

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

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APR - 8 2015

CLERK US DISTRICT COURT
DISTRICT OF NEVADA

BY: _____ DEPUTY

CRYSTAL L. COX,
Defendant, Counter Plaintiff

v.

MARC J. RANDAZZA,
Plaintiffs, Counter Defendant

Motion in Limine
to Include Exhibit 21

Cox moves this court to include Exhibit 21, an email between Cox and her Former attorney Marc Randazza, Counter Defendant.

Exhibit 21 shows that Marc respect Cox, apologized if I felt not treated well and said that "People like you are important for the future of citizen journalism, and I wish to see you succeed."

It shows he lied about representation. and admits to trying to broker a deal on Cox's behalf, which is the very definition of "representation. Exhibit 21 shows Randazza saying, "I did tell the opposing counsel that I thought a deal might be brokered".

Exhibit 21 shows Randazza saying, "Despite the contents of this email, I wish to let you know that I am sill willing to lend a hand in any way - even in the background."

Cox took her former client, who claimed to humbly respect her, apologize, say people like her were need, at his word. Cox truly believed that Randazza was sincere in letting him know if he could help, even in the background. Cox had lost her home to foreclosure, lost her income and needed a job, this was the help she needed. She simply asked Randazza if he knew anyone or would hire Cox for PR work and yet he maliciously, deliberately and knowing the truth painted to the world that Cox had extorted him. Knowing full well that he did not believe this, he simply want to teach Cox a lesson, intimidate her and ruin her life.

In which he succeeded. He convinced the world Cox was a criminal who had attacked

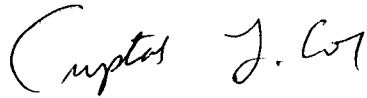
his infant daughter. This ruined Cox's family relationships, business, friendships, ability to rent a home and has left Cox desolate, homeless and unable to rent, to work or to secure clients.

As all exhibits show, Marc Randazza was acting as my attorney. He worked with others in this representation such as Eugene Volokh and the opposition David Aman.

Cox would have kept Randazza on with Volokh had he not lied to her, berated her, presented deals to the opposition without her permission or knowledge of what they were, in her, then, 2.5 million dollar judgment.

Randazza retaliated against his former client, and Exhibit 21 proves that he did so with intent, maliciously and after claiming, offering to be of any kind of help.

Cox moves this court to include Exhibit 21 as evidence against Marc Randazza in her counterclaim.

A handwritten signature in black ink, appearing to read "Crystal L. Cox".

Crystal L. Cox, Pro Se
Counter Plaintiff / Defendant

Certification of Service

On April 6, 2015, 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

A handwritten signature in black ink, appearing to read "Crystal L. Cox".

YAHOO! MAIL

Subject RE: from Pre Se Defendant Crystal L. Cox
From mjr@randazza.com <mjr@randazza.com>
To Crystal L. Cox <savvybroker@yahoo.com>
Date Fri, Dec 16, 2011 at 12:55 PM

Crystal,

I want to address a few things:

First and foremost, if you feel that I did not treat you respectfully, I humbly apologize. I do not wish to leave that un-discussed. People like you are important for the future of citizen journalism, and I wish to see you succeed.

I also want to correct a misperception here. I did not tell anyone that I represented you, for certain. I did tell the opposing counsel that I thought a deal might be brokered - but that I wanted to speak to him first (to test his waters with respect to a possible mutually agreeable resolution).

Finally, I want to make it clear that our discussion about money was in terms of "costs." I thought that I made it clear that my bills, my fees (my income) would be waived. All that I was asking you about being able to pay was out of pocket reimbursement of expenses.

Despite the contents of this email, I wish to let you know that I am still willing to lend a hand in any way - even in the background.

-Marc

—— Original Message ——

Subject: from Pre Se Defendant Crystal L. Cox
From: "Crystal L. Cox" <savvybroker@yahoo.com>
Date: Fri, December 16, 2011 9:21 am
To: VOLOKH@law.ucla.edu, mjr@randazza.com <mjr@randazza.com>

Marc and Eugene,

I hope this email finds you doing well. I just want to clarify a few things as respectfully as I can.

