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

FILED SALVED ON COUNSEL/PARTIES OF MECONS

CLERK US DISTRICT COURT DISTRICT OF NEVADA

DEPUTY

MARC J. RANDAZZA, Plaintiff

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Crystal L. Cox Pro Se Defendant

Objection to Motion to Strike

Defendant Cox / Counter Plaintiff Objects to Motion to Strike.

Randazza sued Cox and seized domain names related to the name Randazza Legal Group, yet claims that RLG is not a Plaintiff, how can this be when they are so

Cox claims that Plaintiff Marc J. Randazza and Randazza legal group are so inextricably intertwined in this legal case alleging trademark and copyright infringement that Cox has every right to counter sue RLG and Marc J. Randazza one in the same professionally and personally.

Randazza alleges that Cox gained from his business name and that Cox commercially profited, this was in regard to RLG also and not just Marc J. Randazza. Adding his wife and child to this case is immoral at best and Cox will not counter sue nor allege any legal action against them whatsoever. Though Cox could and Ms. Randazza would also be liable as she is also a Plaintiff in this frivolous SLAPP suit against Cox.

Cox alleges that she has a right to Sue Marc Randazza and Randazza legal group and to be awarded damages, punitive, actual damages, duress and more due to all that Marc Randazza and his law firm have done to Cox.

Throughout this case Cox has moved the court to rule that Randazza had to disclose his insurance carrier for him as a lawyer and his law firm and has been denied. Randazza and his law firm have violated Cox's rights, got private information from Cox, bullied all people they



could into giving them private, personal information on Cox and those she knows, has every known or has had a spiritual counseling relationship in her ministry.

If this court rules that it is acceptable, lawful, and following Rules of Procedure for Marc Randazza acting as his own attorney, a litigant in this case, to have obtained the home address, private emails, banking information, wire transfers, all phone records and number Cox has ever called, all on her phone account, phone numbers of those she counsels under Pastoral Privilege and has a confidentiality agreement with, all Cox's ministry trips, rental cars, communications with Cox's church under confidence, information on travel and plane tickets and the credit card name and numbers who paid them and more private, personal, fiduciary information of Counter Plaintiff / Defendant Crystal Cox;

Then Cox moves this court to grant her equality in this matter and allow or RULE that Cox have all of these same privileges regarding all Randazza's phone calls, bank accounts, private information, phone numbers of those he has a confidentiality agreement with, his private emails, his information from his church in any way, his phone records and who is on all accounts, any wire transfers, information on travel and plane tickets and the credit card name and numbers who paid them. And maybe even those of his wife as she is a litigant in this case as well and they should not have been able to do this to me and me not be able to have those same rights.

Cox especially wants access to Randazza's bank account to prove what she has recently read on Twitter, see Exhibit 3 where TRWPL (Sean Tompkins, Stalker) and Ari Bass aKa Michael Whiteacres allege that MR (Marc Randazza) and his law firm pay them each, \$7500 a month to stalk and harass people he is in litigations with or wants to silence.

In Cox's motion to sanction you see an email to Cox claiming that Devoy and Green are also bullying people into giving private and false information in order to set Cox up and gather private, privileged, sacred, financial, and private communications information. Cox asks this court to move on the question of is this lawful, or within the rules of procedure?

Cox had given up on a counter claim, DENIED a year Ago. Cox was ruled to have a counter claim allowed, so why make Cox go through all this to have Randazza strike it again.

Yes, it may not be the right cause of action, written well or correct within law and rules of procedure but Cox does not know how to best present her counterclaims and requests an attorney. I have done the best I can to present a short, brief respectful to the court counterclaim.

If Cox's Entire Counterclaim Is Improper then Cox requests counsel to assist her to rewrite this counterclaim in a "proper way" as Cox clearly has had her legal rights, civil rights, human rights, privacy rights violated by the Plaintiff Marc Randazza and his law firm Randazza Legal

Group as well as J. Malcom DeVoy, attorney for stalker Sean Tomkins and Ronald Green of RLG allegedly representing Randazza who actually is acting as his own attorney and writing motions, intimidating witnesses, trying to subpoena and more as his own attorney.

Defendant Cox is an investigative blogger who has dedicated her life to givnig voice to victims of corruption and her spiritual mission to empower others, and make the world a better place for us all. Cox is not a "resourceful slanderer."

Randazza sued Cox, and instead of serving her, he used his media connections and legal bloggers to report on the lawsuit and defame and slander his former client Cox. Cox read one of this and contacted the court to serve herself and attempt to defend herself and make a stand for all in porn, human trafficking victims, pedophile victims who are beaten down and suppressed by Marc Randazza and those connected to him.

Randazza claims, "Cox attempts to use the Court to advance her own improper ends, doing so with the mistaken belief that all documents filed in a Court proceeding are absolutely privileged and thus cannot be the basis of liability. Unfortunately, the result is that Cox believes she can misuse the Court's file as her own personal extortion tool."

Yet, Clearly, Cox is only defending herself against attacks and lawsuits of others. Cox was sued by powerful lawyers, huge and powerful law firms in multiple states and is and has been fighting back and certainly was not the instigator in these litigations in a court of law.

I, Cox, admittedly, do not understand most of the gibberish that RGL has put in this motion, it's either over my head or complete nonesense.

Randazza says, "If Cox believes these claims have merit, she has no obstacle preventing her from serving any of the defendants in those actions. If she has chosen to abandon these claims in the other pending actions, this court should feel no twinge of conscience at denying her a fourth opportunity to file a proper counterclaim"

Cox has no way to serve defendants, Randazza knows these legal actions exist but refused service via email in every case as I have accepted in this case.

Cox does not know how to serve all she has legitimately named in legal actions, though Cox has valid, true and proper claims. Cox moves this court for help in serving those people as she has done in past motions.

Cox does not choose to abandon any claims she has ever made. Cox's claims were dismissed by the courts as far as she knows.

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## **Certification of Service**

On March, 15 2014, Counter Plaintiff Crystal Cox certifies mailing a copy of this to:

U.S. District Court Clerk of Court Room 1334 333 Las Vegas Blvd. S. Las Vegas, NV 89101

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