

Crystal L. Cox
Pro Se Defendant
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 /

Defendant Crystal Cox's OBJECTION to
Plaintiff's MOTION FOR SUMMARY JUDGMENT

v.

Defendant Crystal Cox and Defendant Eliot Bernstein

Notice To Court: This Court has DENIED requests to sign a conflict of Interest Disclosure, though requested several times by Pro Se Defendant / Pro Se Counter Plaintiff Crystal L. Cox. Any action forward by Judge Gloria M. Navarro or Judge Peggy A. Leen, who refuses to admit/deny conflicts and rules forward will be charged with Obstruction of Justice through conflicts of interest, violations of attorney and judicial cannons in order to Deny Due Process via aiding and abetting the alleged civil and criminal conspiracy through Fraud on the Court.

I, Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox intend to file criminal complaints against any officer of the court, including opposing counsel, who violates any law or ethical statues in order to perpetrate the fraud through obstruction via conflicts, or has violated any law already in previous rulings affecting me, Pro Se Defendant, Pro Se Counter Defendant Crystal Cox.

Therefore every ruling of this court on a motion without conflict disclosure will be charged for each and every act a in a criminal complaint, forthcoming.

Judge Gloria Navarro is alleged by Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox to be acting in criminal and civil conspiracy with Plaintiff / Counter Defendant Marc J. Randazza and ALL Connected Co-Conspirators and Counter Defendants of District of Nevada Case 2:12-cv-02040-GMN-PAL and therefore this court has a duty to notify all applicable authorities, bond carriers, insurance carriers, AND State and Federal Auditors of the liability of this allegation in a Federal Court Proceeding.

I, Pro Se Defendant / Pro Se Counter Plaintiff Crystal L. Cox object to Plaintiff's MOTION FOR SUMMARY JUDGMENT.

Plaintiff Claims I have not disputed facts, when I, Pro Se Defendant / Pro Se Counter Plaintiff Crystal L. Cox have disputed Plaintiff's Allegations over and over to the absolute best of my ability. Plaintiffs / Counter Defendants have not Disputed ONE Allegation I have Claimed against them in my Counter Complaint, however.

Plaintiff has not made one valid point of law in which entitles them to a Summary Judgement, instead Plaintiff has used this MOTION FOR SUMMARY JUDGMENT as further harassment, intimidation, defamation to Pro Se Defendant / Pro Se Counter Plaintiff Crystal L. Cox.

I, Pro Se Defendant / Pro Se Counter Plaintiff Crystal L. Cox, "genuinely" dispute ALL claims in Plaintiff's claims against me and have repeatedly.

Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox has not had a "campaign" in bad faith to harass Plaintiff. Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox has fought back against Plaintiff and Counter Defendants attack on her. This court should not grant summary judgement to Plaintiff, as Plaintiff has simply used the courts in bad faith to ATTACK a blogger he does not like, or approve of her blog content and to wipe out his competition in the search engines by using the courts.

Plaintiff and Co-Conspirators have taunted me, harassed, me, defamed me, attacked me constantly and the only way I have to fight back is to post my proof online. It is a violation of my Freedom of Expression and my First Amendment Rights to stop the flow of information on my blogs, to delete my blogs, redirect my domain names and harass me.

For More Detailed Information on these Objections, and Reasons why Please See Memorandum to Defendant Crystal Cox's OBJECTION to Plaintiff's MOTION FOR SUMMARY JUDGMENT, submitted to this court with this Objection to Plaintiff's MOTION FOR SUMMARY JUDGMENT.

Plaintiff continues to LIES to this court and to publicly defame me in court documents, as I did NOT extort Plaintiff. I asked Plaintiff for a Job, and he was upset at a Domain Name I owned and then contacted the Plaintiff in Obsidian V. Cox and conspired to set me up for extortion in revenge for me owning a domain name he did not approve of. If he thought he had a Trademark then why not just take the name from me, Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox or from Monica Foster when she owned it.

Plaintiff offered Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox and Monica Foster for the domain name and we both turned him down.

There was no Cyber Extortion and if Plaintiff really believes this and has evidence of this then Plaintiff should file a criminal complaint so that I, Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox, am entitled to due process of law. Instead Plaintiff is abusing his power over the courts and simply stating I am guilty of extortion with no proof, no evidence of Extortion.

