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 /

Civil Action, Case 2:12-cv-02040-GMN-PAL
Counter Complaint
Demand for Jury Trial

v.

Defendant Crystal Cox and Defendant Eliot Bernstein

Civil Action, Case 2:12-cv-02040-GMN-PAL Counter Complaint Demand for Jury Trial

1.) Criminal and Civil Conspiracy

2.) Defamation

3.) Harassment

4.) Violation of Anti-Trust Violations / Fair Trade Violations Fair Competition Act (FCA), The Sherman Antitrust Act (1890), Antitrust Policy and Competition Law

5.) Violation of First Amendment, Constitutional Rights

6.) Violation of Due Process /Denial of Due Process

7.) Violation of Hate Crime Act

8.) Abuse of Process

9.) Tortious Interference

10.) Interference with Counter Plaintiff's Prospective Business Advantage

COUNTERCLAIM

Comes now the Defendant Crystal Cox against Plaintiff Marc Randazza / Hereafter Counter Defendant Marc Randazza and Counter Plaintiff Crystal Cox with this Counterclaim, naming the Following Counter Defendants:

Pro Se Counter Plaintiff Crystal Cox's Counter-Complaint Against Plaintiff Marc Randazza and "Parties". Pro Se Counter Plaintiff Crystal Cox states the following on information and belief.

Parties, Jurisdiction, Counter Defendants and Venue

Counter Defendants Named in this Counter Complaint / Legal Action

Counter Plaintiff Crystal Cox requests this court to Serve, Provide Service to the Following Defendant List. Counter Plaintiff Crystal Cox cannot afford, unable to provide service of documents to Counter Defendants and this case is an important Public Issue and Public Concern. (pauper in *papus*)

Counter Defendants Named in this Counter Complaint / Legal Action are as Follows.

Ronald Green, Randazza Legal Group, Marc J. Randazza, Nevada Individuals, Nevada, Florida, Arizona Company.

Kenneth P. White, White, White and Newhouse, California Individual and California Business

Kashmir Hill of Forbes, Washinton D.C

Godaddy Inc., Bob Parsons, Jessica Griffin Godaddy, Arizona Individual, Arizona Business

Tonkon Torp Law Firm, David S. Aman, Michael Morgan, Steven Wilker, Oregon Resident, Oregon Business

Proskauer Rose Law Firm, Kenneth Rubenstein, Allen Fagin, Gregg Mashberg, Jenifer DeWolf Paine, Joseph Lecesse, New York Individuals, New York Business

Obsidian Finance Group, David W. Brown, Kevin D. Padrick, Oregon Individual, Oregon, Washington Corporation.

WIPO, Francis Gurry, Erik Wilbers, Switzerland - Peter L. Michaelson, New Jersey Individual

New York Times, David Carr, New York Individual, New York Business

Philly Law Blog, Jordan Rushie, Leo M. Mulvihill, Jr., Mulvihill & Rushie, LLC, Philadelphia Business, Philadelphia Individual, Greenberg Traurig Law Firm

SaltyDroid, Jason Jones Esq.,

Janine Robben Oregon State Bar Bulletin

Liberty Media Holdings, John C. Malone, Corbin Fisher, Manwin,

NPR, Bob Garfield, New York Public Radio, New York

Tracy L. Coenen of SequenceInc.com, Wisconsin

Mark Bennett blog.bennettandbennett.com, Bennett and Bennett,

Scott H. Greenfield, Carlos Miller, John Calkins Sony, California

Eric Turkewitz - Turkewitz Law Firm and NewYorkPersonalInjuryAttorneyBlog.com, Scott H. Greenfield of Simple Justice - a New York Criminal Defense Blog and blog.simplejustice.us, New York Business, New York Individual

Carlos Miller of PixlQ.com and PhotographyisNotaCrime.com,

Roxanne Grinage, HireLyrics, Philadelphia Business, Philadelphia Individual

Sean Boushie, University of Montana, Royce Engstrom, Bernie Cassidy, Taylor Kai Groenke (Kai Groenke), Montana Individual, Montana Business

Martin Cain, Dylan Energy, Maryland Individual, Maryland Business

APPLE, Steve Dowling, Bruce Sewell, California, Doug Chey, Douglas D. Chey, California

Tim Vawter, The Protection Group Video

Judge Gloria M. Navarro personally and Professionally, Nevada

John and Jane Doe Counter-Defendants, Individuals and Companies,

ALLEGATIONS COMMON TO ALL COUNTS
"On Belief and Knowledge of" As Follows.

GENERAL ALLEGATIONS

In 2011 Counter Plaintiff Crystal Cox was involved in a major free speech lawsuit. (Obsidian Finance Group LLC v. Crystal Cox) Counter Plaintiff Crystal Cox lost this case due to Judge Marco Hernandez ruling that the Oregon Retraction Laws,Shield Laws, and the First Amendment did not apply to bloggers but only applies to accredited media, big media.

Counter-Defendant Marc Randazza saw the Obsidian V. Cox ruling in December of 2011. Counter-Defendant Marc Randazza, as he told me in his first call, was contacted by his clients, that are high up in the Porn Industry. Counter-Defendant Marc Randazza told Counter Plaintiff Crystal Cox that these Porn Industry giants called him and asked him what he is going to to about Crystal Cox, and this bad precedence set by Obsidian Finance Group LLC v. Crystal Cox. A precedence that affects the bottom line financially of the free speech coalition and all the porn companies that Counter-Defendant Marc Randazza represents.

At this time, one of my investigative reporters / investigative bloggers for my Whistleblower Media News Network, Michael Spreadbury ,contacted Counter-Defendant Marc Randazza and asked if he would take a meeting with "US", the 3 of us had a conference call in December 2011 regarding Counter Plaintiff Crystal Cox and my Ninth Circuit Appeal. On this first phone call, Counter-Defendant Marc Randazza discouraged Counter Plaintiff Crystal Cox from filing a Ninth Circuit Appeal. However, Counter-Defendant Marc Randazza asked for the strategy of Counter Plaintiff Crystal Cox and for all Counter Plaintiff Crystal Cox's files.

Counter-Defendant Marc Randazza was out to sabotage Counter Plaintiff Crystal Cox's Ninth Circuit Appeal from, even before the very first phone call, where Counter-Defendant Marc Randazza gathered information, strategy, files and privileged information from Counter Plaintiff Crystal Cox in which Counter-Defendant Marc Randazza later used with co-conspirators to defame, harass, paint in false light, ruin the business of, intimidate, and put Counter Plaintiff Crystal Cox under extreme duress with the goal of stopping Counter Plaintiff Crystal Cox's Ninth Circuit Appeal in Obsidian Finance Group v. Crystal Cox, so that his "Clients" would not be affected by this precedence.

Counter-Defendant Marc Randazza told Counter Plaintiff Crystal Cox that he may have a conflict of interest with his representation of the Media Bloggers Association (MBA), and he would let Counter Plaintiff Crystal Cox know if he did, that never happened.

After this first call, Counter-Defendant Marc Randazza did not let Counter Plaintiff Crystal Cox know of any conflicts of interest as Counter-Defendant Marc Randazza told Counter Plaintiff Crystal Cox that he would. In the meantime UCLA Law Professor, Attorney Eugene Volokh was corresponding with Counter Plaintiff Crystal Cox on possible representation in Counter Plaintiff Crystal Cox's Ninth Circuit Appeal.

Professor, Attorney Eugene Volokh was professional, to the point and did not tell Counter Plaintiff Crystal Cox that she made a mess, did not put me down, treat me badly and was focused on the merits of the case in which affected all Citizen Journalists, All Free Speech, First Amendment Rights, Whistleblowers and the constitutional rights of all citizens, which was always the primary goal of Counter Plaintiff Crystal Cox. And unlike Counter-Defendant Marc Randazza, which, as a client and a court case defendant involved with Attorney Marc Randazza, I, Counter Plaintiff Crystal Cox have every legal right to have as many blogs as I like expressing my opinion of Attorney Marc Randazza, Counter Plaintiff Marc Randazza. Counter Plaintiff Crystal Cox was a VERY dissatisfied, and even HARMED ex-client of Counter Plaintiff Marc Randazza and has the legal right to share her experience, review him as an attorney, and exercise her right to FREE SPEECH.

Still not hearing from, Counter-Defendant Marc Randazza, Counter Plaintiff Crystal Cox received emails and had a phone meeting with Attorney Eugene Volokh whereby Attorney Eugene Volokh told Counter Plaintiff Crystal Cox that Counter-Defendant Marc Randazza was acting on my behalf, putting in time and effort, negotiating with Counter Plaintiff David Aman and Counter Plaintiff Kevin D. Padrick, and Attorney Eugene Volokh told Counter Plaintiff Crystal Cox that if she had chose to go with Counter-Defendant Marc Randazza for the Ninth Circuit Appeal, then he would assist Counter-Defendant Marc Randazza in any way he could in order to assist me.

