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

MARC J. RANDAZZA,
Plaintiff

v.

Crystal L. Cox
Pro Se Defendant

Motion to Relate Case; District Court State of Nevada,
County of Clark Eighth Judicial District A-14-69 8267- C

Defendant Crystal Cox moves this court to legally relate **District Court State of Nevada, County of Clark Eighth Judicial District A-14-69 8267- C**, to this case as the case is almost exactly similar, only Marc Randazza is representing the opposite side of the argument.

It is important as Randazza is presenting the exact opposite defense as in this case against me, and this court should make note of this situation.

Marc Randazza has engaged in a campaign to "scrub" consumer review sites against him. I, Crystal Cox was harmed by Marc Randazza, he acted as my attorney. I have every right to review him, yet he removed massive online sites of mine, sued me for millions, sued one of my sources of corruption, and has engaged in massive harassment and legal actions in multiple courts to scrub the internet of sites reviewing him, yet files this motion / complaint above in exact opposite of his own hypocritical actions.

Marc Randazza has violated the rights of Blogger Crystal Cox and yet presents the opposite case in District Court State of Nevada, County of Clark Eighth Judicial District A-14-69 8267- C.

"Last spring, Nevada Corporate Headquarters did the exact, wrong thing in response to the reviews on Ripoff Report: filed a lawsuit against the company. It lost. The court found, rightly, that Ripoff Report was protected by Section 230 of the CDA, and dismissed the initial lawsuit with prejudice. You would think that Nevada Corporate Headquarters and its lawyers might take the time to understand Section 230 and the nature of the internet. They, apparently, did



not. Instead, a few months later, they filed a nearly identical lawsuit, in small claims court, against Opinion Corporation. Back in January, the court similarly dismissed that lawsuit, again pointing to Section 230 of the CDA which grants immunity to service providers from the content their users post. Opinion Corporation sought legal fees in response to this, but was denied, since legal fees are not recoverable in small claims court. "

"Now, in an interesting move, Opinion Corporation, represented by Marc Randazza, has filed an anti-SLAPP lawsuit in a Nevada state court, under Nevada's Anti-SLAPP law, which does give attorney's fees to those who have been slapped down by bogus lawsuits trying to silence public discussion. It's an interesting legal move, as Opinion Corp. is basically arguing that since it was clearly SLAPP'd, even though via a small claims court, it can now file for attorneys' fees in state court under the state's anti-SLAPP law. The company argues, somewhat convincingly, that without this, Nevada Corporate Headquarters would be free to continue SLAPPING other sites in small claims court, knowing that there's no real downside to doing so. Furthermore, the fact that NVCHQ had already lost its case against Ripoff Report demonstrates that it clearly knew the SLAPP suit was nothing but a SLAPP in the first place, making the action even more egregious.

Defendant deliberately brought an action against Plaintiff it knew to be groundless and in violation of N.R.S. 41.660, as evidenced by the dismissal of its earlier identical action against Ripoff Report.

Even if the Defendant had not received virtually identical orders in the past, any reasonable party would know, or should have known, that Opinion Corp. was immune from liability.

The Defendant implicitly acknowledged that the claims were legally baseless by submitting an opposition to the motion that was devoid of even a single citation to any authority."

Justice Court, Clark County Nevada 13A001271, Exhibit 9 page 45,

"This court lacks jurisdiction to hear this matter because the defendant has insufficient contracts with Nevada. Based on Federal Law the Defendant has immunity from the Claims." "For this reasons the defendants motion to dismiss is granted"

Defendant Crystal Cox moves this court to dismiss Randazza's claims against Cox for this very reason. Marc clearly filed a SLAPP suite against me, Crystal Cox then after this gets a stronger SLAPP law for Nevada. He is a hypocrite and he sued Cox simply to shut her up, bully her, intimidate her and this court should award Cox a summary judgment for 10 million, as Cox has clearly been violated by Randazza and he knows that he violated the law and my rights. As he provides the opposite case.

On March 8th, 2014 Marc Randazza emails Crystal Cox and tells her that he has made Crystal Cox's church, via the Church secretary give him information on all of Cox's phone

calls, financial records, trips made for the church, phone numbers of those she has privileged clergy with, her home address, and more personal information. Randazza then used this information to attempt to threaten Crystal Cox into a settlement in Randazza v. Cox of which he sued Cox for approx.3 million dollars and Cox has no money what so ever, and of which he stole the domain names 1.6 years ago.

On March 20th, 2014, Randazza Legal Group, Marc Randazza filed an objection to a motion filed by Defendant Crystal Cox in that case, "Motion to Sanction" Marc Randazza for his illegal, unconstitutional and unethical actions. This is Docket Entry 188, Page 8, where Randazza Legal Group speaks of this Florida case, saying:

"H. Randazza's Separate Florida Action Has No Bearing on This Case. Cox extensively quotes an article from Law360 on pages 9 and 10 of her motion (ECF 184 at 9-10), discussing a separate action Randazza filed against GoDaddy.com LLC in Florida.

