

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

CRYSTAL L. COX,  
Defendant, Counter Plaintiff

v.

MARC J. RANDAZZA,  
Plaintiffs, Counter Defendant

FILED ☒ RECEIVED  
ENTERED ☐ SERVED ON  
COUNSEL/PARTIES OF RECORD

APR - 8 2015

CLERK US DISTRICT COURT  
DISTRICT OF NEVADA

BY: \_\_\_\_\_ DEPUTY

Motion in Limine  
to Include Exhibit 20

Counter Plaintiff Cox moves this court to accept exhibit 20 into evidence. Exhibit 20 is email correspondence between me, Eugene Volokh and Marc Randazza regarding case strategy, moving forward, transcripts and negotiations.

Volokh clearly thought Randazza represented Cox and, having Cox's permission moved forward in the case of the Obsidian Finance appeal.

Exhibit 20 proves Randazza was my attorney and acting as my, Cox's attorney. Therefore Randazza is guilty of malpractice and defamation in his wide spread campaign to violate his clients rights, retaliate when she removed him from the case, and deliberately lie about her in widespread media knowing fully that his statements were false and defamatory.

Crystal L. Cox, Pro Se  
Counter Plaintiff



**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

# YAHOO! MAIL

**Subject** [FWD: Trial transcripts]  
**From** mjr@randazza.com <mjr@randazza.com>  
**To** Crystal Cox <savvybroker@yahoo.com>  
**Date** Thu, Dec 15, 2011 at 5:50 PM

Crystal,

See below. You should do this if you want to move forward.

—— Original Message ——

Subject: Trial transcripts  
From: "Volokh, Eugene" <[VOLOKH@law.ucla.edu](mailto:VOLOKH@law.ucla.edu)>  
Date: Thu, December 15, 2011 12:34 pm  
To: "Marc Randazza ([mjr@randazza.com](mailto:mjr@randazza.com))" <[mjr@randazza.com](mailto:mjr@randazza.com)>

By the way, I forgot to say: If you think we should indeed file a motion for a new trial, we'll probably need transcripts of the trial and of the Nov. 28 hearing (docket #89) that's referenced in the Nov. 30 opinion. I talked yesterday to the court reporter to ask her about her timetable and cost for this, and she said that for a 1-week turnaround, the cost is a bit under \$5/page, the Nov. 28 hearing is about 30 pages, and the trial is about 200 pages, though she could omit the voir dire, which would save 30-40 pages.

Given the turnaround, the coming Christmas holidays, and the early January due date for the motion for a new trial (Jan. 5, I think), it would probably be best to ask for the transcripts today – if you think having the transcripts would be useful to preparing the motion for a new trial – since any delay will mean we won't get them until Dec. 27 or so (given the Christmas days off). You can reach the court reporter at [nancy\\_walker@ord.uscourts.gov](mailto:nancy_walker@ord.uscourts.gov). All the best,

Eugene

Exhibit 20