I, Counter Plaintiff Crystal Cox, was very alarmed to hear that Counter-Defendant Marc Randazza was negotiating a deal on my behalf with Counter Plaintiff David Aman and Counter Plaintiff Kevin D. Padrick, without my knowledge of the terms of this deal, and without the promised information regarding any conflicts of interest that Counter-Defendant Marc Randazza may have in moving forward with my case.

Counter-Defendant Marc Randazza was acting as my attorney with my privileged information and negotiating a deal on my alleged behalf, without my knowledge. This upset me, Counter Plaintiff Crystal Cox, and rightly so. I told UCLA Law Professor, Attorney Eugene Volokh that I did not want Counter-Defendant Marc Randazza to represent my on my Ninth Circuit Appeal, and that I would let Counter-Defendant Marc Randazza know immediately that he no longer represented me.

I, Counter Plaintiff Crystal Cox, then emailed Counter-Defendant Marc Randazza and copied the email to UCLA Law Professor, Attorney Eugene Volokh and told Counter-Defendant Marc Randazza that he no longer represented me, Counter Plaintiff Crystal Cox, and the reasons why.

Counter-Defendant Marc Randazza acted as if he was fine with this decision, as the record shows. However, Counter Plaintiff Crystal Cox firing Counter-Defendant Marc Randazza ruined his plan to sabotage Counter Plaintiff Crystal Cox's Ninth Circuit Appeal so that his Big Clients, and Co-Conspirator Attorneys, Bloggers and Big Media would not be affected by the precedence set by Counter Plaintiff Crystal Cox in Obsidian Finance Group vs. Crystal Cox. So Counter-Defendant Marc Randazza launched new efforts to sabotage Counter Plaintiff Crystal Cox's Ninth Circuit Appeal and enlisted a large amount of conspirators to defame, harass, and intimidate Counter Plaintiff Crystal Cox into stopping, my Ninth Circuit Appeal. Co-Counter Defendant David Aman offered me 3 Settlements via UCLA Law Professor, Attorney Eugene Volokh after the Trial was over. 2 of Which were after Counter Plaintiff Crystal Cox had filed her Ninth Circuit Appeal in effort to STOP the Appeal. Counter-Defendant Marc Randazza has worked in conspiracy with a ring of bloggers, most who are attorneys and worked with Counter Defendant Kashmir Hill of Forbes and Counter Defendant Bob Garfield of NPA, Counter Defendant WIPO, Counter Defendant Peter L. Michaelson and other co-conspirators in order to create a mass media illusion that Counter Plaintiff Crystal Cox is guilty of the crime of extortion, though Counter Plaintiff Crystal Cox was not on trial for extortion, not under investigation for extortion nor had ever been charged with extortion.

Counter-Defendant Marc Randazza and Counter Defendant David Aman, along with massive co-conspirators have set out to paint Counter Plaintiff Crystal Cox in false light in order to affect Counter Plaintiff Crystal Cox's Ninth Circuit Appeal, and to stop this alleged "bad precedence" at the lower court level so that Counter-Defendant Marc Randazza's biggest Porn Industry Clients such as Counter Defendant Liberty Media Holdings, Counter Defendant John C. Malone, Counter Defendant Manwin, Counter Defendant Corbin Fisher and other big clients, John and Jane Doe counter defendants / co-conspirators of Marc Randazza's would not be affected by the Obsidian V. Cox Precedence.

These Co-Conspirators, Counter Defendants were not simply worried just about this “bad precedence” to their Free Speech Rights, and legal proceedings that would affect them in the future.

Counter Defendant Liberty Media Holdings, Counter Defendant John C. Malone, Counter Defendant Manwin, Counter Defendant Corbin Fisher and other big clients, counter defendants / co-conspirators of Marc Randazza’s named in this counter complaint, as well as John and Jane Doe Counter Defendants, absolutely need to silence the blogs of Investigative Blogger Counter Plaintiff Crystal Cox. To them, it is a matter of Trillions of Dollar and Indictments they may face.

Over a Decade ago iViewit Technology invented a video coding technology that changed pixelated video to clear crisp video. These counter defendants / co-conspirators of Counter Defendant Marc Randazza’s make billions a year off of this technology they infringe on, each one of them, and they have for over a decade. Counter Plaintiff Crystal Cox has reported on the iViewit Technology for over 3 years, and Counter Plaintiff Crystal Cox has reported on Counter Defendant Proskauer Rose, Counter Defendant Kenneth Rubenstein, MPEG LA, Counter Defendant John Calkins and most all of the co-conspirators listed in this counter complaint.

(On belief and knowledge) Counter Defendant Marc Randazza has been hired to STOP the investigative blogs of Counter Plaintiff Crystal Cox in order to suppress, discredit the iViewit Technology Theft Story, in order to save his clients and co-conspirators from indictments and from having to pay iViewit Technology and Inventor, Defendant Eliot Bernstein Trillion of Dollars. In this, these Counter Defendant / Co-Conspirators have committed massive shareholder fraud, been involved in insider trading, violated anti-trust laws, violated patenr laws, committed international crimes and conspiracy and more.

Defendant Eliot Bernstein is the founder of the iViewit Technology Company and one of the iViewit Technology Inventors. The Co-Conspirators in this complaint stand to lose Trillions of Dollars in the iViewit Technology Case and many face prison time. There are ongoing Federal and International Investigations in which name many of the Co-Conspirators / Counter Defendants. There are RICO Complaints, USPTO Complaints, Christine Anderson Whistleblower Case out of New York, Florida Bar Lawsuits and Complaints, European Patent Office Complaints, and other ongoing court cases and investigations.

Counter-Defendant Marc Randazza has criminally and civilly conspired with all co-defendants, individual and companies in this counter complaint, to the best of my knowledge, and upon my belief.

Why is Counter Plaintiff Crystal Cox Ninth Circuit Appeal so Important that Co-Conspirators would go to this length to STOP It?

Counter-Defendant Marc Randazza told Counter Plaintiff Crystal Cox that filing an Ninth Circuit Appeal in Obsidian V. Cox, would endanger the rights of fellow citizen bloggers, and free speech advocates and it may be best to leave the mess where I made it at the lower courts. Counter Plaintiff Crystal Cox later found out from ethical attorneys that this advice, counsel, was not in Counter Plaintiff Crystal Cox's best interest, nor in the best interest of fellow citizen bloggers, and free speech advocates.

Counter-Defendant Marc Randazza told Counter Plaintiff Crystal Cox, on their first phone call, that Big Media Makes More Money if they have a Monopoly on Free Speech. Counter-Defendant Marc Randazza also told Counter Plaintiff Crystal Cox, on their first phone call that there is no precedence in a higher court that distinguishes the rights free speech rights of bloggers vs. and in conjunction with the free speech laws and rights of traditional journalists and reporters. If Counter Plaintiff Crystal Cox were to win a Ninth Circuit Appeal this would level the playing field and give equal rights to bloggers and traditional journalist, media. Big Media stands to lose Billions monthly if Counter Plaintiff Crystal Cox were to win a Ninth Circuit Appeal and with this Counter Plaintiff Crystal Cox's media outlet, over a thousand blogs reporting on the iViewit Video Technology story, would get credibility and thereby expose thousands of named defendants, co-conspirators and counter defendants in a public arena.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Big Media, Counter Defendant David Carr and the New York Times, Counter Defendant Bob Garfield and Counter Defendant NPR, Counter Defendant Kashmir Hill Forbes and other co-conspirator in this counter complaint have massive motive to STOP the Counter Plaintiff Crystal Cox Ninth Circuit Appeal.

First Cause of Action

Criminal and Civil Conspiracy Against Counter Plaintiff Crystal Cox

Counter Plaintiff Crystal L. Cox re-alleges all of the preceding paragraphs

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter Defendants ALL, have maliciously conspired to tarnish the reputation of Counter Plaintiff Crystal Cox and Eliot Bernstein, and to remove blogs, information online in which expose the involvement of Liberty Media Holdings, Corbin Fisher, Manwin, John Calkins Sony, Kenneth Rubenstein, Peter L. Michaelson, Proskauer Rose Law Firm, Greenberg Traurig, and other John and Jane Doe's in the involvement of stealing the iViewit Technology, and infringement upon the iViewit Video Technology.

iViewit and it's associated Companies own the rights to most all of the videos technology used by John C. Malone, Liberty Media Holdings, Corbin Fisher, Manwin, Sony, and other John and Jane Doe individuals and companies.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter Defendant Greenberg Traurig Law Firm, Counter Defendant Randazza Legal Group, Counter Defendant Jordan Rushie of Mulvihill and Rushie LLC and Counter Defendant Marc J. Randazza are attorneys / law firms who represent John C. Malone, Liberty Media Holdings, Corbin Fisher and others who on belief and knowledge of Plaintiff Crystal Cox, all infringe on the iViewit Video Technology, where by (Defendant) Eliot Bernstein is one of the iViewit Video Technology Inventors and the founder of the iViewit Technology Company.

