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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-GMN-PAL
JENNIFER RANDAZZA, an individual, and	)	
NATALIA RANDAZZA, a minor,	)	<b>RESPONSE TO DEFENDANT</b>
	)	<b>CRYSTAL COX'S MOTION REQUEST</b>
Plaintiffs,	)	<b>FOR ADMISSIONS, ANSWERS</b>
	)	
vs.	)	
	)	
CRYSTAL COX, an individual, and ELIOT	)	
BERNSTEIN, an individual,	)	
	)	
Defendants.	)	

Plaintiffs Marc J. Randazza, Jennifer Randazza, and Natalia Randazza, through counsel, hereby submit their Opposition to Defendant Crystal Cox's "Motion Request for Admissions, Answers."

Defendant Cox's Motion is not proper and does not make a request for which this Court can grant relief. Thus, it should be stricken and denied. Requests for admissions are to be sent directly to the opposing party, not to the Court. Fed. R. Civ. P. 36(a). Such discovery requests are sent only after the parties have met and conferred on a stipulated discovery plan, which Defendant Cox has thus far refused to agree to do.

Defendant Cox has refused to respond to two requests to confer with Plaintiffs' Counsel regarding discovery pursuant to Rule 26(f) of the Federal Rules of Civil Procedure. (See

1 Correspondence to Cox, attached as Exhibit A) In fact, Cox cited these attempts to set up a  
2 telephone conference with her in her Motion for a Protective Order. (ECF 47 at 3, “Ronald D.  
3 Green, Randazza Legal Group insists on a phone conference, a meeting regarding ‘discovery.’”) In  
4 her Motion for Protective Order, Cox stated that she “refuses to allow him [Plaintiffs’ Counsel]  
5 access to her in ANY way,” reasoning that Plaintiffs’ Counsel would “harm, intimidate, harass,  
6 taunt, physically harm and possibly KILL” her if such a telephone meeting were arranged. (ECF 47  
7 at 3) Plaintiffs’ Counsel intended no such thing and was merely attempting to satisfy his  
8 obligations to this Court and to his clients pursuant to the Federal Rules of Civil Procedure.

9 Because Cox’s Motion Request for Admissions, Answers does not request any relief this  
10 Court can grant, Plaintiffs respectfully request this Court deny Defendant’s Motion Request for  
11 Admission, Answers. (ECF 78).

12  
13 Dated: February 20, 2013

Respectfully submitted,

14 /s/Ronald D. Green

15 Ronald D. Green, NV Bar #7360

16 Randazza Legal Group

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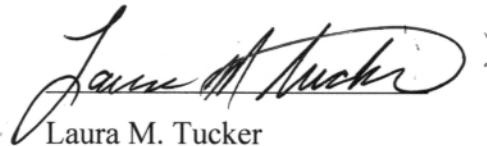
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**CERTIFICATE OF SERVICE**

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 20, 2013.

Dated: February 20, 2013

Respectfully Submitted,



Laura M. Tucker  
Law Clerk  
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