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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-2040-JAD-PAL
JENNIFER RANDAZZA, an individual, and)	
NATALIA RANDAZZA, a minor,)	SUPPLEMENT TO PLAINTIFFS'
)	REQUEST FOR ENTRY OF DEFAULT
Plaintiffs,)	AGAINST DEFENDANT CRYSTAL
)	COX
vs.)	
)	
CRYSTAL COX, an individual, and ELIOT)	
BERNSTEIN, an individual,)	
)	
Defendants.)	

Plaintiffs Marc J. Randazza, Jennifer Randazza, and Natalia Randazza, a minor, through their attorneys, hereby supplement their Request for Entry of Default Against Defendant Crystal Cox. (ECF #157). The purpose of the instant supplement is to provide the Court with additional just discovered evidence that Defendant Crystal Cox is closely monitoring and commenting upon this case on the Internet, and has intentionally stopped participating in this litigation.

Defendant Cox has an active Facebook page about Plaintiff Marc Randazza, titled "Marc Randazza Victims Group," in which Defendant authors posts intended to bait, inflame, and harass Mr. Randazza. *See* Exhibit A, Marc Randazza Victims Group Facebook Page. Not only does Defendant Cox's activity on this page (as recent as November 19, 2013) show she has access to the

1 Internet, but a post from October 18 shows that she is monitoring the progress of the case, as well.
2 (*Id.* at 3). In the post, Cox discusses the Court's Order on Plaintiffs' Motion to Declare Defendant
3 Crystal Cox a Vexatious Litigant, stating "You CANNOT declare someone you SUE a Vixatious
4 [sic] Litigant." *Id.* Consistent with the text of the Court's Order, Defendant Cox's commentary
5 proves that she is still monitoring the lawsuit despite refusing to participate. Therefore, Defendant
6 Cox is refusing to take affirmative action, which operates as a bar to Plaintiffs' claim. *See Rashidi*
7 *v. Albright*, 818 F. Supp. 1354, 1355-56 (D. Nev. 1993).

8 Because Defendant Cox refuses to participate in this lawsuit, an entry of default is
9 appropriate under Federal Rules of Civil Procedure 55(a).

10 Dated: November 19, 2013

Respectfully submitted,

11 /s/Ronald D. Green

12 Ronald D. Green, NV Bar #7360

13 Randazza Legal Group

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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 served to Defendant Crystal L. Cox at:

P.O. Box 2027
Port Townsend, WA 98368

A copy was also sent via e-mail to Defendant Crystal Cox at crystal@crystalcox.com, savvybroker@yahoo.com, and reverendcrystalcox@gmail.com.

Dated: November 19, 2013

Signed,

/s/ Laura M. Tucker

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