Greenberg Traurig Law Firm is a named defendant in the iViewit Technology RICO Complaints, Federal and International Investigations, USPTO Complaints, and other legal action in multiple courts and ongoing investigations regarding the biggest technology crime in the world, the Stealing of the 13 Trillion Dollar iViewit Technology.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, John C. Malone, Liberty Media Holding, Jordan Rushie, Mulvihill and Rushie LLC, Corbin Fisher, and other John and Jane Doe Defendants have criminally and civilly conspired with Counter Defendant Marc Randazza and Counter Defendant David Aman, in order to get unlawful, unconstitutional court actions against Counter Plaintiff Crystal Cox in order to silence information regarding those infringing on the iViewit Video Technology and owing iViewit Technology and Eliot Bernstein 100's of Billions of Dollars.

Tonkon Torp Law Firm was the Attorneys for Enron (named Defendant in iViewit Technology Case) During their bankruptcy. Enron went Bankrupt due to business deals with Proskauer Rose Law Firm named Defendant in iViewit Technology Case) Regarding the iViewit Technology.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Tonkon Torp Law Firm, David S. Aman, Jordan Rushie of Mulvihill and Rushie LLC Philly Law Blog, Brown White $ Newhouse, Kenneth P. White, Popehat.com, Eric Turkewitz - Turkewitz Law Firm and NewYorkPersonalInjuryAttorneyBlog.com, Scott H. Greenfield of Simple Justice - a New York Criminal Defense Blog, Mark Bennett blog.bennettandbennett.com, Bennett and Bennett, Scott H. Greenfield, Bob Garfield of NPR, David Carr of the New York Times, Kashmir Hill of Forbes and other John and Jane Doe Attorneys and Law Firms, in an online campaign to defame, discredit the blogs of Defendant Crystal Cox and to make her, me look like a Criminal. In order to suppress blogs exposing the iViewit Technology Story.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter Defendant Marc

Randazza, Counter Defendant Proskauer Rose, Counter Defendant WIPO, Counter Defendant Tonkon Torp, Counter Defendant David S. Aman, Counter Defendant Michael Morgan, Counter Defendant Peter L. Michaelson, Counter Defendant Allen Fagin, Counter Defendant Gregg Mashberg, Counter Defendant Kenneth Rubenstein, Counter Defendant Randazza Legal Group, Counter Defendant Godaddy Inc., Counter Defendant Bob Parsons, Counter Defendant Jessica Griffin GoDaddy criminally and civilly conspired to steal intellectual property of Counter Plaintiff Crystal Cox, suppress information on the blogs of Counter Plaintiff Crystal Cox, intimidate and defame Counter Plaintiff Crystal Cox, harass and threaten Counter Plaintiff Crystal Cox, ruin the career and business of Counter Plaintiff Crystal Cox, discredit the iViewit Technology story being reported by Counter Plaintiff Crystal Cox for 3 years, to interfere with Counter Plaintiff Crystal Cox's Ninth Circuit Appeal to Stop a Precedence that is lose lose for clients of Counter Defendant Marc Randazza, should Obsidian V. Cox go through the Ninth Circuit Court of Appeals.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza Criminally and Civilly Conspired with Counter-Defendant GoDaddy, Counter-Defendant Peter L. Michaelson, Counter-Defendant WIPO, and Counter-Defendant Judge Gloria M. Navarro to seize Counter-Plaintiff Crystal Cox and (Defendant) Eliot Bernstein's Domain Names and then allowed Counter-Defendant Marc Randazza in conspiracy to link those domain names to a blog post doing what Counter-Defendant Marc Randazza is accusing Counter-Plaintiff Crystal Cox and Defendant Eliot Bernstein of doing. Counter-Defendant Marc Randazza has linked seized domain names to a blog post in which links to stories, articles, blog posts written by his co-conspirators in effort to defame, harass, intimidate, criminally endanger, and silence Investigative Blogger Crystal Cox. Here is that Blog Post:

""This Domain Name Seized from Crystal Cox

A number of domain names, formerly registered to the known cyber-extortionist, Crystal Cox, now forward to this post.

On Nov. 30., the World Intellectual Property Organization awarded six of them to me in **Randazza v. Cox**, WIPO Case No. D2012-1525. (Cox's commentary on the case is here)

On Dec. 14, the United States District Court in Las Vegas issued a TRO seizing the rest. See **Randazza v. Cox,** 2:12-cv-02040 (D. Nev. Dec. 14, 2012)

I prefer not to comment much on the cases themselves, as there has been plenty of that from third party media sources. However, I have put up this post so that any of the seized domain names can point to this post. If you represent any of Cox's other victims, feel free to email me and I'll be pleased to share my pleadings in these cases.

Here are some selected press accounts of the story:

Forbes: Hill, Kashmir, "Ugly New Reputation-Smearing Tactic: Going After a Toddler's Internet Footprint" Forbes.com, April 2, 2012.

New York Times: Carr, David, "When Truth Survives Free Speech" New York Times, Dec. 11, 2011.

Philly Law Blog: Rushie, Jordan, "The Evolution of Crystal Cox: Anatomy of a Scammer" Philly Law Blog, April 3, 2012.

Forbes: Coursey, David. "Are Bloggers Really Journalists? Not If They Ask for Money" Forbes.com, March 29, 2012.

Forbes: Hill, Kashmir. "Why An Investment Firm Was Awarded $2.5 Million After Being Defamed By Blogger" Forbes.com, Dec. 7, 2011.

PopeHat: White, Ken. "Crystal Cox: Not a Free Speech Advocate" Popehat, April 4, 2012.

National Public Radio: Garfield, Bob. "Combating 'Bad' Speech with More Speech" NPR, On the Media Episode on April 6, 2012.

Photography is Not a Crime: Miller, Carlos. "Blogger Must Act Like Journalist To Be Treated Like One" Pixiq, December 9, 2011.
I expect even more loony tunes to follow."

Counter Defendant Marc Randazza's Blog "The Legal Satyricon" Blog Post, Seized Domains Now Link to, BEFORE Counter-Plaintiff Crystal Cox and Defendant Eliot Bernstein was allowed due process of law.

Counter-Plaintiff Crystal Cox had thousands of linking blog posts, and Counter-Defendant Marc Randazza has Criminally and Civilly conspired with Counter-Defendant Godaddy Inc, and the Nevada Courts to wipe out this content, these links, in an unethical, illegal TRO. Godaddy Inc. is financially liable to Counter-Plaintiff Crystal Cox, as is Counter-Defendant Marc Randazza and Counter-Defendant Judge Gloria M. Navarro professionally and personally.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza has Criminally and Civilly conspired with Counter-Defendant Godaddy Inc. and Counter-Defendant Bob Parsons Godaddy President to tie up domain names for Counter-Defendant Marc Randazza in a way that violates the legal and constitutional rights of Counter-Plaintiff Crystal Cox and Defendant Eliot Bernstein.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza has Criminally and Civilly conspired with Counter-Defendant Godaddy Inc. and Bob Parsons Godaddy President to suppress blogs of Counter-Plaintiff Crystal Cox in order to cover up Godaddy's infringement of the iViewit Technology. And to Criminally and Civilly conspire with Counter-Defendant WIPO, Counter-Defendant Sony, Warner Bros., APPLE, MPEG LA, Baryn Futa, Alexis Devane, Counter-Defendant Peter L. Michaelson, Tonkon Counter-Defendant Torp Law Firm, Counter-Defendant Manwin, Counter-Defendant Corbin Fisher and John and Jane Does who owe Defendant Eliot Bernstein and iViewit Technology Billions of Dollars.

In the Summer of 2011 Counter Defendant Proskauer Rose Law Firm attempted to Seize Domain Names from Counter Plaintiff Crystal Cox in Order to order to silence blogs exposing the iVieiwt Technology theft of which Proskauer Rose Patent Attorneys we involved. Counter Defendant Proskauer Rose Law Firm filed a WIPO Complaint to attempt to take Counter Plaintiff Crystal Cox's domain names. The WIPO Complaint accused Counter-Plaintiff Crystal Cox of "Parroting Eliot Bernstein" and attempted to completely discredit the iViewit Technology theft Story and the involvement of Proskauer Rose Patent Attorneys in the stealing of the iViewit Technology.

The Domain Names involved in this Dispute were AllenFagin.com, JosephLeccese.com, GreggMashberg.com and ProskauerLawFirm.com - WIPO Case Numbers (TG) D2011-0678, (CT) D2011-0679,(CT) D2011-0677, (CT) D2011-0675 (Complainant Proskauer Rose).

Counter Defendant Proskauer Rose Law Firm, at that time requested that Counter

Defendant Peter L. Michaelson be a Panelist on the WIPO Panel. There were 3 WIPO Panelists on that WIPO Case, Peter L. Michaelson recused himself before the Panel was set , assuming, due to conflicts of interest with Counter Defendant Kenneth Rubenstein Proskauer Patent Attorney originally involved in the iViewit Technology theft and connections with AT&T Bell Labs, MPEG LA, and Hon. Judith Kaye.

Counter-Plaintiff Crystal Cox won all 4 WIPO cases against Counter Defendant Proskauer Rose.