I did not offer Reputation Services and then attack Plaintiff in the search engines to retaliate. I asked for a job, he said no and then demanded I turn over domain names. I stood up for myself and he conspired with others to ruin me and to make it look like I was guilty of the crime of extortion.

For More Detailed Information on these Objections, and Reasons why Please See Memorandum to Defendant Crystal Cox's OBJECTION to Plaintiff's MOTION FOR SUMMARY JUDGMENT, submitted to this court with this Objection to Plaintiff's MOTION FOR SUMMARY JUDGMENT.

I, Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox, was not on trial for extortion, never had due process of law for this accusation, never had a criminal investigation, yet Counter Defendant / Plaintiff Marc Randazza and Co-Conspirators continue to publicly state that I am guilty of extortion. Why not file criminal charges, and then if a court of law convicts me of extortion, then publish Crystal Cox is an Extortionist. Defendant / Plaintiff Marc Randazza and Co-Conspirators did not do this, they simply attacked me, painted me in false light and made me look to be an extortionist when that is not true.

I have made a living from Real Estate and from Online Supplements, My Anti-Corruption Blogs have been to give victims of corruption a voice. The search engine management offer in the Obsidian V. Cox case was part of a Settlement Negotiation, a month after a legal threat, and a week after a 10 Million Dollar Lawsuit was filed against me. There were approx. 10 Settlement Offers in that case. Those emails were between two attorneys negotiating a settlement, I was Pro Se and acting in my Pro Se Capacity, and this ONE email out of 5 was used out of context to defame and harass, Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox, and to retaliate against me, AFTER David Aman, Tonkon Torp, Opposing Counsel had already won a 2.5 Million Dollar Judgement.

Counter Defendant / Plaintiff Marc Randazza saw those eMails, he had ALL my files, and he negotiated with David Aman, Tonkon Torp on my behalf in the Obsidian Case. As per those he told in the First Amendment Bar that he represented me and was negotiating a deal.

Counter Defendant / Plaintiff Marc Randazza acted with intentional harm against Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox,, when he broadcast that I am an Extortionist and continues to accuse me, using the courts to further harass and defame me and State that I am guilty of a crime that I am NOT guilty of nor have been charged with, little own prosecuted for.

Counter Defendant / Plaintiff Marc Randazza does not have the legal or constitutional right to, in retaliation, hate or whatever reason to simply accuse who ever he please of a crime and then broadcast that accusation as fact, BEFORE an innocent victims, such as Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox is permanently harmed and defamed.

Counter Defendant / Plaintiff Marc Randazza had my personal information, confidential details of my life and my strategy, and Defendant / Plaintiff Marc Randazza knew that I had not been on trial for extortion nor charged with extortion, he had seen ALL my files. Counter Defendant / Plaintiff Marc Randazza had requested all these files as email records show, BEFORE he negotiated with David S. Aman, Opposing Counsel in the Obsidian V. Cox case.

For More Detailed Information on these Objections, and Reasons why Please See Memorandum to Defendant Crystal Cox's OBJECTION to Plaintiff's MOTION FOR SUMMARY JUDGMENT, submitted to this court with this Objection to Plaintiff's MOTION FOR SUMMARY JUDGMENT.

I, Pro Se Defendant / Pro Se Counter Plaintiff Crystal Cox am one woman. Counter Defendant / Plaintiff Marc Randazza has a strong blog, several online sites that are very strong, and lots of connections with other attorneys and big media. When he posted that I was an Extortionist, the only way I had to post the facts, and to save my reputation was to start multiple blogs. The more I started, the more he got deleted. This is not a "Google Bomb", it is an internet marketing tactic to get my story found in the search engines. Instead of using co-conspirators as the Plaintiff does in this case and in Rakofsky V. the Internet, I am simply use my own sites and post in my own name. This is not a Google Bomb nor cybersquatting, it is online competition in the search engines, in which Plaintiff Marc Randazza used this court to simply wipe out all my work, and without any due process or First Amendment Adjudication.

