

Crystal L. Cox
Pro Se Defendant
Pro Se Counter Plaintiff
Case 2:12-cv-02040-GMN-PAL

SavvyBroker@Yahoo.com

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

Plaintiff, Counter Defendant Marc J. Randazza /

First Motion Request for Admissions,
Answers Requested from Marc J. Randazza
to Defendant Crystal Cox's Questions

v.

Defendant Crystal Cox and Defendant Eliot Bernstein

I, Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox request this court to order Plaintiff / Counter Defendant Marc J. Randazza, under oath, to answer this Motion Request for Admissions, Answers to Defendant Crystal Cox Questions, as Follows:

Have you, Marc J. Randazza, had any private emails, phone calls, faxes, text messages, social network communications, twitter communications, facebook communications, in chamber meetings, lunches, meetings of any kind, or correspondence of any kind, that you have not disclosed to Pro Se Defendant / Counter Plaintiff Crystal L. Cox with Judge Marco Hernandez, Judge Gloria Navarro, Judge Peggy Leen, or any Nevada Court Clerk or Oregon Court Clerk regarding Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox in any way. If so when and what was your topic of discussion.

Have you, Marc J. Randazza, had any private emails, phone calls, faxes, text messages, social network communications, twitter communications, facebook communications, or correspondence of any kind, that you have not disclosed to Pro Se Defendant / Counter Plaintiff Crystal L. Cox with any business associates, past personal or business relationships of Crystal Cox in any way, regarding Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox in any way. If so when and what was your topic of discussion.

Have you, Marc J. Randazza, had any private emails, phone calls, faxes, text messages, social network communications, twitter communications, facebook communications, meetings of any kind, letters of any kind, document or memo exchange of any kind, or correspondence of any kind, that you have not disclosed to Pro Se Defendant / Counter Plaintiff Crystal L. Cox with ANY of the following list of Counter Defendants, Alleged Co-Conspirators:

If so please describe when, where and what your topic of discussion was with ANY of the following in any way:

Any attorney from or with Greenberg Traurig Law Firm, Nevada, Florida, Boston, Denver, London, Las Vegas, Miami, Chicago, New York, New Jersey.

Kenneth P. White, California Individual personally and professionally

Any attorney at Brown, White and Newhouse Law Firm.

Kashmir Hill of Forbes

Anyone at or pertaining to Forbes Inc.

Anyone at or pertaining to Godaddy Inc.

Bob Parsons, or Jessica Griffin of Godaddy.

Anyone at or pertaining to Tonkon Torp Law Firm, any Tonkon Torp Lawyer

David S. Aman, Michael Morgan, Steven Wilker,

Anyone at or pertaining to Proskauer Rose Law Firm, or any attorney with Proskauer Law Firm.

Kenneth Rubenstein, Allen Fagin, Gregg (Greggory) Mashberg, Jenifer DeWolf Paine, Joseph Lecesce,

Anyone at or pertaining to Obsidian Finance Group, Oregon Corporation, Washington Corporation

David W. Brown, Kevin D. Padrick,

Anyone at or pertaining to WIPO

Francis Gurry, Erik Wilbers,

Peter L. Michaelson,

Anyone at or pertaining to New York Times, David Carr,

Anyone at or pertaining to Philly Law Blog

Jordan Rushie, ,

Leo M. Mulvihill, Jr.

Anyone at or pertaining to Mulvihill & Rushie, LLC.

Anyone at or pertaining to SaltyDroid, Jason Jones Esq.

Janine Robben

Anyone at or pertaining to Oregon State Bar Bulletin

Anyone at or pertaining to Liberty Media Holdings

John C. Malone,

Anyone at or pertaining to Corbin Fisher

Anyone at or pertaining to XBIZ,

Anyone at or pertaining to the Las Vegas Tribune

Anyone at or pertaining to Manwin, Business, Corporation, LUXEMBOURG, Montreal Canada,
Los Angeles

Bob Garfield,

Anyone at or pertaining to NPR, New York Public Radio

Tracy L. Coenen

Anyone at or pertaining to SequenceInc.com, Wisconsin

Mark Bennett,

Anyone at or pertaining to blog.bennettandbennett.com, Bennett and Bennett.