When Counter Defendant Proskauer Rose could not remove the Investigative Blogs of Crystal L. Cox exposing the iViewit Technology theft and the involvement of Counter Defendant Proskauer Rose attorneys, Proskauer Rose then criminally and civilly conspired with Counter Defendant Peter L. Michaelson, WIPO, in order to control the WIPO Decision regarding Counter Defendant Marc Randazza Vs. Crystal Cox and Eliot Bernstein.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter Defendant Proskauer Rose then enlisted, conspired criminally and civilly with Counter-Defendant Marc Randazza to set a precedence in a court decision to later be used by Counter Defendant Proskauer Rose to seize thousands of blogs and hundreds of thousands of blog posts exposing Proskauer Rose involved in the stealing of a 13 Trillion Dollar Technology, the iViewit Technology. Counter Defendant Proskauer Rose conspired criminally and civilly with Counter-Defendant Marc Randazza to use this ill gotten court decision as a basis for future claims against thousands of Counter-Plaintiff Crystal Cox's blogs and the Blogs of Defendant Eliot Bernstein, iViewit Technologies.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, When Counter-Defendant Proskauer Rose Failed at Silencing the Blogs of Investigative Blogger Counter-Plaintiff Crystal Cox in the Summer of 2011, Proskauer Rose then Enlisted Co-Conspirators Counter-Defendant Peter L. Michaelson and Counter-Defendant Marc Randazza In the Spring of 2012, when Counter-Defendant Counter-Defendant Marc Randazza Filed a Domain Name Dispute with the Czech Arbitration Court based in Prague (adr.eu). The Czech Arbitration Court case worker was Tereza Bartoskova. The Czech Arbitration Court case number was Administrative proceeding No. 100472. This domain name dispute was filed by Counter-Defendant Marc John Randazza. It was filed against Counter-Plaintiff Crystal Cox and Defendant Eliot Bernstein. Czech Arbitration Court case Administrative proceeding No. 100472 is hereby included as evidence into this case, in its' entirety, including all documents, emails, filings, answers, phone records, and all information in this case
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Czech Arbitration Court case Administrative proceeding No. 100472 was cancelled after months

of document and exhibit submissions as well as Respondent / Counter Plaintiff Crystal Cox's answer being filed. Counter-Defendant Attorney Marc Randazza did not notify Respondents, Defendant Eliot Bernstein and Counter-Plaintiff Crystal L. Cox. Counter-Defendant Marc Randazza then, at some point after this, and with no reason as to why the Czech case was cancelled, Counter-Defendant Marc Randazza filed a WIPO Dispute.

Respondents, Defendant Eliot Bernstein and Counter-Plaintiff Crystal L. Cox was not notified by Counter-Defendant Marc Randazza and found out, too late to file a response.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza conspired criminally and civilly with Counter-Defendant David Aman, Counter-Defendant Steven WIlker and Counter-Defendant Mike Morgan of Counter-Defendant Tonkon Torp Law Firm in this matter as well, as they were attorneys for Enron, which collapsed due to deals with Counter-Defendant Proskauer Rose Law firm regarding the iViewit Technology.

Counter-Defendant Marc Randazza criminally and civilly conspired with Counter-Defendant Proskauer Rose to get a “Ruling” that Proskauer Rose can later use to STOP the flow of information regarding the iViewit Technology. Counter-Defendant Marc Randazza conspired with Counter-Defendant Tonkon Torp Lawyer David S. Aman to SEIZE the “Right to Appeal” of Counter-Plaintiff Crystal Cox, in a Sheriff Sale of Counter-Plaintiff Crystal Cox’s Assets.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza coached, conspired with, counseled Counter-Defendant Tonkon Torp Lawyer David S. Aman and Counter-Defendant Steven Wilker Opposing Counsel in regard to seizing Counter-Plaintiff Crystal Cox’s right to appeal as an ASSET. Thereby stopping the iVieiwt Story and the attention coming to the Investigative Blogs of Counter-Plaintiff Crystal Cox.

Counter-Defendant Marc Randazza has set out to sabotage Counter-Plaintiff Crystal Cox, in her, my Ninth Circuit Appeal from the Beginning, first as Counter-Plaintiff Crystal Cox’s attorney negotiating with Counter-Defendant Tonkon Torp Lawyer David S. Aman on Counter-Plaintiff Crystal Cox’s behalf, allegedly in Counter-Plaintiff Crystal Cox’s best interest.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza conspired criminally and civilly with Counter-Defendant Jordan Rushie of Mulvihill and Rushie LLC Philly Law Blog, Counter-Defendant Brown White $ Newhouse, Counter-Defendant Kenneth P. White,Popehat.com, Counter-Defendant Eric Turkewitz - Turkewitz Law Firm and NewYorkPersonalInjuryAttorneyBlog.com, Counter-Defendant Scott H. Greenfield of Simple Justice - a New York Criminal Defense Blog, Counter-Defendant Mark Bennett blog.bennettandbennett.com Bennett and Bennett, Counter-Defendant

Bob Garfield of NPR, Counter-Defendant David Carr of the New York Times, Counter-Defendant Kashmir Hill of Forbes and other John and Jane Doe Attorneys, Journalists and Law Firms, in an online campaign to defame, discredit the blogs of Counter-Plaintiff Crystal Cox and to make ounter-Plaintiff Crystal Cox look like a Criminal.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza's conspiracy would fail if Counter-Plaintiff Crystal Cox is allowed to go to the Ninth Circuit Appeal and Wins, thereby giving even more credibility to her, Counter-Plaintiff Crystal Cox's blogs reporting on their criminal and civil conspiracy. Therefore, Counter-Defendant Marc Randazza conspired criminally and civilly with Counter-Defendant Tonkon Torp Lawyers to STOP my, Counter-Plaintiff Crystal Cox's Ninth Circuit Appeal.

Counter-Defendant Marc Randazza criminally and civilly conspired with Counter-Defendant Tonkon Torp Law Firm, as this lawsuit and Obsidian V. Cox are harassing and intimidating lawsuit that violated my fundamental free speech right and now is trying to be denied a right to appeal.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza criminally and civilly conspired with Counter-Defendant Tonkon Torp Law Firm to Deny Due Process in opposite constitution rights to appeal. Counter-Defendant Marc Randazza has committed fraud on this court in claiming the belief that Counter-Plaintiff Crystal Cox is a Montana Resident. The WIPO Complaint was in the name Reverend Crystal Cox as obtained from the Domain Name Whois Data Base, which also showed I was in Washington State, Counter-Defendant Marc Randazza criminally and civilly conspired with Tonkon Torp on seizing Counter-Plaintiff Crystal Cox's "Right to Appeal" as an asset and Counter-Defendant Marc Randazza is covering up that fact that he knows Counter-Plaintiff Crystal Cox am in Washington State, as Counter-Defendant Marc Randazza has advised Counter-Defendant David Aman and Counter-Defendant Steven Wilker of Tonkon Torp Law Firm on how to seize Counter-Plaintiff Crystal Cox's rights as it pertains to Washington Law and not Montana Law.

Counter-Defendant Marc Randazza has Criminally and Civilly Conspired with

Counter-Defendant Godaddy Inc., this Court, Counter-Defendant WIPO and Counter-Defendant Judge Gloria Navarro in illegally seizing domain names, redirecting thousands of blog posts and Counter-Plaintiffis entitled to compensation. This court is not a Domain Appraisal Expert, and yet has had Counter-Defendant Post a Bond of $100 per blog, per domain. MarcRandazza.com alone is worth Millions, Counter-PlaintiffCrystal Cox's Right to Appeal is with 100's of Billions, Counter-PlaintiffCrystal Cox's Blog network is worth over 100 Million.

Redirecting Counter-Plaintiff Crystal Cox's domain names in conspiracy is a theft, permanent damage to Counter Plaintiff Crystal Cox, a crime, an AntiTrust Violation, Fair Competition Law Violation and is fraud on this court. Counter-Defendant Godaddy Inc. who Sold the Domain Names, illegally gave the domain names to Counter-Defendant Marc Randazza, changing the server and breaking thousands of links forever.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza has acted in criminal and civil conspiracy to paint me, Counter-Plaintiff Crystal Cox in false light, defame me and accuse me of a crime in mass media, legal blogs and public radio in order to attempt to discredit my blogs reporting the iViewIt Technology Story. And to remove blogs that connect Counter-Defendant Marc Randazza to those infringing on the iViewit Technology and owing Billions to the iViewit Technology Company, Defendant Eliot Bernstein.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza has Criminally and Civilly Conspired in accusing me, Counter-Plaintiff Crystal Cox publicly of the Crime of Extortion. I, Counter-Plaintiff Crystal Cox have never extorted anyone. I, Counter-Plaintiff Crystal Cox did not ask Counter-Defendant Marc Randazza for money to remove blog posts. Counter-Defendant Marc Randazza offered to buy domain names from Counter-Plaintiff Crystal Cox. Counter-Plaintiff Crystal Cox refused, as the Exhibits to this Complaint Show.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza has Criminally and Civilly Conspired with other bloggers and big media in accusing Counter-Plaintiff Crystal Cox publicly of the Crime of Extortion.