Counter Defendant / Plaintiff Marc Randazza states that ""Defendants Crystal L. Cox ("Cox") and Eliot Bernstein ("Bernstein") registered the Infringing Domain Names (as defined in ECF #1 at 6-7) in an attempt to extort Plaintiffs and in violation of the Anti-cybersquatting Consumer Protection Act (the "ACPA") (15 U.S.C. § 1125(d)), individual cyberpiracy protections (15 U.S.C. § 8131), and rights of publicity under the laws of the State of Nevada Plaintiffs, as well raised common law claims of intrusion upon seclusion and publicity and civil conspiracy. Plaintiffs' claims arise from Defendants' registration and use of Plaintiffs' personal names as Internet domain names."

Plaintiff flat out lies to this court, as Plaintiff knows full well that Eliot Bernstein never registered those domain names. Plaintiff deliberately lies in court documents to defame and harass Defendants Crystal L. Cox and Defendant Eliot Bernstein. Counter Defendant / Plaintiff Marc Randazza is very familiar with Obsidian V. Cox, and Plaintiff knows that there are documents filed as to how and why Defendant Eliot Bernstein got those domain names. Yet, Counter Defendant / Plaintiff Marc Randazza deliberately lies to this court in retaliation. Counter Defendant / Plaintiff Marc Randazza represents clients who LITERALLY owe Eliot Bernstein billions of dollars. This lawsuit naming iViewit Founder Eliot Bernstein is simply to attempt to discredit, harass, defame and intimidate Eliot Bernstein and to remove blogs that expose the iViewit Technology theft, with is the biggest technology crime in the world, EVER.

Counter Defendant / Plaintiff Marc Randazza knowingly lies about domain names being registered to Extort him somehow, that has no TRUTH what so ever to it. Neither Defendant EVER asked Marc Randazza for money and said they would post "bad faith" or anything at all if he did not pay, there WAS not Extortion. Counter Defendant / Plaintiff Marc Randazza continues to use court documents, Big Media, blogs and more to defame, taunt, harass, retaliate, bully and paint in false light, Defendant / Counter Plaintiff Crystal L. Cox and Defendant Eliot Bernstein. There is not VIOLATION of the Anti-cybersquatting Consumer Protection Act (the "ACPA") (15 U.S.C. § 1125(d)), there was NO bad Faith. There was and is not rights of publicity under the laws of the State of Nevada Plaintiffs and even if the Nevada courts found this to be so, then the blogs could be banned ONLY In Nevada.

Counter Defendant / Plaintiff Marc Randazza is an expert in this industry, Plaintiff knows that he is lying to this court deliberately to defame, attack and paint Defendants in false light.

Counter Defendant / Plaintiff Marc Randazza is NOT a household name and does not have an automatic, exclusive right over the the name "Randazza" or "Marc Randazza" and Plaintiff Does not have a Right to exclude ONE investigative Blogger from reporting on, publishing, using the name Randazza" or "Marc Randazza".

Counter Defendant / Plaintiff Marc Randazza, as in the Domain Name GlenBeckRapedAndMurderedAYoungGirlIN1990.com and other Domain Name Cases, has himself represented the domain name owner and argued in favor of the constitutional and lawful right of the domain owner to own that domain name. Yet, in a complete opposite, hypocritical defense in this case, Counter Defendant / Plaintiff Marc Randazza claims that CCC has no right to own such a name with the name Randazza in it, as that name is his and his alone to use. As if to say no reporter, no news, no blog, no media can utter the word "Randazza" or "Marc Randazza" without his exclusive permission and that simply is not true.

For More Detailed Information on these Objections, and Reasons why Please See Memorandum to Defendant Crystal Cox's OBJECTION to Plaintiff's MOTION FOR SUMMARY JUDGMENT, submitted to this court with this Objection to Plaintiff's MOTION FOR SUMMARY JUDGMENT.

Counter Defendant / Plaintiff Marc Randazza Says "Specifically, Cox registered Plaintiff Randazza's personal name, under which he has conducted business at his well-known law firm, in multiple domain names and attempted to extort Plaintiff, as is her demonstrated modus operandi (See "Why an Investment Firm was Awarded \$2.5 Million After Being Defamed by Blogger, attached as Exhibit B) by offering her "reputation management services" in order to "fix" Randazza's business reputation that she, herself, harmed."

