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8 Attorney for Plaintiffs

9 MARC J. RANDAZZA, JENNIFER RANDAZZA, and NATALIA RANDAZZA

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12	MARC J. RANDAZZA, an individual,	)	Case No. 2:12-cv-2040-JAD-PAL
13	JENNIFER RANDAZZA, an individual, and	)	
14	NATALIA RANDAZZA, a minor,	)	<b>PLAINTIFFS' SUPPLEMENT TO</b>
15		)	<b>MOTION FOR SUMMARY JUDGMENT</b>
16	Plaintiffs,	)	<b>(ECF 75)</b>
17		)	
18	vs.	)	
19		)	
20	CRYSTAL COX, an individual, and ELIOT	)	
21	BERNSTEIN, an individual,	)	
22		)	
23	Defendants.	)	

24  
 25 Plaintiffs Marc J. Randazza, Jennifer Randazza, and Natalia Randazza a minor, through  
 26 counsel, hereby supplement their Motion for Summary Judgment (ECF 75). On July 5, 2013,  
 27 Defendant Crystal Cox was disciplined by the State of Montana Board of Realty Regulation for  
 28 similar actions to those Plaintiffs allege in the instant lawsuit. (See Exhibit A, Recommended  
 Order). The findings of the State of Montana Board of Realty Regulation in the disciplinary action  
 are consistent with the arguments Plaintiffs make in the Motion for Summary Judgment and show a  
 pattern of conduct by Ms. Cox.

In its findings of fact, the Board found that Defendant Cox created a domain name using the  
 full name of her former client, which directed to a website containing harassing and defamatory  
 content about the victim. See Exhibit A at ¶¶ 7-9. According to the Recommended Order, in

1 addition to creating the website, Cox also sent an email to the victim of the website and offered to  
2 sell him the domain name for \$550,000.00. See Exhibit A at ¶ 10. As a result, the Board  
3 sanctioned Cox with six months of probation and a \$1,000.00 fine. Exhibit A at pages 7-8.

4 The Montana order should offer persuasive analysis of many of the facts of the pending  
5 Motion for Summary Judgment. (ECF 75). The Recommended Order clearly shows Defendant  
6 Cox's pattern and history in creating websites based on her victims' names, filling the websites  
7 with false or misleading content, and then blackmailing to sell the domain names to the victims at  
8 grossly inflated prices after the damage to their reputation has been done — the same behavior  
9 Plaintiffs assert Defendant engaged in when harassing them.

10 Plaintiffs respectfully request that the Court consider this newly acquired document when  
11 evaluating the Motion for Summary Judgment.

12 Dated: December 30, 2013

Respectfully submitted,

13 /s/ Ronald D. Green

14 Ronald D. Green, NV Bar #7360

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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  
crystal@crystalcox.com; savvybroker@yahoo.com; reverendcrystalcox@gmail.com

Dated: December 30, 2013

Signed,



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