Scott H. Greenfield, Carlos Miller, John Calkins Sony

Eric Turkewitz

Matthew M. Triggs

Anyone at or pertaining to Turkewitz Law Firm and NewYorkPersonalInjuryAttorneyBlog.com,

Scott H. Greenfield of Simple Justice -

Anyone at or pertaining to blog.simplejustice.us

Brian Tannenbaum

Carlos Miller of PixIQ.com and PhotographyisNotaCrime.com, y

Roxanne Grinage,

Anyone at or pertaining to HireLyricsI

Sean Boushie

University of Montana, Missoula Montana

Royce Engstrom, Missoula Montana

Bernie Cassidy, Libby Montana County Attorney

Taylor Kai Groenke (Kai Groenke),

Martin Cain, Dylan Energy,

APPLE, California Corporation

Steve Dowling, Bruce Sewell,

Doug Chey, Douglas D. Chey

Tim Vawter, The Protection Group Video

Judge Gloria M. Navarro personally and Professionally,

Daniel Staton Professional and Personally,

Marshall Ross Professional and Personally

Anyone at or pertaining to Multnomah County Sheriff's Office

Anyone at or pertaining to Intel Corp.

Steven Rodgers Vice President & Deputy General Counsel at Intel Corporation

Mark Vena,

David Wang,

Anyone at or pertaining to Synaptics,

Bret Sewell,

EDWARD KWAKWA,

P. Stephen Lamont,

Ari Bass - Michael Whiteacre,

Sean Tompkins,

Mercedes Ashley

Tara Akinlose

Leo M. Mulvihill,

Mulvihill & Rushie LLC, Philadelphia, PA Law Firm

Free Speech Coalition, California Non-Profit

Diana Duke

Liberty Media Holdings Connected Companies: Liberty Capital, AOL Inc. (1% through Liberty Capital and 2% through Liberty Interactive), Barnes and Noble Inc. (17%), CenturyLink Inc. (1%) Crown Media Holdings Inc. (3%), Current Communications Group LLC. (8% through Liberty Partners and Liberty Associated Partners), Jingle Networks Inc. (9% through Liberty Partners and Liberty Associated Partners), Kroenke Arena Company LLC. (7%), Live Nation Entertainment Inc. (21%), Mobile Streams Inc. (16%), Motorola Mobility Inc. (2%) Motorola Solutions Inc. (2%), Priceline.com Inc. (1%), Sirius XM Radio Inc. (40%) Sprint Nextel Corporation (2%), Time Warner Cable Inc. (1% through Liberty Capital and 2% through Liberty Interactive), Time Warner Inc. (1% through Liberty Capital and 2% through Liberty Interactive), Viacom Inc. (1%)

Continued Questions for Marc J. Randazza to Answer Under Oath

Did You, at any time conspire or discuss in any way the securing or ownership of the Domain Name Marc Randazza .com through any conversation, paperwork, emails, communications with Plaintiff Kevin Padrick, or Plaintiff's Attorney David S. Aman of Tonkon Torp Law Firm ?

Did You, at any time conspire or discuss in any way the securing or ownership of the Domain Name Marc Randazza .com through any conversation, paperwork, emails, communications with Monica Foster aKa Alex Melody?

Did you ever threaten or intimidate Monica Foster aKa Alex Melody in any way?

Marc Randazza, did you conspire with Jessica Griffin at Godaddy to move the Domain Name JenniferRandazza.com from Monica Foster's Godaddy account to yours?

Did You, at any time discuss with Plaintiff Kevin Padrick, or Plaintiff's Attorney David S. Aman of Tonkon Torp Law Firm in regard to you, Marc Randazza or any Associate of yours owning the Domain Name Marc Randazza .com if you agreed to be Subpoenaed or Testify in regard to the Assets of Crystal Cox?