Counter-Defendant Marc Randazza also offered to buy domain names from Monica Foster aKa Alex Melody, when she refused Marc Randazza threatened her, stole domain names with the use of Jessica Griffin Godaddy Insider. For fear of her life and livlihood Monica Foster aKa Alex Melody Gave MarcRandazza.com back to Counter-Plaintiff Crystal Cox in hopes she would not be stalked, threatened, defamed, beaten or even murdered by Counter-Defendant Marc Randazza and his connections .

Counter-Defendant Marc Randazza has Criminally and Civilly

Conspired with Godaddy Inc.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, **Counter-Defendant** Godaddy has Criminally and Civilly conspired with Counter-Defendant Marc Randazza to steal the following domain names without due process.

marcrandazza.me
marcrandazza.com
marcjrandazza.com
fuckmarcrandazza.com
marcjohnrandazza.com
marcrandazzasucks.com
marcrandazzaisalyingasshole.com
marcrandazza.biz
marcrandazza.info
marcrandazza.mobi
marcrandazzaparody.com
exposemarcrandazza.com
randazzalegalgroupsucks.com
trollmarcrandazza.com
hypocritemarcrandazza.com
crystalcoxmarcrandazza.com

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, **Counter-Defendant** Godaddy has Criminally and Civilly conspired with Counter-Defendant Marc Randazza to change domain name servers to point to blog posts inciting hateful and defamatory remarks about Counter-Plaintiff Crystal Cox. Blog posts which are posted by those acting in criminal and civil conspiracy with Counter-Defendant Marc Randazza to intimidate, threaten, gag, harass Counter-Plaintiff Crystal Cox and to paint a picture that is fraud on the courts to get thousands of blog posts regarding the iViewit Stolen Video Technology, removed from the search engines permanently. This action violates AntiTrust Laws, Fair Competition Laws and Gives Counter-Defendant Marc Randazza and unfair advantage in the search engines based on Counter-Plaintiff Crystal Cox's, my money, my time, and my intellectual property.

The Above Domain Names were seized in Criminal and Civil Conspiracy with Counter-Defendant Marc Randazza, Counter-Defendant GoDaddy, Counter-Defendant Peter L. Michaelson, WIPO, and Judge Gloria M. Navarro. The Above domain names now link to the following Post Content on Marc Randazza's Blog "The Legal Satyricon" and to a Blog Post Linking to Defamation in Regard to Counter-Plaintiff Crystal Cox and Defendant Eliot Bernstein.

Counter-Defendant Godaddy Inc. Criminally and Civilly conspired with Counter-Defendant

Marc Randazza, as Godaddy Inc. never unlocked the domain names AFTER Counter-Defendant Marc Randazza withdrew Czech Arbitration Court case Administrative proceeding No. 100472. Godaddy Inc. Aided and Abetted Counter-Defendant Marc Randazza to keep Domain Names locked, unlawfully and against UDRP Rules.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza conspired Criminally and Civilly with Counter-Defendant WIPO, Counter-Defendant Godaddy Inc., Counter-Defendant Proskauer Rose Law Firm, MPEG LA, Counter-Defendant Kenneth Rubenstein, Hon. Judith Kaye, Counter-Defendant Peter L. Michaelson and other John and Jane Doe's in stealing domain names from Respondents, Defendant Eliot Bernstein and Counter-Plaintiff Crystal L. Cox in order to stop the flow of information regarding the iViewit Technology Theft and the involvement of and infringement of Counter-Defendant Marc Randazza' clients Counter-Defendant Manwin, Counter-Defendant Corbin Fisher and other Porn Industry Companies. And to protect the illegal technology infringement of Warner Bros., APPLE, MPEG LA, and other John and Jane Doe's. And to protect the involvement of Counter-Defendant Proskauer Rose Law Firm, Counter-Defendant Proskauer Rose Patent Attorney Kenneth Rubenstein, Hon. Judith Kay and other John and Jane Doe's. Judith Kaye and Kenneth Rubenstein are both major iViewit Defendants in RICO and Anti-Trust Lawsuits.

Counter-Defendant Marc Randazza has Criminally and Civilly conspired with Counter-Defendant Godaddy Inc. and Counter-Defendant Bob Parsons Godaddy President to suppress the iViewit Technology Story. Counter-Defendant Godaddy, and Bob Parsons are infringing on the iViewit Technology, and are invested in multiple companies who also infringe on the iViewit Technology.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Godaddy criminally and civilly conspires with Counter-Defendant Marc Randazza in not following UDRP Rules, Laws and Regulations, Godaddy simply takes whatever legal document Counter-Defendant Marc Randazza, Randazza Legal Group gives them and acts in civil and criminal conspiracy to do whatever Counter-Defendant Marc Randazza tells Counter-Defendant Godaddy to do.

Counter-Defendant Marc Randazza has Criminally and Civilly Conspired with Counter-Defendant John C. Malone and Counter-Defendant Liberty Media (LINTB).

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza has acted in criminal conspiracy with **Counter-Defendant** John C. Malone, Rich Baer, Evan D. Malone, David E. Rapley, Larry E. Romrell, Donne F. Fisher, Gregory B. Maffei, Andrea L. Wong, Robert R. Bennett, M. Ian G. Chilchrist, and Liberty Media (**LINTB**) and **Counter-Defendant** Liberty Media (**LINTB**) owned companies **Counter-Defendant** PBS, **Counter-Defendant** Sprint Nextel Corporation,**Counter-Defendant** Starz, Time Warner Cable, Time Warner Inc., Viacom Inc., Centurylink, Crown Media Holdings, Liberty Associated Partners LLC, Barnes and Noble, Liberty Media Corporation, Acquire Media, Associated Partners L.P., MacNeil/Lehrer, Live Nation Entertainment Inc., Kroenke Arena Company LLC, Atlanta National League, Corbin Fisher, Brazzers, Encore, E! Entertainment, Time Warner Entertainment, Nine German Owned Cable Companies, Manwin, Discovery Channel, News Corporation, QVC, AT&T, Gary Magness, Magness Securities, Paul A. Gould, Jerome H. Kern, Kim Magness, Charles Y. Tanabe, TCI, Liberty Media Holdings, Xbiz, Corbin Fisher, Playboy, Hustler, The Weinstein Company, Playboy Enterprises, Warren Buffet, Disney, Netflix, APPLE, Liberty Media Corp NASDAQ:LMCA, and John and Jane Doe's, to suppress the investigative blogs of Counter-Plaintiff Crystal Cox reporting on the Iviewit Videos Technology in which they all infringe on and owe iViewit Technologies Billions of Dollars.

These Liberty Media Holdings companies are named in the iViewit RICO Complaint, RICO Lawsuit, SEC Complaint, USPTO Complaint, New York Whistleblower Whitewashing Cases, Attempted Murder and Car Bombing cases involving iViewit Technology, Florida Bar Lawsuits, Department of Justice Investigations and more.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza has acted in criminal conspiracy with **Counter-Defendant** John C. Malone and **Counter-Defendant** Liberty Media (**LINTB**) and affiliated companies in order to suppress the iVieiwt Technology story because his client Liberty Media / Liberty Media Holdings LLC who owns part of **Counter-Defendant** Time Warner Inc., Time Warner Cable and Viacom, as well as Part or All of the Following who infringe on the iViewit Technology: Encore, Startz, **TCI Ventures Group LLC, ATT, Liberty Digital Inc., TCI Satellite Entertainment Inc, Discovery Channel, News Corporation, Netflix, QVC, MediaOne Group, CBS, The Weinstein Company, Counter-Defendant Liberty Capital, Counter-Defendant Corbin Fisher,** Liberty Global, Belgium's Telenet Group Holding, Sirius Radio, Barnes and Noble, Discover Communications, Malone Family Foundation, in Connection with the Cato Institute, and other Jane and John Doe's to be added in defaming, harassing, removing investigative blogs, suppressing information and stealing intellectual property of Counter-Plaintiff Crystal Cox.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza has acted in criminal conspiracy with Counter-Defendant John C. Malone and all owned companies and associated people above, in a massive deception, fraud on shareholders. Counter-Defendant Marc Randazza, Counter-Defendant John C. Malone, Rich Baer, Counter-Defendant Evan D. Malone and all above know of Liberty Media infringing on the iViewit Video Technology and the massive liability this is to Liberty Media and all people, companies, shareholders listed above in connection to Liberty Media owned companies.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza has acted in criminal conspiracy with Counter-Defendant John C. Malone and Counter-Defendant Liberty Media to commit Shareholder Fraud, Insider Trading, Sec Violations, Anti-Trust Violations, Securities Fraud and continued infringement on the iViewit Video Technology in spite of known NDA's, Legal Contracts, Inventors Rights and the FACT that Counter-Defendant Marc Randazza, Liberty Media and Counter-Defendant John C. Malone knowingly fail to disclose this Trillion Dollar Liability to shareholders of Liberty Media and Associated Companies.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza has conspired Criminally and Civilly with Counter-Defendant John C. Malone, Liberty Media, Time Warner Inc., Viacom, MPEG LA, Counter-Defendant Proskauer Rose Law Firm, Counter-Defendant Patent Attorney Kenneth Rubenstein, INTA, Counter-Defendant Peter L. Michaelson, Francis Gurry, WIPO, Bell Telephone Laboratories, AT&T, Counter-Defendant Stephen Lamont, Warner Bros., Counter-Defendant AOL, SONY, and other John and Jane Doe's to remove information from the Internet Regarding the worlds largest technology crime, the theft of the iViewit Technology by Counter-Defendant Proskauer Rose Patent Attorneys and Co-Conspirators. And to remove information, blogs by Investigative Blogger Counter Plaintiff Crystal Cox regarding their involvement in stealing, infringing on the iViewit Technology.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant John C. Malone began his business career at Bell Telephone Laboratories of AT&T. Counter-Defendant Kenneth Rubenstein, the Head Proskauer Rose Patent Attorney involved in criminal and civil conspiracy of stealing the iViewit was at Bell Labs associated with Counter-Defendant John C. Malone and Counter-Defendant WIPO Panelist Peter L. Michaelson. Counter-Defendant Marc Randazza has conspired Criminally and Civilly with Counter-Defendant John C. Malone, Counter-Defendant Kenneth Rubenstein, Counter-Defendant Peter L. Michaelson, Liberty Media and other John and Jane Doe's in intimidating, harassing, defaming, criminally endangering, Counter-Plaintiff Crystal Cox and Defendant Eliot Bernstein.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant John

