

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

CRYSTAL L. COX,
Defendant, Counter Plaintiff
Defendant Eliot Bernstein

v.

MARC J. RANDAZZA,
Plaintiffs, Counter Defendant
Plaintiff, Jennifer Randazza

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<input type="checkbox"/> ENTERED	<input type="checkbox"/> SERVED ON
COUNSEL/PARTIES OF RECORD	
SEP 28 2015	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

Motion Requesting permission to file a motion for Summary Judgement

Cox claims due to Marc Randazza filing for Bankruptcy on August 28th 2015, and the continued stalling of this case, she moves this court to allow her to file her case now as a Summary Judgement and to move on with her life. This case is 3 years in and Randazza continues to stall. Cox wants this case to be done and this court to rule on her case.

Counter Plaintiff Cox claims it is unlawful file use a Bankruptcy filing to avoid paying malpractice costs owed to her.

Randazza has stalled this case for years, Cox has clear and convincing proof and wants to ensure that attorneys do not do this to others, Cox moves this court for a ruling in this case, despite the bankruptcy to send a clear message that it is unacceptable for attorneys to violate the rights of their clients, and then simply file bankruptcy.

If that's the case then all attorney can take advantage of clients and then file for bankruptcy and avoid judgements and claims, are there no checks and balances, the Nevada Bar, Malpractice to protect clients from attorneys?

This case is a landmark case in client rights and even if Randazza filed for bankruptcy never gets to settlement or trial over these matters, this court has the power to issue rulings. Rulings that will ensure the rights of attorney's clients everywhere.

Marc Randazza stalled Cox's counterclaims in the District of Nevada case by appealing a Judge's ruling to the Ninth Circuit regarding Anti-Slapp laws in Nevada which he personally co-wrote. This stayed the District of Nevada case pending the Ninth Circuit appeal decision. Randazza was to file an opening brief in that case in August of 2015, however he extended the filing deadline, then on

August 28th, 2015 he filed bankruptcy. Randazza then filed this Bankruptcy Notice of filing in the Ninth Circuit case and thereby froze those proceedings as well.

Cox claims that Randazza premeditated these actions and planned a bankruptcy all along, and stalled in order to create trusts, spend money, hide money offshore, file for a divorce to hide money with his wife and her family and make it look like he simply, one day, could not pay his creditors nor be liable to the clients he had intentionally harmed.

Randazza continued to harm his clients and all the while knowing he was creating a massive liability. Cox's claims against Marc Randazza are clear and convincing, they are valid and the case has been going on since Nov of 2012, nearly 3 years now.

Cox has clear and convincing claims. Counter Plaintiff Crystal Cox requests permission from this court to file a motion for summary judgment in this case.

Counter Plaintiff Cox wishes for Randazza's liability insurance to Pay her what she feels she is owed and wants this court proceeding to move forward.

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/s/ Crystal L. Cox

Crystal L. Cox, Pro Se

Counter Plaintiff / Defendant

Certification of Service

On September 24, 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

Q

PO Box 2027
Port Townsend, WA 98368

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