Did You initiate contact, at any time with Plaintiff Kevin Padrick, or Plaintiff's Attorney David S. Aman of Tonkon Torp Law Firm in regard to the Domain Name Marc Randazza .com and offer

to Testify against Crystal Cox in any way?

Did You initiate contact, at any time with Plaintiff Kevin Padrick, or Plaintiff's Attorney David S. Aman of Tonkon Torp Law Firm in regard to any negotiations on behalf of a legal matter, lawsuit, judgement or case regarding Crystal L. Cox (Crystal Cox) ?

Marc Randazza, did you tell members of the First Amendment Bar that you Represented Crystal Cox?

Marc Randazza, did you tell any members of the First Amendment Bar that you were negotiating with the Plaintiff in Obsidian V. Cox to make some sort of agreement or financial settlement to make the Crystal Cox verdict go away?

Marc Randazza, what deal did you present to Tonkon Torp Law Firm David Aman, or the Plaintiff in any way in regard to the Obsidian V. Cox Case?

Marc Randazza, did you, at any time, contact the Plaintiff and attempt to negotiate a deal on behalf of Crystal Cox?

Marc Randazza, did you, at any time, contact the Plaintiff and attempt to negotiate a deal in regard to Obsidian V. Cox in ANY way?

Marc Randazza, Did you make any kind of deal or offer to make, negotiate a deal of ANY kind, via phone, email, text, letter or any other form of communication with Tonkon Torp Law Firm or David Aman, or Plaintiff Obsidian Finance Group or Kevin Padrick in any way, claiming that you represented Crystal Cox in any way?

Marc Randazza did you lead Crystal Cox to believe you were considering representing her to get information to take to the Plaintiff to negotiate a Deal and then NOT get back to Crystal Cox on this Matter?

Marc Randazza did you threaten Pro Se Defendant Crystal Cox that if she did not give you a Domain Name that you would make an Enemy of Her?
.... IF so What Did you Mean By This?

Marc Randazza, Did you contact Tonkon Torp Law Firm or David Aman, or Plaintiff Obsidian Finance Group or Kevin Padrickin via phone, email, text, letter or any other form of communication to offer to help Plaintiff in Obsidian V. Cox, in some sort of revenge regarding a personal feud, your personal Opinion of Crystal Cox or actions she took, or a personal vendetta that you had or have against Crystal Cox,?

Marc Randazza, did you communicate in any way with David S. Aman, Tonkon Torp Attorney, or advise David S. Aman, Tonkon Torp Attorney or Steven Wilker of Tonkon Torp on how to file legal documents to SEIZE Crystal Cox's Right to Appeal as an Asset?

Marc Randazza did you contact Plaintiff's Attorney David Aman of Tonkon Torp and offer to Give a Deposition in Regard to Crystal Cox, Pro Se Defendant in Obsidian V. Cox?

Marc Randazza can you provide this court with documentation of all communications between you and Plaintiff and or Plaintiff's Attorney?

Marc Randazza did you tell Crystal Cox that it did not bother you that she asked for a Job? ...if So why did you then go to the Plaintiff's Attorney and tell them differently?

Marc Randazza did you email Crystal Cox and tell her that you had nothing to do with her case and therefore she had no right to register a Domain Name resembling your Name?

Marc Randazza did you tell WIPO Panelist Peter L. Michaelson that Crystal Cox and / or Eliot Bernstein were guilty of the Crime of Extortion?

Marc Randazza did you tell Forbes, NPR, the New York Times or any other media outlet or blog owner that Crystal Cox and / or Eliot Bernstein were guilty of the Crime of Extortion?

Marc Randazza is it illegal to register a Domain Name with another Person's name included in the actual Domain Name ?

Marc Randazza, do you have a legal Trademark on the name "Randazza" or "Marc Randazza"?

Marc Randazza is it a Trademark violation to use the last name of anyone in a domain name of blog name?

Marc Randazza is it illegal to email a prior associate or contact and ask for a job, or if they know anyone needing a particular service?