Counter Defendant / Plaintiff Marc Randazza disturbingly continues to involve his young daughter, as if to get sympathy from the courts and public at large. Counter Defendant / Plaintiff Marc Randazza knows full well that CCC never had a blog regarding his daughter, never posted ONE WORD regarding her, and yet Counter Defendant / Plaintiff Marc Randazza used his own daughter to paint ccc in false light and defame me, make me look like a monster to the public and use her to STEAL blogs he has no right to. Counter Defendant / Plaintiff Marc Randazza gave picture of his young daughter to big media and flat out lied that I had blogged about her when I did not EVER publish anything in regard to his daughter.

Counter Defendant / Plaintiff Marc Randazza even added his daughter to this lawsuit as a Plaintiff, that is SICK. I, Defendant / Counter Plaintiff Crystal L. Cox have not mentioned her name and I have not counter sued Plaintiff's Daughter and Wife, deliberately, as neither had anything to do with Counter Defendant / Plaintiff Marc Randazza's hate, rage and retaliation tactics against Defendant / Counter Plaintiff Crystal L. Cox. Counter Defendant / Plaintiff Marc Randazza continues to use court dockets to lie about and defame Defendant / Counter Plaintiff Crystal L. Cox. And he continues to use his young child as a weapon in the courts, SICK.

Counter Defendant / Plaintiff Marc Randazza claims that owning a person's name in a domain name is fine if it's his client, yet wages a retaliation legal war against Defendant / Counter Plaintiff Crystal L. Cox for owning such a Name. Counter Defendant / Plaintiff Marc Randazza LIES to this court in AGAIN stating that I tried to extort his well known law firm. First of all he is NOT well known, not a common household name. Secondly, I, Defendant / Counter Plaintiff Crystal L. Cox, NEVER ever attempted to use a domain name to Extort Marc Randazza, as email records show I told him I would not SELL the domain name at ANY price and in FACT gave it to Investigative Blogger Monica Foster to help expose human trafficking, bad things happening to kids in porn, prostitution rings, whistleblower retaliation and all that she exposes on PornNewsToday.com.

Monica Foster aKa Alexandria Melody, was threatened by Marc Randazza and Co-Conspirators / Counter Defendants, she was in fear of her life and therefore I told her I would take the domain name back. Shortly after that, Counter Defendant / Plaintiff Marc Randazza filed a fraudulent WIPO Claim, and then filed this Lawsuit in retaliation.

Counter Defendant / Plaintiff Marc Randazza claims this "by offering her "reputation management services" in order to "fix" Randazza's business reputation that she, herself, harmed." This is FALSE. I never EVER offered to "FIX" Randazza's business reputation, email records show that I, Defendant / Counter Plaintiff Crystal L. Cox, never said that. Counter Defendant / Plaintiff Marc Randazza continues to use his power in the courts to defame and flat out lies about ccc.

I, Defendant / Counter Plaintiff Crystal L. Cox, never wrote ONE word about Marc Randazza when I sent the email asking for a Job. I posted blogs regarding Counter Defendant / Plaintiff Marc Randazza AFTER he contacted the Plaintiff and the Judge in my Obsidian V. Cox case and conspired to set me up for a Crime, I started the blogs AFTER that to Defend Myself from his RAGE and retaliation.

Counter Defendant / Plaintiff Marc Randazza should not be able to simply LIE to a court and because he is an attorney, it is taken as fact. Counter Defendant / Plaintiff Marc Randazza should not be able to submit blogs to the courts of his co-conspirators and have those blog posts used as evidence to harm his intended target, defendant.

Counter Defendant / Plaintiff Marc Randazza is flat out lying about Defendant / Counter Plaintiff Crystal L. Cox Extorting him. Email records and communications PROVE there was no Extortion. YET, Counter Defendant / Plaintiff Marc Randazza continues to use motions in the courts to attack, defame, taunt, harass, bully and paint Defendant / Counter Plaintiff Crystal L. Cox in false light INTENTIONALLY.