Randazza's Florida action was not filed by counsel in this case, is pending in state court, seeking discovery on state law claims, and seeks equitable relief that is entirely unique to Florida law. In addition to being beyond the Court's jurisdictional purview, it is procedurally proper, and not a basis for the Court to entertain sanctions. "

Marc Randazza claims this legal action in this court is connected to extortion, however the truth is Randazza is harassing Crystal Cox and seeking private information from whistleblowers.

Law360 article regarding Randazza's intent:

"Law360, Miami (March 05, 2014, 9:44 PM ET) -- A First Amendment attorney has sued three Web domain-hosting companies, including GoDaddy LLC, in Florida state court Wednesday for a bill of pure discovery, **so he could bring extortion claims** against a group of individuals allegedly behind a collection of defamatory websites.

Marc Randazza, whose firm has offices in Las Vegas and Nevada, says that a group led by Crystal L. Cox, a blogger at the center of a notable recent defamation case, has conspired to extort money from him by buying website domain names related.."

Marc Randazza is abusing his power as a Florida attorney to attempt to set up and entrap Crystal Cox and others and outside of the criminal justice system where this matter should be.

On March 26th, 2014, Crystal Cox and countless others receive this email from Godaddy.

"This email is to inform you that we have received a properly formatted Amended Complaint in Equity for a Bill of Pure Discovery for documents in the following civil action: *Marc J. Randazza et al. v GoDaddy, LLC et al.* issued by the Miami-Dade County, Florida 11th Judicial Circuit Court, Civil Action No. 2014-5636-CA. Our response to this subpoena may require us to disclose some of **your personally identifiable information**. Therefore, we are providing this notice as a courtesy to give you an opportunity to object to the Amended Complaint. The only way to object to a properly filed Amended Complaint is by filing an objection with the court in which the matter is pending. If you intend on filing an objection, please let us know within 3 business days. If we do not receive an objection notice indicating that you have filed or will be filing an objection, we will continue with producing the documents requested and may charge your account according to our registration agreement. Should you require additional time within which to file your objection with the court, please let us know.

In order to obtain further information related to the pending litigation or a copy of the subpoena, you may contact counsel for the requesting party as follows:

Marc J. Randazza
Randazza Legal Group
2 South Biscayne Blvd., Suite 2600
Miami, FL 33131
888.667.1113 Telephone"

I, Pro Se Crystal Cox Object to Marc Randazza using a Florida state court, this court to sue an arizona company for private information on a Washington resident, me.

I, Pro Se Crystal Cox move this court to enjoin the attorney general in this matter.

I, Pro Se Crystal Cox move this court to contact the FBI and department of justice as to the illegal and unconstitutional behavior of Marc J. Randazza, Randazza Legal Group.

Marc Randazza, has abused his power and privilege as a Florida attorney living in Las Vegas to take advantage of a unique Florida Law to sue Godaddy in Arizona and violate the rights of an investigative journalist, Crystal L. Cox exposing his illegal activity with the porn industry. And to get private, confidential information on her sources.

Note:

Randazza lied about my life, my income, my extorting him, and pretty much everything on this docket, yet he seems to have some super power to flat out lie under oath and get away with it.

This court will not appoint me an attorney though my civil rights are clearly violated. I am told that my motions ramble and am slammed for how I write them, then the court says I am articulate and doing just fine, and no need for an attorney.

Respectfully, with Knowledge and belief, I allege It is flat out false that I can afford an attorney, and false that I have no legal rights to an attorney under law or very extreme circumstances. Randazza lies under penalty and perjury and seems to be protected by this court to do so.

This court implies that I babble, create chaotic motions, repeat and slams me for how I word things in motions, then turns around and says I am articulate and doing fine at self representation.

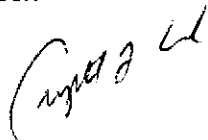
I want to depose Randazza, I have no idea how to accomplish that. I have no idea how to proceed in discovery or trial update whatevers, I have never done that. I cannot attend hearings and have no way to effectively defend myself, however I am repeatedly denied an attorney and my legal rights in this court.

I do not know how to proceed to trial, and if I am sanctioned for this, I ask what will the sanction be. I am under constant, worldwide HATE due to Randazza, I have a PI or someone who watches me for Randazza, I have constant threats, my days are filled with stress, fear and worry, I have no way to rent a home, lost my family and everything I knew to be my life, and have no hope in sight of Marc Randazza facing Justice. SO what sanction could there be, Death, I would even welcome that relief at this point. Money sanctions? I have no money. Jail? well at least he may not kill me there, I could eat and maybe have a printer for free to file motions that this court demands I keep filing though I have no clue how to do so effectively and seem to constantly incriminate myself.

Judge Leen and Judge Navarro are believed to have conflicts of interest in all matters relating to me, I have asked for Conflict of Interest disclosures to be signed and have been denied. I am not treated fairly by either Judge. Judge Dorsey seems to truly be impartial, however, I cannot be sure as there is so much corruption surrounding all of this.

I have no idea how to proceed in this case and have too much fear to communicate directly with Randazza or be in the same room with any of them. I again move this court to make them get outside counsel and take the life and death, quality of life, civil rights, human rights and criminal aspects of this case seriously, on all sides.

Reverend Crystal Cox
Pro Se Defendant



April 1st 92

Certification of Service

On ~~March 24~~, 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

Crystal Cox

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