

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

<input checked="checked" type="checkbox"/> FILED	<input type="checkbox"/> RECEIVED
<input type="checkbox"/> ENTERED	<input type="checkbox"/> SERVED ON
COUNSEL/PARTIES OF RECORD	
APR - 8 2015	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY

Motion in Limine

Counter Plaintiff Crystal Cox submits this motion in limine to include Exhibit 1 attached to this motion.

This exhibit is an email to Crystal Cox from UCLA Law Professor Eugene Volokh. Volokh told Cox that he had spoke with Randazza, and that Randazza said he was, in fact, representing Crystal Cox in her Obsidian appeal. Randazza had no authority to state this nor to act on Cox's behalf, nor had he notified Cox that he represented her. He simply told Volokh and other attorneys that he represented Cox.

In a phone call with Volokh, he told me, Crystal Cox that Randazza was negotiating with the opposition and had put in time and material in representing me.

I request the attached exhibit be allowed as evidence in the trial regarding Cox's counter complaint as proof of Malpractice.

Crystal L. Cox, Pro Se
Counter Plaintiff / Defendant

Certification of Service

On April 1 , 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

Subject: RE: Quick question

From: Volokh, Eugene (VOLOKH@law.ucla.edu)

To: savvybroker@yahoo.com;

Date: Thursday, December 15, 2011 2:37 PM

Dear Ms. Cox: I had a long and, I hope, helpful conversation about the case with Mr. Randazza this morning, and my sense was that he thought he was indeed representing you. I'd like to make sure that you and he are on the same page about this, especially since it sounds like he's already investing a good deal of time and effort in the case. So please do talk to him about this, just to confirm that everything is set.

If he is your lawyer (and, as I said, it would be good for you if he were), I might well be able to participate in the case together with him, though I still haven't heard for sure from Mayer Brown LLP whether I can indeed do that. But I won't be able to help if it turns out that there are miscommunications between you and him about whether he is indeed representing you.

Eugene Volokh

From: savvybroker@yahoo.com [mailto:savvybroker@yahoo.com]

Sent: Thursday, December 15, 2011 2:01 PM

To: Volokh, Eugene

Subject: Re: Quick question

please proceed i have NOT committed to marc. what channel did u hear

Connected by DROID on Verizon Wireless

Exhibit 1

-----Original message-----

From: "Volokh, Eugene" <VOLOKH@law.ucla.edu>
To: "Crystal L. Cox" <savvybroker@yahoo.com>
Sent: Thu, Dec 15, 2011 01:00:04 GMT+00:00
Subject: Quick question

Dear Ms. Cox: I've heard through other channels that Marc Randazza will be handling your case. If that's so, good for you – he's an experienced lawyer, and you need someone who can get on this right away. Just let me know ASAP, please, whether that's so, so that I can call off the internal pro bono approval process here at the Mayer Brown LLP firm. Many thanks,

Eugene Volokh

Exhibit 1

Subject: Quick question

From: Volokh, Eugene (VOLOKH@law.uda.edu)

To: sawybroker@yahoo.com;

Date: Wednesday, December 14, 2011 5:00 PM

Dear Ms. Cox: I've heard through other channels that Marc Randazza will be handling your case. If that's so, good for you — he's an experienced lawyer, and you need someone who can get on this right away. Just let me know ASAP, please, whether that's so, so that I can call off the internal pro bono approval process here at the Mayer Brown LLP firm. Many thanks,

Eugene Volokh

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Exh. b.1