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Attorney for Plaintiffs

MARC J. RANDAZZA, JENNIFER RANDAZZA, and NATALIA RANDAZZA

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

MARC J. RANDAZZA, an individual,	)	Case No. 2:12-cv-02040
JENNIFER RANDAZZA, an individual, and	)	
NATALIA RANDAZZA, a minor,	)	<b>PLAINTIFFS' OPPOSITION TO</b>
	)	<b>DEFENDANT CRYSTAL COX'S</b>
Plaintiffs,	)	<b>MOTION REQUESTING PROTECTIVE</b>
	)	<b>ORDER</b>
vs.	)	
	)	
CRYSTAL COX, an individual, and ELIOT	)	
BERNSTEIN, an individual,	)	
	)	
Defendants.	)	

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Plaintiffs Marc J. Randazza, Jennifer Randazza, and Natalia Randazza, through counsel, hereby submit this response in opposition to Defendant Crystal Cox's Motion Requesting Protective Order.

As if it were not abundantly clear on its face, Defendant Cox's claims that she is in fear for her life and requires a protective order against Marc Randazza and his counsel are unfounded. Plaintiffs believe that Cox's arguments are so unmeritorious that Plaintiffs decline to specifically address them in this Opposition. If the Court believes that Cox's specific allegations should be addressed, Plaintiffs will do so upon the Court's request.

1 Plaintiffs' counsel Ronald D. Green has attempted to contact pro se Defendant Cox twice to  
2 schedule a phone call to confer about a discovery plan, as is required within thirty days of the filing  
3 of an answer pursuant to Local Rule 26-1:

4 The parties shall meet and/or confer as required by Fed. R. Civ. P. 26(f) within  
5 thirty (30) days after the first defendant answers or otherwise appears. Fourteen  
6 (14) days after the mandatory Fed. R. Civ. P. 26(f) conference, the parties shall  
submit a stipulated discovery plan and scheduling order.

7 LR 26-1(d). A copy of both emails Plaintiffs' counsel sent to Cox are attached as Exhibit A.  
8 Given that Cox has represented herself previously in the *Obsidian Finance, LLC v. Cox* case, Cox  
9 likely is already familiar with the discovery process. Defendant Cox's assertion that Plaintiffs'  
10 attempt to comply with discovery rules is somehow a veiled threat to her safety is unfounded and  
11 offensive.

12 Plaintiffs respectfully request this Court deny Cox's Motion Requesting Protective Order,  
13 and that the Court issue an order not only denying the motion, but admonishing Cox that further  
14 frivolous notices will be met with sanctions.

15  
16 Dated: January 17, 2013

Respectfully submitted,

17 /s/Ronald D. Green

18 Ronald D. Green, NV Bar #7360

19 Randazza Legal Group

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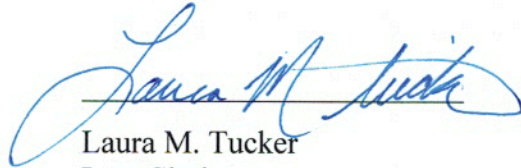
21 [ecf@randazza.com](mailto:ecf@randazza.com)

**CERTIFICATE OF SERVICE**

Pursuant to the Federal Rules of Civil Procedure 5(b), I hereby certify that the foregoing document was filed using this Court's CM/ECF system on January 17, 2013.

Dated: January 17, 2013

Respectfully Submitted,



Laura M. Tucker

Law Clerk

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