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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,)	RESPONSE IN OPPOSITION TO
)	DEFENDANT COX'S MOTION FOR
Plaintiffs,)	SANCTIONS (ECF 77)
)	
vs.)	
)	
CRYSTAL COX, an individual, and ELIOT)	
BERNSTEIN, an individual,)	
)	
Defendants.)	

Plaintiffs Marc J. Randazza, Jennifer Randazza, and Natalia Randazza, through counsel, hereby submit this Opposition to Defendant Cox's Motion for Sanctions (ECF 77).

The latest motion by Ms. Cox is as unintelligible and provides no rational basis for levying sanctions. Plaintiffs take the position that her motion does not even require a response. However, to the extent that it could be interpreted as a proper Motion seeking any kind of relief that this Court could grant, it is opposed.

As a preliminary matter, this is styled as a discovery Motion, yet it was filed without the necessary meet and confer as required under Federal Rule of Civil Procedure 26(f) and Local Rule

26-1.¹ For this reason alone, and without any need to further multiply the amount of filings in this case, the motion is ripe for denial and should be stricken.

Furthermore, since Cox has file a Motion for Summary Judgment (ECF 79) she concedes that she requires no discovery in this matter.

Finally, the instant Motion serves to provide additional grounds for the Court to address Cox's repeated abuse of the ECF system granting Plaintiffs' motion to revoke Cox's ECF privileges (ECF 69).

Dated: February 19, 2013

Respectfully submitted,

/s/Ronald D. Green

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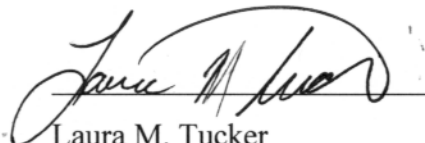
¹ Defendant Cox has thus far refused to respond to two requests to confer with Plaintiffs' Counsel regarding discovery. (See Correspondence with Cox, attached as Exhibit A) In fact, Cox cited these attempts to set up a telephone conference with her in her Motion for a Protective Order. (ECF 47 at 3, "Ronald D. Green, Randazza Legal Group insists on a phone conference, a meeting regarding 'discovery.'"") In her Motion for Protective Order, Cox stated that she "refuses to allow him [Plaintiffs' Counsel] access to her in ANY way," reasoning that Plaintiffs' Counsel would "harm, intimidate, harass, taunt, physically harm and possibly KILL" her if such a telephone meeting were arranged. (ECF 47 at 3)

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 February 19, 2013.

Dated: February 19, 2013

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Laura M. Tucker', is written over a horizontal line.

Laura M. Tucker

Law Clerk

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