

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

FILED	RECEIVED
ENTERED	SERVED ON
COUNSEL/PARTIES OF RECORD	
APR - 8 2015	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY

CRYSTAL L. COX,
Defendant, Counter Plaintiff

v.) PreTrial Order

MARC J. RANDAZZA,
Plaintiff, Counter Defendant

Having conferred among themselves and with the Court pursuant to Rule 16 of the Federal Rules of Civil Procedure, the parties adopt the following statements, directions and agreements as the Joint Pretrial Order: (Cox is unable to confer with Opposition)

I. Trial Counsel

Trial counsel for Plaintiff Marc Randazza is Teresa Haar and Ronald Green of Randazza Legal Group.

Trial counsel for Counterdefendant Marc Randazza is F. Christopher Austin of Weide & Miller, Ltd.

Trial counsel for Defendant and for CounterPlaintiff is Crystal L. Cox, Pro Se.

II. Subject Matter Jurisdiction

This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1343 and 42 U.S.C. § 1983. The subject matter of the Court is not contested in Counterclaim.

The Jurisdiction is contested in Randazza v. Cox. As Defendant Cox claims and has claimed that Nevada is not the proper jurisdiction.

III. Claims And Defenses To Be Tried

Randazza v. Cox

Cx

- (1) Whether Defendant Cox violated Trademark Law with her Gripe Sites
- (2)

Cox v. Randazza (counterclaim)

- (1) Whether Marc Randazza Defamed Crystal Cox, Counter Plaintiff
- (2) Whether Marc Randazza Defamed Cox deliberately, maliciously, and with willful wanton intent.
- (3) Whether Counterdefendant Marc Randazza represented Crystal Cox as her attorney.
- (4) Whether Counterdefendant Marc Randazza used a private email between him and his former client Cox to defame her, ruin her life and business. And did so with willful wanton intent.
- (5) Whether Counterdefendant Marc Randazza is guilty of malpractice.
- (6) Whether Counterdefendant Marc Randazza knowingly lied to Forbes, NPR, WIPO, and several financial and legal bloggers regarding Cox, with deliberate and willful intent to defame her, harass her, intimidate her and retaliate against her.
- (7) Whether Counterdefendant Marc Randazza is guilty of Defamation and Slander.
- (8) Whether Counterdefendant Marc Randazza is liable for the damage he has caused to Counterdefendant Cox.
- (9) Whether Randazza misrepresented himself as Cox's attorney and having a right to negotiate in her Obsidian Appeal case or not.
- (10) Whether Randazza baited Cox by emailing her and saying to let him know if he can help in any way and then when she did he used that email to deliberately, willfully, and with full knowledge of the law as a defamation expert, defame Crystal Cox.
- (11) Whether Cox is entitled to financial relief for her years of suffering and the permanent damage to her career and reputation.

IV. Jury Trial

Counter Plaintiff has demanded a jury trial of all issues and CounterDefendant accepted this demand for a jury trial. Parties now wish to have a Non-Jury Trial on all issues. The parties have not consented to trial of the case by a magistrate judge.

V. Stipulations

Plaintiff and Defendants have entered into the following stipulations of fact:

1. **Per Order Document 200, Cox is NOT in Violation of Trademark Law, nor are any other claims by Plaintiff Valid as per the case law in the Judicial Ruling**
- 2.
- 3.
- 4.
- 5.

CounterPlaintiff and CounterDefendants have entered into the following stipulations of fact:

1. **Marc Randazza told attorney Eugene Volokh that he would bow out of the Crystal Cox appeal if Eugene were to want to represent Cox.**
2. **Marc Randazza has posted blog posts that accuse Cox of Criminal activity of which she has not been adjudicated for nor under investigation for.**
3. **Marc Randazza told Forbes, NPR, and other high profile law firm bloggers and reporters that Cox had a blog about his 3 year old daughter, which he knew was not true and deliberately defamed Cox with willful wanton intent.**
4. **Marc Randazza attempted to negotiate a deal with the opposition in her First Amendment Case on her behalf, and without her knowledge of the details of the negotiation.**
5. **Marc Randazza told Forbes, NPR, and other high profile law firm bloggers and reporters that Cox had extorted him, knowing full well he told Cox he would help her in any way he could, and that people like her were important. Knowing that the email was not extortion but a**

Cox

simple request.

6. Marc Randazza used a private email sent to him directly as Cox's former attorney and broadcast it on legal blogs and in widespread media to paint Cox in false light with deliberate and willful intent and full knowledge of the law.

7. Marc Randazza engaged in a campaign to ruin Cox's reputation, her business and her family and business relationships.

8. Marc Randazza told attorney Eugene Volokh that he represented Crystal Cox and had put time and material into this representation.

9. Marc Randazza told other First Amendment attorneys that he represented Cox and therefore interfered with Cox getting representation and attempted to interfere with the Ninth Circuit appeal of her high profile and very important First Amendment Case, in retaliation for her choosing another attorney.

10. Marc Randazza disclosed Cox's strategy, weaknesses and intent to the opposition in regard to Obsidian Finance appeal without Cox's permission, and after a confidential phone conference with Cox.

11. Marc Randazza held himself to others that he represented Crystal Cox as her attorney.

12. Marc Randazza claimed to be Cox's attorney and negotiated allegedly on behalf of Cox without her permission, consent or knowledge.

13. Marc Randazza is guilty of Defamation

14. Marc Randazza is guilty of Malpractice

VI. Witnesses

A. A list of Plaintiffs witnesses is unknown.

B. A list of Defendants witnesses

Eugene Volokh

Plaintiff Prospective Witness List

- 1.
- 2.
- 3.

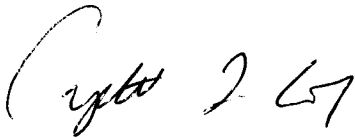
CounterPlaintiff Prospective Witness List

1. Eugene Volokh
2. Kashmir Hill
3. Scott Greenfield
4. Jordan Rushie
5. Tracy Coenan
6. Bob Garfield
7. Alexandra Mayers
8. Diana Grandmason
9. Kenneth White
10. Ronald Green
11. Tracy Coenen

VII Exhibits

- A. A list of Plaintiffs Exhibits
- B. A list of Defendant / Counter Plaintiffs Exhibits

Counter Plaintiff's Exhibits will be added in several Motions in Limine



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

A handwritten signature in black ink, appearing to read "Crystal Cox", is written over the address text.A small, stylized handwritten mark or signature in the bottom right corner of the page.