Counter Defendant / Plaintiff Marc Randazza continues to use Kashmir Hill's post about CC to defame CC." (See "Why an Investment Firm was Awarded \$2.5 Million After Being Defamed by Blogger, attached as Exhibit B) "

Kashmir Hill of Forbes is from AboveTheLaw.com, and Counter Defendant / Plaintiff Marc Randazza is their attorney. Kashmir Hill of Forbes is a co-conspirator and that article is DEFAMATION with actual malice. Kashmir Hill of Forbes is liable for the defamation in that post. Counter Defendant / Plaintiff Marc Randazza knows the information is false, yet uses Kashmir Hill's post as some sort of evidence that Defendant / Counter Plaintiff Crystal L. Cox did something unlawful or prove that Defendant / Counter Plaintiff Crystal L. Cox extorted him, or did something that would warrant deletion of massive online content, stealing domain names, removing blogs, redirecting servers and constantly attacking and harassing Defendant / Counter Plaintiff Crystal L. Cox .

Counter Defendant / Plaintiff Marc Randazza told me Defendant / Counter Plaintiff Crystal L. Cox, that if I did not GIVE him the Domain Name he wanted, he would make me an ENEMY. Now that's Extortion and he sure did follow through. Counter Defendant / Plaintiff Marc Randazza has RUINED my life, with ACTUAL MALICE, actual knowing of the Facts of the Matter.

Counter Defendant / Plaintiff Marc Randazza Constantly Accuses Defendant / Counter Plaintiff Crystal L. Cox of being involved in a conspiracy that does not exist, meanwhile he daily conspires to harm Defendant / Counter Plaintiff Crystal L. Cox, retaliate, defame, intimidate and ruin Defendant / Counter Plaintiff Crystal L. Cox

Facts, Documented Facts and Evidence SHOULD be at Issue in this Case. Instead Plaintiff simply supplies this court with blog posts and words of co-conspirators, in which are NOT documented FACT.

For More Detailed Information on these Objections, and Reasons why Please See Memorandum to Defendant Crystal Cox's OBJECTION to Plaintiff's MOTION FOR SUMMARY JUDGMENT, submitted to this court with this Objection to Plaintiff's MOTION FOR SUMMARY JUDGMENT.

Counter Defendant / Plaintiff Marc Randazza blogs about Defendant / Counter Plaintiff Crystal L. Cox and constantly discusses his opinion of me on twitter, facebook, and encourages others to publish online about me, make videos lying about me and defaming me.

Plaintiff Stating this “Another District Judge, Marco Hernandez of the District of Oregon, euphemistically described Cox’s scheme as repairing the damage she had caused for a “tasteful” fee. Obsidian Finance Group LLC v. Cox, 2012 WL 1065484 (D. Ore. 2012).” Is defamatory. I was not on trial for extortion, this was in regard to a settlement negotiation communication, and has nothing to do with the material facts of Randazza V. Cox. This is placed in a Motion for a Summary Judgement, with Malice, to further paint Counter Plaintiff / Defendant Crystal Cox in false light, defame her, harass and intimidate her.

Counter Plaintiff / Defendant Crystal Cox posted remarks and poked fun at what Plaintiff Marc Randazza had said about his own wife, in a drunken tryst post on his own blog. Counter Plaintiff / Defendant Crystal Cox never EVER posted anything online regarding Marc Randazza’s child, he himself did that.

Again Counter Defendant / Plaintiff Marc Randazza uses the court docket, abuses his power, and defames, harasses Counter Plaintiff / Defendant Crystal Cox.

Counter Defendant / Plaintiff Marc Randazza Says, “Plaintiffs are not the only victims of the Cox scheme. Ms. Cox has targeted several dozen other victims, registering their full names as domain names and falsely accusing them of any manner of wrongdoings.” This is false and defamatory and has nothing to do with the material facts of Randazza V. Cox. I am a reporter, an investigative blogger, what Plaintiff refers to as victims, are subjects of my stories, and yes, of course I get the best keyword rich domain name I can to get strong in the search engines, that is taught in EVERY book and class regarding SEO and Internet Marketing. I have never asked for MONEY to remove any information, no have I ever written a story with the intention to ask for money to remove it. Nor has I ever stated that if you don’t pay me, I will post bad stuff. That is simply further defamatory fraud on the courts. I am an investigative blogger exposing corruption in New Media, with the best possible marketing techniques I know of. I have not extorted anyone nor received payment from anyone to remove information I have written.

