, respectively). The D. Ariz. Court declared that Cox's complaint "does not properly state a claim for relief over which the ... court ... has jurisdiction." *See* Exhibit A at 5. Both the D. Ariz. and S.D. Fla. courts stated that Cox's claims were "frivolous." *See* Exhibit A at 2; Exhibit C at 2. Furthermore, in dismissing the complaint in Florida, the S.D. Fla. reasoned that Cox's claims were "**baseless in light of the fact that the Complaint is comprised of conclusory allegations that are oft-times fantastic or delusional.**" (emphasis added) *See* Exhibit C at 2. The courts'

1 reasoning in dismissing these claims clearly supports a finding that Cox is vexatious and is filing  
2 lawsuits to harass the parties she names and not for any legitimate purpose.

3 Plaintiffs respectfully request that the Court take notice of and consider these documents  
4 when evaluating the pending motion to declare Cox a vexatious litigant, so as to put an end to her  
5 ability to continue to harass parties in the jurisdiction with further delusional and baseless claims.

6  
7 Dated: June 26, 2013

Respectfully submitted,

8  
9 /s/ Ronald D. Green

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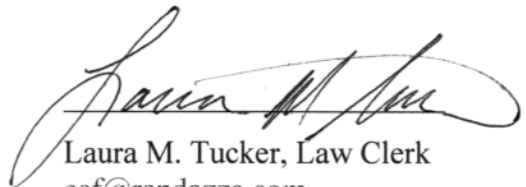
16  
17  
18 **CERTIFICATE OF SERVICE**

19 Pursuant to the Federal Rules of Civil Procedure 5(b), I hereby certify that the foregoing  
20 document was served to Defendant Crystal L. Cox at:

21 P.O. Box 2027  
22 Port Townsend, WA 98368

23 Dated: June 26, 2013

Signed,

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26  
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28 

Laura M. Tucker, Law Clerk  
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