Marc, it was nice talking with you, I do feel your working in the best interest of bloggers. After our conversation I sent documents, not even all, as you needed them another way, I never heard different and I prayed about our connection and its of the "greater good" and well Marc, when on the phone with me you told me I messed this up, thing is I am divinely led, and I did a great job, and in losing I got voice to the victims I fight for. I DID NOT MESS UP.

I filed tons of document, not the way you would of but they are in the public record, and also this trial, to me as it stands will be used to assist me in filing a Federal RICO Lawsuit and a Whistleblower Lawsuit, as I got them to perjury themselves. And my goal is justice

EXHIBIT 21

for all, and though an attorney may have got me out of this early, thing is there would have been someone else to sue me, or another to get sued to bring about the change in bloggers rights that this will bring. I did NOT mess up, and its important to me to be respected as the strong, intelligent, woman that I am, as my intention is really of the light, is good and ya sometimes I seem over the top but I am all heart on this, and my victims I will fight to the death for.

That's just who and what I am. You, Marc do not seem to respect me, or treat me as if I am worthy, equal to you, and it feels like you want your client, or possibly women in general to take a back seat to you and that's not me. And to confirm all this for me as I prayed for a sign, I heard thru several channels that you were saying you represented me, but did not give me the decency or respect to tell me or even keep me in the loop.

To not even email me back that you read any of the documents, to not contact me and then I hear your representing me. You said you may have a conflict and would let me know, you did not let me know and then seemed to tell others your were representing me, and you wanted money I don't have. To me, after working 7 years at this, facing judges set me up, cops set me up, attorneys screw me over, death threats, being drugged, and extreme duress and persecution over all this for so long, well, you telling others you represent me BEFORE telling me, well that is on the wrong side of the moral and ethical compass to me. And is opposite of the equal rights, women's rights, lesbian rights, bloggers rights, citizen journalists rights, victims rights that I fight for.

Marc I got your forward last night, thing is I know the exact dollar amount of the transcripts, have known for over a week, and i know the court clerk email, been in this a year now. So that proves again you think me clueless, i have no money to get the transcripts at this time.

Eugene spoke highly of you and even recommended you, thing is I will not speak with anyone on this from the law aspect expect Eugene, if he can't represent me, I will not appeal. As Eugene represents what I fight for, and no disrespect marc just a tip for your future, Eugene emailed me here and there and let me know what was going on, he listened to me, respected me and never once told me I messed up or EVER assumed anything about me. Nor did he speak of my journalistic standards as an issue, as you did. He never hesitated in wanted to represent me, it was simply a matter of if he could. He is Kind to me, smart and treats me with dignity and respect, you do not. Sorry that Simple.

So Just wanted you to know a bit why, and confirm, Marc Randazza does NOT represent me in ANY way. Eugene Volokh represents me, and if he can't then so be it, I will leave that in the hands of the Great Spirit. I will not lose my voice, my dignity, and respect in this. I know my Truth though many others are trashing me, I know my truth.

The New York Times and Forbes are legally defaming me and inspiring a lynch mob

based on one email that they refuse to discuss my side or even investigate the truth. I want to file lawsuits against them, and I intend to fight back.

I do not want to sit down and shut up, I do not want a back seat in this, though I dont want to interfere or tell an attorney whats best, thing is I know the clerks, the case, the documents and I just want respect for what I have done and not told I messed up.

I have lost my home phone, and internet, I am to be evicted on Monday, I keep fighting and blogging and I will no matter what. This last year I lost everything that was dear to me, and my life as I knew it, corruption has done everything to shut me down. So no disrespect Marc, I just don't like the way you treated me.

take care and keep up the great work for the better good of all victims of a corrupt justices system that makes victims out to be criminals. The Lie will NOT stand as the TRUTH on my watch. I am certain of my Fight, my Mission per say.

Blessings to You

In Love and Light,

Crystal L. Cox
Broker Owner



Search Engine Reputation Manager
Investigative Blogger
Good Life International Distributor

Peace and Love to You !!!