Counter Defendant / Plaintiff Marc Randazza is discriminating against Citizen Journalists and Bloggers not affiliated with Big Media. The New York Times, Forbes and other Big Media posts stories daily on companies, individuals and they are not called victims. Often times the The New York Times, Forbes and other Big Media are asked to remove information or even sued for inaccurate information, this is not deemed Extortion. Why are my Investigative Blogs called Extortion? The reason is because those I expose for alleged corruption and the tips I get on them in which I post, they don’t like this information out there, so they claim me an Extortionist, when I have Extorted NO ONE, and received no money for such, nor been under investigation for the crime of Extortion, yet Counter Defendant / Plaintiff Marc Randazza and Counter Defendant Ronald Green continue to use this court docket to defame me and flat out state as fact that I have committed Extortion when I have not had due process, nor a criminal investigation or trial regarding this allegation. Yet Counter Defendant / Plaintiff Marc Randazza State it as fact.

For More Detailed Information on these Objections, and Reasons why Please See Memorandum to Defendant Crystal Cox's OBJECTION to Plaintiff's MOTION FOR SUMMARY JUDGMENT, submitted to this court with this Objection to Plaintiff's MOTION FOR SUMMARY JUDGMENT.

Counter Defendant / Plaintiff Marc Randazza State "Just as she has done with Plaintiff Marc Randazza, Cox then offers her "reputation services" to the people whose names she has registered. See Obsidian Finance Group, LLC v. Cox, 2012 WL 1065484 (D. Ore 2012) ("[D]efendant offered 'PR,' 'search engine management,' and online reputation repair services to Obsidian Finance, for a price of \$2,500 per month ... The suggestion was that defendant offered to repair the very damage she caused for a small but tasteful monthly fee");" I object to this statement, Obsidian V. Cox was a CIVIL trial regarding defamation, it had NOTHING to do with Extortion, which would be a Criminal Trial. This \$2500, was one sentence pulled from 5 emails between Pro Se Defendant Crystal Cox, acting in her Pro Se Capacity and David S. Aman, Tonkon Torp Opposing Counsel. These 5 emails were a Settlement Negotiation in response to a Cease and Desist Legal Threat and sent after a 10 Million Dollar Defamation Lawsuit had been filed by David S. Aman, Tonkon Torp on behalf of Federal Bankruptcy Trustee Kevin Padrick and his Company Obsidian Finance Group.

This one sentence, has been used out of context to retaliate on a Reporter exposing the clients of Counter Defendant / Plaintiff Marc Randazza and Counter Defendant David. S. Aman. The facts of the case are all of record, and Extortion was not a material fact. Also I, Counter Plaintiff / Defendant Crystal Cox object to speculation stating that "The suggestion was that defendant offered to repair the very damage she caused for a small but tasteful monthly fee" this is false, I only offered any negotiation, AFTER I had been threatened with a 10 Million Dollar Legal Action. This was a negotiation settlement communication to try and STOP the next several years of my life from being in legal action. The Plaintiff made 8 Settlement Offers to me, and they are not deemed Extortion yet the Plaintiff offered I pay them \$5000 every time I mention their name and that I blame my whistleblower and her father for my posts, which is illegal. This is all a matter of record.

Regarding this, "Randazza's name functions as a trademark. Randazza is an individual, an attorney, a legal author, and a resident of Clark County, Nevada. (ECF #1 ¶23; Randazza Decl. ¶ 1). Plaintiff is the owner and managing partner of RLG, with offices located in Nevada, Florida, and Arizona. (ECF #1 ¶ 23; Id.). Since 2008, RLG has done business using Marc Randazza's personal name as a source identifier for its services. (ECF #1 ¶ 23)."

Counter Defendant / Plaintiff Marc Randazza has NO Trademark or exclusive right to use the word "Randazza" or Marc Randazza. "Randazza's name" does NOT function as a Trademark anymore then I can say no one can use the name Crystal Cox in the reporting of my case or their opinion of my case. It is not a Trademark violation to report on Marc Randazza.

Counter Defendant / Plaintiff Marc Randazza says, "Cox registered the Infringing Domain Names with the intent to capitalize on the use of Plaintiff Randazza's personal name, extort money from Plaintiffs, and engage witness intimidation. (Exhibit H; Blog post asking for \$5 million for sale of <marcrandazza.me>, attached as Exhibit M; ECF #12-4 video from Cox admitting witness intimidation, a relevant transcript of which is attached as Exhibit N). In fact, the profit in Ms. Cox's endeavor flows directly from her extortion scheme."

