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

MARC J. RANDAZZA,
Plaintiff

v.

Crystal L. Cox

**Objection to Motion to Extend Time to Respond
AND Notice**

Defendant Crystal Cox objects to Motion to Extend Time to Respond to Counterclaim

Randazza now claims this case is about extortion at its “core”. In the motion for summary judgment Plaintiff claimed the case was about Cox defaming Randazza. Yet the cause of action is trademark.

Defendant Cox has never engaged in extortion. Cox has never offered to remove / retract anything on her blogs, websites or other social media for a fee or payment of any kind.

Yes, as Randazza claims in this motion, this court did find Cox guilty of extortion. Randazza cited his own comments from his WIPO complaint and Randazza Legal Group attorney Jordan Rushie’s blog as proof or some kind of evidence that Cox was guilty of extortion and Judge Navarro simply took Randazza’s word for it as did WIPO, in complete violation of Cox’s rights and with no First Amendment Adjudication what so ever.

Judge Navarro then allowed Randazza to take the domain names, blogs, etc and change the server whereby Randazza redirected massive, top of the search engine links, build by Cox’s hard work, and redirected this to one blog post on Marc Randazza’s legal blog defaming, slandering and inciting hate against Cox. This was over 14 months ago. And has caused Cox massive, irreparable damage and suffering.

Judges, Attorneys, Big and small media across the world have taken up the words of Attorneys Kevin Padrick, David Aman and Marc Randazza and made them facts, and evidence used against Cox to convict her in judicial opinions and media of extortion, though Cox has never had due process for the crime of extortion.

This court has the power to insist that Randazza obey the law, and Cox moves this court, with respect, to do so.

Cox moves this court to demand that Randazza cease and desist from accusation that Cox extorted him. And if not to file a criminal complaint and give Cox a criminal attorney allowing Cox due process in this matter.

Cox has never made extortionate demands on Randazza nor anyone else. Cox has been painted in false light in order to discredit her blogs exposing corruption.

Cox's "litigation" is not a way to "extort" Randazza as this motion claims. Cox is merely fighting back and has been, the best she can for 16 months.

Randazza claims to wish to conserve Judicial resources yet he has taken up massive court time in this court, in the ninth circuit and in Florida state court, to attempt to set Cox up for and accuse Cox of extortion on federal and state court dockets.

Randazza claims to wish to conserve Judicial resources yet he took away Cox's right to file electronically and refuse to email Cox documents.

This very lawsuit is a SLAPP suit designed to intimidate an investigative reporter and is a waste of Judicial resources.

On page 4 line 17, of the Motion to Extend time Randazza claims, that Defendant Cox refuse to participate and refuses mail. However, Randazza knows Cox's home address through illegally forcing her church to divulge private information and Cox has the same mailbox she has had since before this litigation started.

Cox moves this court to, somehow, stop Randazza's aggressive, unlawful, meritless, and unconstitutional behavior.

Eliot Bernstein was never a Proxy for Cox. Cox never targeted a child. Cox never capitalized on the Randazza's alleged good name. Randazza is a high profile Porn attorney, connected to pedophiles and organized crime in Porn, why would Cox try and capitalize on his already tainted "name". Cox was always trying to expose Randazza's tactics as a lawyer and Randazza Legal Group as a law firm, whom represented her, tricked her, deceived her and conspired with David Aman, Attorney for the Plaintiff in Obsidian v. Cox and countless others to destroy his former client, and with privileged information.

Certification of Service

On March 10th 2014, Counter Plaintiff Crystal Cox certifies mailing a copy of this response to

U.S. District Court
Clerk of Court
Room 1334
333 Las Vegas Blvd. S.
Las Vegas , NV 89101

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