C. Malone, Counter-Defendant Kenneth Rubenstein, Counter-Defendant Peter L. Michaelson, all worked at Bell Labs and have criminally and civilly conspired with Counter-Defendant Marc Randazza and Co-Conspirators, Counter Defendants to discredit and remove blogs by Investigative Blogger Counter Plaintiff Crystal Cox, that expose the Co-Conspirators of the Biggest Technology Crime in the World, iViewit Technology Theft. Iviewit Companies include and are not limited to, Iviewit Holdings, Inc. – DL, Iviewit Holdings, Inc. – FL, Iviewit Technologies, Inc. – DL, Uviewit Holdings, Inc. – DL, Uview.com, Inc. – DL, Iviewit.com, Inc. – FL, Iviewit.com, Inc. – DL, I.C., Inc.)

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza has conspired Criminally and Civilly with Counter-Defendant John C. Malone, Counter-Defendant Kenneth Rubenstein, Counter-Defendant Peter L. Michaelson, Counter-Defendant Liberty Media, Counter-Defendant Godaddy, Judge Gloria M. Navarro and other John and Jane Doe's to remove thousands of blogs posts and associated links exposing those involved in the iViewit Technology Theft. And Criminally and Civilly to steal domain names, redirect domain names, and steal intellectual property, personal property of Defendant Eliot Bernstein, iViewIt Founder and of Counter-Plaintiff Crystal Cox in order to suppress information involving the iViewit Company, and the known technology infringement of Counter-Defendant Marc Randazza and Counter-Defendant Jordan Rushie, Philly Law Blog client Counter-Defendant Liberty Media, John C. Malone and All Associated Companies infringing on the iViewit Technology.

Counter-Defendant Marc Randazza has conspired Criminally and Civilly with Counter-Defendant John C. Malone, Liberty Media, McKinsey & Company, Counter-Defendant John Calkins, Warner Bros., Time Warner Inc., SONY Entertainment, Counter-Defendant Doug Chey, Counter-Defendant Scott Sherr, Todd Outten, Counter Defendant Doug Chey AOL,Counter Defendant Tracy L. Coenen, Tim Cook, Julie Jacobs, Warren Lieberfarb, Lieberfarb and Associates, Sony Pictures Entertainment, Intel, Counter Defendant Bruce Sewell, H. Hickman Powell, Crossbow Ventures, Chuck Dages, Alan E. Bell, Counter Defendant Kenneth Rubenstein, WB Online, Sam Smith, Joe Annino, Jack Scanlon, Real Producer, WMP Developer Guides, Media Cleaner Pro, AOLTW, Microsoft, Toshiba, Best Buy, Samsung, Columbia House, and John and Jane Doe's in removing blogs reporting on the suppressing information regarding massive shareholder fraud, racketeering, sec fraud, suppressing and removing iViewit Technology, stealing domain names related to the iViewit Technology theft story, removing blogs from the search engines related to the iViewit Technology theft and in intimidation - defamation - harassment campaigns against Investigative Blogger Counter-Plaintiff Crystal Cox and against Investigative Blogger Monica Foster aKa Alex Melody and Diana Grandmason aKa Desi Foxx, who are both named in Counter-Defendant Marc Randazza's complaint against Defendant, Investigative Blogger Crystal L. Cox. by Counter-Defendant Marc Randazza in criminal and civil conspiracy .

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza has conspired Criminally and Civilly with Counter-Defendant John C. Malone, Liberty Media and Counter-Defendant John Calkins of SONY. Both Counter-Defendant John C. Malone and Counter-Defendant John Calkins were with McKinsey & Company. Counter-Defendant John Calkins is the Executive Vice President of Global Digital and Commercial Innovation for Sony Pictures Home Entertainment, and was at Warner Bros. when Warner Bros. Signed NDA's - Non Disclosure Agreements Regarding the iViewit Video Technology, and is one of the original co-conspirators in the iViewit Technology Theft, involving his direct connection with Warner Bros. and SONY, and massive shareholder fraud in not disclosing this liability.

Counter-Defendant Marc Randazza has Criminally and Civilly Conspired with Multiple Legal Bloggers, CPA's Attorneys and Journalist in an Whistleblower Retaliation Harassment Campaign.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza, as Exhibits A-Z attached to this complaint Show has acted in criminal and civil conspiracy with Counter-Defendant Bob Garfield NPR, Counter-Defendant Kashmir Hill Forbes, Counter-Defendant Jordan Rushie Philly Law Blog, David Carr New York Times, Counter-Defendant Kenneth P. White Popehate.com, Counter-Defendant Jason Jones SaltyDroid.info, SiouxsieLaw.com, Counter-Defendant SequenceInc.com, Counter-Defendant Tracy Coenen, Counter-Defendant Mark Bennett blog.bennettandbennett.com, Bennett and Bennett, Counter-Defendant Scott H. Greenfield, Counter-Defendant Carlos Miller, Counter-Defendant Eric Turkewitz - Turkewitz Law Firm and NewYorkPersonalInjuryAttorneyBlog.com, Counter-Defendant Scott H. Greenfield of Simple Justice - a New York Criminal Defense Blog and blog.simplejustice.us, Counter-Defendant Carlos Miller of PixIQ.com and PhotographyisNotaCrime.com, Las Vegas Review-Journal, the Las Vegas Sun, VegasInc, Las Vegas CityLife, Las Vegas Weekly, Counter-Defendant Stephens Media and other John and Jane Doe's in an Online Hate, Defaming, Criminal Endangerment, Information Suppressing, Whistleblower Retalitation Harassment Campaign.

Counter-Defendant Marc Randazza has Criminally and Civilly Conspired with the above in order to defame, harass, intimidate investigative bloggers and those who speak out about the Porn Industry Companies he represents. Counter-Defendant Marc Randazza has Criminally and Civilly Conspired with the above in order to get them to back down from legal actions that affect the financial bottom line of Counter-Defendant Liberty Media and other Co-Conspirators. Counter-Defendant Marc Randazza has Criminally and Civilly Conspired with the above in massive shareholder fraud campaign, and fraud on the courts, misrepresentation to the court.

Counter-Defendant Marc Randazza has Criminally and Civilly Conspired with the above in mass “Internet Mobbing” in order to control the outcome of court cases, use their blogs as exhibits in court cases, and to intimidate, harass, threaten and defame Insiders, Whistleblower and Investigative Reports who attempt to expose them.

Counter-Defendant Marc Randazza conspired criminally and civilly with Counter-Defendant Martin Cain, Counter-Defendant Dylan Energy to defame, harass, intimidate Counter Plaintiff Crystal Cox On belief and Knowledge that, Counter-Defendant Marc Randazza has been in contact Counter-Defendant Martin Cain. Counter-Defendant Martin Cain was a real estate client of Counter Plaintiff Crystal Cox, and a to be a contracted Investigative Blogger. Counter-Defendant Martin Cain committed fraud on the Montana Board of Realty Regulations in regard to the Real Estate Broker License of Counter Plaintiff Crystal Cox. . Counter-Defendant Martin Cain attempted to take domain names, shut down blogs, and threatened to come for me. . Counter-Defendant Martin Cain left threatening voicemails which I posted online for my safety and to expose . Counter-Defendant Martin Cain and his company Counter-Defendant Dylan Energy got those voicemails removed from the Internet. Counter-Defendant Dylan Energy, Counter-Defendant Martin Cain has been in contact with Counter-Defendant Marc Randazza and Counter-Defendant Marc Randazza as well as other co-conspirators who are bloggers that are CPA’s, Attorneys, and Big Media Reporters have posted private eMails between Counter-Defendant Martin Cain and Counter Plaintiff Crystal Cox.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza is gathering more of what he calls “Victims” as is Counter-Defendant Roxanne Grinage and threatening class action lawsuits in order to remove blogs, content on the iViewit Story and to “Shakedown” iViewit, Defendant Eliot Bernstein who Counter-Defendant Roxanne Grinage, Counter-Defendant HireLyrics worked for, under contract.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Roxanne Grinage, Counter-Defendant HireLyrics has conspired criminally and civilly with Counter Defendant Steve Dowling, APPLE, Counter Defendant Bruce Sewell, Counter Defendant Stephen Lamont ,and other John and Jane Doe Defendants in order to sabotage a settlement between iViewit Technology and APPLE. Counter-Defendant Roxanne Grinage, Counter-Defendant HireLyrics contacted Counter Defendant Steve Dowling, APPLE, Counter Defendant Bruce Sewell directly as the records show, and defamed, painted in false light, Counter Plaintiff Crystal Cox and Defendant Eliot Berstein.