I Counter Plaintiff / Defendant Crystal Cox, Object to that statement. I joked about \$5 Million just after I bought MarcRandazza.me, I titled the post here Kitty Kitty, it was a Parody. I had just bought it for 10 Dollars, there was no blog on it or value in it. Counter Defendant / Plaintiff Marc Randazza is trying to make it look like I offered the name for that real price, and that is not True. However, people buy and sell domain names every day, and can buy and sell LEGALLY for whatever price they want. Even if their is a possible Trademark. Godaddy has thousands of domain names on auction sites that have other peoples names or possible trademark names in them, they sell them all the time. It is not illegal nor has it cause and harm to the Plaintiff.

No Domain Names were EVER bought to tamper with a witness, they were purchased to report on a story, period.

For More Detailed Information on these Objections, and Reasons why Please See Memorandum to Defendant Crystal Cox's OBJECTION to Plaintiff's MOTION FOR SUMMARY JUDGMENT, submitted to this court with this Objection to Plaintiff's MOTION FOR SUMMARY JUDGMENT.

I Counter Plaintiff / Defendant Crystal Cox, have never had an Extortion scheme nor have I ever taken in ANY money they could possible be mistook as Extortion. If Counter Defendant / Plaintiff Marc Randazza really believes this and has convinced this court I am guilty of Extortion then why not file Criminal Charges, give me an Criminal Attorney and due process under law, BEFORE publishing widely that I, Counter Plaintiff / Defendant Crystal Cox and Eliot Bernstein are Guilt of Extortion, as if already convicted. And then Using this Court to further that false defamatory statement as fact, when it is not fact.

"On December 10, 2011, Crystal Cox registered <marcrandazza.com> in the publicly available Whois information. (See Exhibit K). On January 16, 2012, Cox sent an email to Plaintiff stating that she had purchased his personal name as a domain name. (See Exhibit H). She then asked Plaintiff to purchase her "reputation management services" in an attempt to extort money from Plaintiff. (See Exhibit H). This is her modus operandi. See Obsidian Finance Group, LLC v. Cox, 2012 WL 1065484 (D. Ore 2012)."

This statement is not true. The New York Times was already defaming me, and there was no way I would have sent anything that would have even remotely have suggested extortion. I asked Marc Randazza for a Job, plain and simply. I had the dotcom at issue when he was my attorney, to report on my own story. He said he did not want to hire me then he proceeded to act and defame me so I used the name to report on him, expose him and warn the public at large, as a Public Service.

Counter Defendant / Plaintiff Marc Randazza offered to buy the domain name from me and from Monica Foster, we both said no. I told him I would not sell for any price, this is NOT extortion. Plaintiff then launched into a year long and continued retaliation. Counter Defendant / Plaintiff Marc Randazza also asked me what I wanted from him, email records prove that. Plaintiff said that I made my point, if I was an extortionist I would have demanded money, I rejected his offers, Plaintiff Retaliated over and over.

Counter Defendant / Plaintiff Marc Randazza says, "Defendant Cox will not stop until she is satisfied that she has successfully intimidated Plaintiff or until he pays the requested ransom.". I, Counter Plaintiff / Defendant Crystal Cox, OBJECT to this, I never offered an ransom request, this is fraud on the courts. Also why would I, over any other reporter, have to be singled out to stop reporting on, having an opinion on, or making fun of Marc Randazza?

This violated my constitutional and civil rights.

For More Detailed Information on these Objections, and Reasons why Please See Memorandum to Defendant Crystal Cox's OBJECTION to Plaintiff's MOTION FOR SUMMARY JUDGMENT, submitted to this court with this Objection to Plaintiff's MOTION FOR SUMMARY JUDGMENT.

Counter Plaintiff / Defendant Crystal Cox NEVER had "bad faith" intend. My Intent is to report on and expose corruption in the United States Judicial System. I have been dedicated to this for over 7 years, at great personal cost. I have been fighting and exposing corruption and Counter Defendant / Plaintiff Marc Randazza has painted me to look like the criminal, when the truth is I am reporting on, exposing the crimes.

Regardless of the Defamatory Lies in publications by Counter Defendant / Plaintiff Marc Randazza and Counter Defendants, Investigative Blogger Counter Plaintiff / Defendant Crystal's purpose was ALWAYS, SOLELY to expose corruption, parody corruption, provide "speech critical" of those I alleged participated in these corrupt activities and to try and make the world a better place doing what I could to help give justice to victims of corruption.