Marc Randazza, is it an ICANN, UDRP Rule, or Law of any kind that grants legal right to change domain name servers in a court filing, simply because a lawsuit is filed?

Marc Randazza did you have an attorney, client relationship with Crystal Cox at any time?

Marc Randazza did you say this to Crystal Cox, "I do not find it to be acceptable that someone else has registered my name for any purpose, and thus I can't possibly see any reason for you to have any control over that domain whatsoever -" ?

In your Expert Opinion, Does Crystal Cox have a legal and constitutional right to buy and own a domain name, with another person's name in the Domain Name?

Marc Randazza did represent the owner of GlenBeckRapedAndMurderedAYoungGirln1990.com, and fight on the site of the domain owners rights to own that domain name and win?

Marc Randazza, in the Ranaan Katz case did you state that preliminary injunctions were unconstitutional and especially without first amendment adjudication?

Marc Randazza, what did you mean by this statement to Ms. Cox "I'm not interested in WIPO. You want to make an enemy of me, really?" ?

Marc Randazza did you make this statement to Ms. Cox, "You have no right to register a domain name that corresponds to my real name. Please hand that domain name over to me, and please do not presume to think it is okay to register other people's names as domain names."?

Marc Randazza did you represent Isaac Eiland-Hall in a WIPO Domain Name Dispute Regarding the domain name, www.GlennBeckRapedAndMurderedAYoungGirln1990.com" ? Do you believe that Isaac Hall had a legal right to have registered and own the domain name www.GlennBeckRapedAndMurderedAYoungGirln1990.com" ?

Marc Randazza, did you argue, as legal counsel, the right for Isaac Eiland-Hall to own a domain name that corresponds to the real name of Glenn Beck?

Marc Randazza did you ever represent Crystal Cox as her Attorney?

Marc Randazza, Did you contact Tonkon Torp Law Firm or David Aman, or Plaintiff Obsidian Finance Group or Kevin Padrick via phone, email, text, letter or any other form of communication and discuss any personal information regarding your phone call, interview with Crystal Cox, leading Crystal Cox to believe you may represent her as Counsel in an Appeal for Obsidian V. Cox?

Marc Randazza did you ever tell anyone that you represented Crystal Cox as your Attorney?

Marc Randazza, Did you make any kind of deal via phone, email, text, letter or any other form of communication to or with Tonkon Torp Law Firm or David Aman, or Plaintiff Obsidian Finance Group or Kevin Padrick in any way, to assist in securing the Domain Name Marc Randazza .com ?

Did you, Marc Randazza, make a deal of any kind, that after the Plaintiff forcible secured the Domain Name Marc Randazza .com that you would get control or ownership of this Domain Name?

Marc Randazza, did you recommend Lara Pearson to David Aman Tonkon Torp Attorney as a Receiver, the same one you used in Righthaven via Judge Gloria Navarro?

Marc Randazza, did you email Crystal Cox and Say, "Ok, you made your point. So what do you want? " If So, Marc Randazza, What did you Mean By this Email?

Marc Randazza, did Crystal Cox have a blog with your daughters name on it, or a blog post in any way that you personally, under oath witnessed, or saw?

Marc Randazza, did you give Forbes a photo of your daughter and claim that Crystal Cox had a blog regarding your daughter?

Marc Randazza, have you had anything to do with or benefitted in any way from the website PornWikiLeaks.com?

Marc Randazza, do you personally know Donny Long aKa Donald Carlos Seoane or know if he is alive, or of any alleged co-conspirators involved in his alleged murder?

Marc Randazza have you ever had lunch or private communication of any kind with Judge Gloria Navarro.

Marc Randazza have you ever had lunch, dinner, drinks or private communication of any kind at all with WIPO panelist Peter L. Michaelson?

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed using this Court's CM/ECF system **On February 13th 2013** and a copy emailed Randazza Legal Group at eMail rdg@randazza.com and lmr@randazza.com

Respectfully Submitted
Pro Se Defendant
Pro Se Counter Plaintiff
Crystal L. Cox
Case 2:12-cv-02040-GMN-PAL