This Brought a Multi-Billion Dollar Settlement Negotiation between APPLE and iVieiwIt

Technology to a halt.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Sean Boushie threatened to kill Counter Plaintiff Crystal Cox in August of 2009, Montana County Attorney Bernie Cassidy has records that show Counter-Defendant Sean Boushie threatening Counter Plaintiff Crystal Cox, as does co-conspirator Officer Maury McKinney, and they have concealed this information to protect his co-conspirators covering up corruption in Montana. Counter-Defendant Sean Boushie works at the University of Montana, and for over 3 years, while at work at the University of Montana under the supervision of Counter-Defendant Royce Engstrom, has gathered haters, violated the Hate Crime Prevention Act, Committed Hate Crimes, posted on craigslist over and over to solicit others to hate, defamed, threatened, and put Counter Plaintiff Crystal Cox under extreme duress. Counter-Defendant University of Montana has been aware of Counter-Defendant Sean Boushie committing criminal acts while on paid time, and Counter-Defendant University of Montana has refused for over 3 years to take actions. Counter-Defendant Royce Engstrom has been notified for over 3 years and has criminally and civilly conspired to intimidate, harass, defame and threaten Counter Plaintiff Crystal Cox reporting on Corruption in Montana heavily since 2005.

Counter Plaintiff Crystal Cox sued Counter-Defendant Sean Boushie in 2009, for defamation, with absolute proof and County Attorney Bernie Cassidy blocked all actions that exposed Montana Corruption. Counter Plaintiff Crystal Cox's then attorney Kai Groenke took large amounts of money from her client Counter Plaintiff Crystal Cox and left Counter Plaintiff Crystal Cox with no help available by law to limit the financial harm to Counter Plaintiff Crystal Cox business, left Counter Plaintiff Crystal Cox under dangerous threats with no protective order, harassed and intimidated Counter Plaintiff Crystal Cox and continues to defame, paint Counter Plaintiff Crystal Cox in false light in legal documents and in criminal and civil conspiracy.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza, Counter-Defendant Sean Boushie, Counter Defendant David S. Aman, Counter-Defendant Roxanne Grinage, Counter-Defendant HireLyrics, Tim Vawter, The Protection Group and other John and Jane Doe Counter Defendants are conspiring criminally and civilly to gather more of whom they falsely call Crystal Cox "Victims". These "Victims" are really those whom Counter Plaintiff Crystal Cox write stories on, publish news and tips, and report on.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza, Counter-Defendant Sean Boushie, Counter Defendant David S. Aman, Counter-Defendant Roxanne Grinage have put Counter Plaintiff Crystal Cox under extreme duress, threats, defamation online in blogs and videos, contacted others in conspiring and committing a Hate Crime, and actively seek others to join in an online hate campaign against Counter Plaintiff Crystal Cox in order to violate Counter Plaintiff Crystal Cox's First Amendment Rights, Shut down Counter Plaintiff Crystal Cox's blogs, steal Counter Plaintiff Crystal Cox's domain names and intellectual property and sabotage, tortiously interfere with any potential real estate business, seo business, marketing business, or seo busines Counter Plaintiff Crystal Cox could have, and have interfered with Counter Plaintiff's Prospective Business Advantage.

Counter-Defendant Marc Randazza has Criminally and Civilly Conspired with Counter-Defendant Wordpress, Insiders at Google and a Ring of Attorneys Marking Blogs as Spam to remove information regarding the stolen iViewit Technology and the involvement of Counter-Defendant Marc Randazza's clients and co-conspirators.

Counter-Defendant Marc Randazza has had massive wordpress blogs removed, videos removed and flagged in civil and criminal conspiracy in order to remove information regarding the iViewit Video Technology story.

Counter-Defendant Marc Randazza has Criminally and Civilly Conspired with Counter-Defendant WIPO Panelist Peter L. Michaelson in Domain Name Theft, Removal of iViewit Content Online, Public Defamation, Harassment, and illegally stating that Defendant Eliot Bernstein and Counter-Plaintiff Crystal Cox are Guilty of the Crime of Extortion, of which Defendant Eliot Bernstein nor Counter-Plaintiff Crystal Cox are guilty of or have been investigated for.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza conspired Criminally and Civilly with Counter-Defendant Peter L. Michaelson, who was the Sole WIPO Panelist. Counter-Defendant Peter L. Michaelson Criminally and Civilly Conspired with Counter-Defendant Marc Randazza in order to seize domain names that exposed the iViewit Technology Story. Counter-Defendant Peter L. Michaelson, WIPO Panelist has undisclosed conflicts of Interest with close ties with Counter-Defendant Marc Randazza and INTA connections and witnesses say they have met at INTA meetings on a regular basis and have a personal relationship.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Peter L. Michaelson, WIPO Panelist has undisclosed conflicts of Interest and has acted Criminally and Civilly with Counter-Defendant Kenneth Rubenstein, MPEG LA lead patent attorney, who is a Counter-Defendant Proskauer Rose Attorney that was iViewit's Patent Attorney, whom is the lead on the Stealing of the iViewit Technology.

Counter-Defendant Proskauer Rose Lawyers and Law Firm have conspired with the main Defendants in the Iviewit RICO, SEC, Federal RICO Lawsuit and Anti-Trust Complaints.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, In Criminal and Civil Conspiracy with Counter-Defendant Marc Randazza, Sole Panelist Counter-Defendant Peter L. Michaelson has defamed Counter-Plaintiff Crystal Cox and iViewit Founder / Inventor Defender Eliot Bernstein. Sole Panelist Counter-Defendant Peter L. Michaelson has massive, undisclosed conflicts of interest in this WIPO decision.

In this WIPO case Sole Panelist Counter-Defendant Peter L. Michaelson has accused me, Counter-Plaintiff Crystal L. Cox and Defendant Eliot Bernstein of the Crime of Extortion. This was done in criminal and civil conspiracy with Counter-Defendant Marc Randazza, Counter-Defendant Proskauer Rose, Counter-Defendant Kenneth Rubenstein and Counter-Defendant WIPO.

Counter-Defendant Marc Randazza has Criminally and Civilly Conspired with INTA, Counter-Defendant Peter L. Michaelson, WIPO and John and Jane Does Regarding the name "Marc Randazza and Fraudulent Trademark Claims.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Sole Panelist Counter-Defendant Peter L. Michaelson knows that Defendant Eliot Bernstein and Counter-Plaintiff Crystal Cox was not under criminal investigation for Extortion, and Sole Panelist Counter-Defendant Peter L. Michaelson knows that Defendant Eliot Bernstein and Counter-Plaintiff Crystal Cox has had no criminal charges filed, no criminal trial, and certainly no criminal conviction of any kind. Defendant Eliot Bernstein and Counter-Plaintiff Crystal Cox was not on trial for Extortion nor has Defenand Eliot Bernstein nor Counter-Plaintiff Crystal Cox had a criminal extortion complaint filed. Sole Panelist Counter-Defendant Peter L. Michaelson, in criminal conspiracy with Counter-Defendant Proskauer Rose and Counter-Defendant Marc Randazza flat out states that Respondent Eliot Bernstein and Crystal Cox are guilty of the crime of extortion.

Sole Panelist Counter-Defendant Peter L. Michaelson accused Counter Defendant Eliot Bernstein and Counter-Plaintiff Crystal Cox of the Crime of Extortion in a WIPO decision that is now picked up by Big Media, Countless Bloggers and is published globally in legal documents, dockets, intellectual property blogs magazines, and more. Therefore, Sole Panelist Counter-Defendant Peter L. Michaelson has massively defamed and criminally endangered Counter-Plaintiff Crystal Cox and Defendant Eliot Bernstein, as well as interfered with ongoing iViewit Technology investigations by these false Criminal Allegations of iViewit Founder Defendant Eliot Bernstein.

Sole Counter-Defendant Panelist Peter L. Michaelson's accusations in a distinguished WIPO Decision has massively defamed Defendant Eliot Bernstein and Counter-Plaintiff Crystal Cox. This has lead to character attacks, further defamation and incited hate toward Investigative Blogger Counter-Plaintiff Crystal L. Cox.