Counter Defendant / Plaintiff Marc Randazza has no trademark on the name Marc Randazza and has no right to MarcRandazza.com or any of the Domain Names he stole from Counter Plaintiff / Defendant Crystal Cox

Counter Defendant / Plaintiff Marc Randazza is not entitled to a Summary Judgement as his allegations are all FALSE and Defamatory.

For More Detailed Information on these Objections, and Reasons why Please See Memorandum to Defendant Crystal Cox's OBJECTION to Plaintiff's MOTION FOR SUMMARY JUDGMENT, submitted to this court with this Objection to Plaintiff's MOTION FOR SUMMARY JUDGMENT.

Marco Randazza is the Plaintiffs "Handle", "Persona" Online, NOT Marc Randazza.

It is unlawful and unconstitutional to ban an investigative blogger, a journalist from writing a last name on her online media. Marc Randazza, is not the only Marc Randazza in the world, nor does he have an exclusive right on the use of "Randazza"

There are many people with that last name. Plaintiff has no right to exclude ANY blogger, journalist, to not use his name or last name. That would be like me saying no one can utter can't the last name Cox on anything ever. It is ridiculous, and unconstitutional, as well as selective prosecution.

For More Detailed Information on these Objections, and Reasons why Please See Memorandum to Defendant Crystal Cox's OBJECTION to Plaintiff's MOTION FOR SUMMARY JUDGMENT, submitted to this court with this Objection to Plaintiff's MOTION FOR SUMMARY JUDGMENT.

Plaintiff Marc Randazza has no Trademark on the name "Marc Randazza".

Plaintiff Marc Randazza uses the Trade Name, Marco Randazza as his Twitter and YouTube User Name, as well as his username on his own blog, and many other forums, blogs, news sites and social networks, NOT Marc but MARCO, .

Plaintiff Marc Randazza uses the Trade Name, Marco Randazza on Best Tweets, in Penn. News Articles, on Flickr, in Gloucester Times, on multiple YouTube accounts, on the Legal Satyricon as his username on his own blog, on the DNF forum, on yFrog, and many other sites and sources.

Plaintiff Marc Randazza had / has no TM posted at his blog regarding the name Marc Randazza as being trademarked and Plaintiff Attorney Marc Randazza had no Trademark when Defendant Crystal L. Cox purchased MarcRandazza.com to use as PR for Defendant Crystal Cox's highly public First Amendment Case, that will set a precedence that is a "Game Changer" for ALL New Media, Bloggers, and Citizen Journalist.

Defendant Crystal L. Cox "actions" as Plaintiff calls it, were a "legitimate purpose" and that purpose was originally to provide PR for her own court case of which Plaintiff Marc Randazza was, at that time to be her attorney and acted on her behalf in negotiations with Opposing Counsel, David S. Aman of Tonkon Torp Law Firm. Obsidian Finance Group vs. Crystal Cox is the biggest Free Speech case any one, independent blogger has ever seen, Obsidian V. Cox. Which is the only case of it's kind to distinguish the rights of bloggers vs. the rights of traditional media. Obsidian V. Cox will hopefully end the "Monopoly on Free Speech" in which according to Plaintiff Marc Randazza to Defendant Crystal Cox that "Big Media" told him, they make more money with a Monopoly on Free Speech.

Counter Defendant / Plaintiff Marc Randazza is not entitled to a Summary Judgement as his allegations are all FALSE and Defamatory.

There never was an Extortion Scheme. Counter Defendant / Plaintiff Marc Randazza has simply used his money, power and influence to ruin the life of and bankrupt a female blogger who he did not agree with.

I, Counter Plaintiff / Defendant Crystal Cox OBJECT to Plaintiff's Motion for Summary Judgement in it's Entirety.

For More Detailed Information on these Objections, and Reasons why Please See Memorandum to Defendant Crystal Cox's OBJECTION to Plaintiff's MOTION FOR SUMMARY JUDGMENT, submitted to this court with this Objection to Plaintiff's MOTION FOR SUMMARY JUDGMENT.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed using this Court's CM/ECF system
On February 17th 2013.

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