Sole Panelist Counter-Defendant Peter L. Michaelson took the word of the Counter-Defendant Marc Randazza, a Las Vegas Porn Attorney, over the word and documented proof of Counter-Plaintiff Crystal Cox.

Sole Panelist Counter-Defendant Peter L. Michaelson did no fact check or investigation into the allegations of Extortion. Sole Panelist Counter-Defendant Peter L. Michaelson simply accused Defendant Eliot Bernstein and Counter-Plaintiff Crystal Cox of Extortion in a WIPO Decision.

WIPO is not a Criminal Investigation Court. WIPO is not a Judge and a Jury. Yet Sole Panelist Peter L. Michaelson in conspiracy with Counter-Defendant WIPO, Counter-Defendant Proskauer Rose and Counter-Defendant Marc Randazza took it upon himself to convict Counter-Plaintiff Eliot Bernstein and Counter-Plaintiff Crystal Cox of Extortion.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Co-Conspirator, Sole Panelist Counter-Defendant Peter L. Michaelson in conspiracy with Counter-Defendant WIPO, Counter-Defendant Proskauer Rose and Counter-Defendant Marc Randazza has violated the constitutional and intellectual property rights of Defendant Eliot Bernstein and Counter-Plaintiff Crystal Cox.

Sole Panelist Counter-Defendant Peter L. Michaelson, in criminal conspiracy with Counter-Defendant Proskauer Rose, Counter-Defendant WIPO and Counter-Defendant Marc Randazza refused to signed a Conflict of Interest Disclosure in the WIPO Decision regarding Counter-Defendant Marc Randazza of Counter-Defendant Randazza Legal Group against Counter-Plaintiff Crystal Cox and Defendant Eliot Bernstein. Counter-Plaintiff Crystal Cox requested that the WIPO Panel Sign a Conflict of Interest Disclosure. This request was sent to Sole Panelist Counter-Defendant Peter L. Michaelson by WIPO and yet was NOT Signed and returned to defendant Eliot Bernstein and Counter-Plaintiff Crystal Cox.

Sole Panelist Counter-Defendant Peter L. Michaelson has massive conflicts of interest regarding iViewit, Counter-Defendant Proskauer Rose, MPEG LA, Judith Kaye, Patent Theft, Eliot Bernstein and more regarding Eliot Bernstein and the Journalism of Investigative Blogger Crystal Cox regarding ALL named in the iViewit SEC Complaint, RICO Complaint and Legal Action surrounding iViewit Technologies Video Technology Theft by Counter-Defendant Proskauer Rose Attorneys.

Sole Panelist Counter-Defendant Peter L. Michaelson worked at Bell Lab with Counter-Defendant Proskauer Rose Attorney Counter-Defendant Kenneth Rubenstein whom was the main Patent Attorney involved in the theft of the 13 Trillion Dollar iViewit Technology theft. Proskauer Rose Patent attorney, who is also the MPEG LA head patent attorney, is named in RICO Complaints, Patent Lawsuits, and more regarding the iViewit Technology and Eliot Bernstein.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Peter L. Michaelson knows that he has massive conflicts of interest regarding being a Sole Panelist reviewing Domain Names owned by iViewit Founder and one of the iViewit Inventors, Eliot Bernstein. Counter-Defendant Peter L. Michaelson knows that he has massive conflicts of interest regarding being a Sole Panelist reviewing Domain Names owned by Investigative Blogger Crystal L. Cox whom Peter L. Michaelson know has been reporting on the iViewit Technology theft for over 3 years. In fact, Counter-Defendant Peter L. Michaelson was a requested Panelist by Counter-Defendant Proskauer Rose Law Firm in WIPO Case (TG) D2011-0678, (CT) D2011-0679,(CT) D2011-0677, (CT) D2011-0675 (Complainant Proskauer Rose), regarding Domain Name Disputes with Counter-Defendant Proskauer Rose Lawyers and Investigative Blogger Crystal L. Cox. For proof of this, review the emails of that Case.

Sole WIPO Panelist Peter L. Michaelson has conflicts of interest with MPEG LA, whom is

named in the Eliot Bernstein RICO Complaints, SEC Complaints and Technology Infringement. Sole WIPO Panelist Counter-Defendant Peter L. Michaelson has conflicts of interest with MPEG LA's patent attorney Counter-Defendant Kenneth Rubenstein of Counter-Defendant Proskauer Rose Law Firm whom was the original Patent Attorney for iViewit and originally stole the 13 Trillion Dollar iViewit Technology.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Peter L. Michaelson is connected with Proskauer Rose in regard to the International Commission on Patent Disputes and the CPR Protocol on Determination of Damages in Arbitration. This too is an undisclosed Conflict of Interest.

Sole WIPO Panelist Counter-Defendant Peter L. Michaelson is connected to ex-Supreme Court Judge Judith Kaye who is also named in RICO Complaints, SEC Complaint, Patent Lawsuits and more in the iViewit Technology theft. As Judith Kaye was involved in covering up the theft. This was connected to the fact that her Husband was a Counter-Defendant Proskauer Rose Lawyer at that time, whom is now deceased.

In WIPO Decision Case No. D2012-1525, Sole Panelist Counter-Defendant Peter L. Michaelson names Counter-Defendant Proskauer Rose, and discusses my investigative writing of Counter-Defendant Proskauer Rose, Counter-Defendant Bruce Sewell Apple General Counsel who was Intel General Counsel when the iViewit Technology was stolen and Time Warner in conspiracy over the iViewit Technology. Counter-Defendant Proskauer Rose, Bruces Sewell of Apple and Time Warner had nothing to do with WIPO Case Case No. D2012-1525.

Sole Panelist Counter-Defendant Peter L. Michaelson brings up this point in order to attempt to protect those involved in the iViewit Technology theft in which Sole Panelist Counter-Defendant Peter L. Michaelson is in conspiracy and serious conflict of interest with. Why name Proskauer Rose, Counter-Defendant Bruce Sewell of Apple and Time Warner in a decision for a Domain Name regarding a Porn Industry Attorney named Marc Randazza and Domain Names owned by Investigative Blogger Counter Plaintiff Crystal L. Cox and iViewit Founder / Inventor Eliot Bernstein.

Sole Panelist Counter-Defendant Peter L. Michaelson used a New York Times article as Investigative Fact to Convict Defendant Eliot Bernstein and Counter Plaintiff Crystal Cox of extortion in WIPO Decision.

Counter-Defendant David Carr of the New York Times wrote an article called, "When Truth Survives Free Speech". This is an "Opinion" of a journalist for the Counter-Defendant New York Times. It is not fact and has many false accusations and information. Sole Panelist Counter-Defendant Peter L. Michaelson references this article in his defamatory, criminal WIPO Decision. An "article" in the New York Times, used as FACT in a decision for Intellectual Property Rights is not based in fact or in law. And in fact, is unlawful, illegal and WIPO is liable for his actions in this matter.

In my WIPO Complaint Response, I provided documentation to the FACT that there was no Extortion charges against me. I Provided eMail Communication between Attorney Marc Randazza and myself Counter-Plaintiff Crystal Cox. I even provided the WIPO Panelist with a Copy of an eMail from Marc Randazza to Counter-Plaintiff Crystal Cox, stating that he would represent me in my Appeal of Obsidian Finance Group V. Crystal Cox.

Sole Panelist Counter-Defendant Peter L. Michaelson deliberately ignored my proof, my documents of facts, and simply went on the stated the word of Complainant, Porn Attorney Marc Randazza.

Sole Panelist Counter-Defendant Peter L. Michaelson then went so far as to accuse me of a serious crime in a worldwide published WIPO Decision This is Illegal and WIPO is liable.

WIPO is not a Criminal Investigation Court and has no right to accuse me of a Crime in Published WIPO Decisions. In doing so, Sole Panelist Counter-Defendant Peter L. Michaelson has committed a Crime and has defamed me seriously. This has also caused me severe damage and backlash. I demand that WIPO publish a retraction of this Decision in no less than 3 major Media Outlets. And that WIPO retract this Defamatory, Criminal WIPO Decision.

Counter-Defendant Peter L. Michaelson has acted in conspiracy with Porn Attorney Counter-Defendant Marc Randazza in inciting Hate against Blogger Crystal Cox whom Marc Randazza was my attorney for a short time, and whom I Fired for acting unethically. Peter L. Michaelson has not reviewed the facts of this case, and instead Counter-Defendant Peter L. Michaelson has stated that Crystal Cox and Eliot Bernstein are guilty of Extortion.

Counter-Defendant WIPO showed extreme discrimination, prejudice and special favors to Marc Randazza throughout the process. Counter-Defendant WIPO even let Marc Randazza add several domain names to the WIPO complaint, BEFORE he even paid a filing fee. I demand that there be a special investigations of all emails from WIPO to Marc Randazza, from Counter-Defendant Peter L. Michaelson to Counter-Defendant Marc Randazza, and a thorough examination of all documentation I submitted proving my case and that there was no extortion charges against me.

In WIPO Decision Case No. D2012-1525, Counter-Defendant Peter L. Michaelson states:

"Respondent's actions in registering and using the disputed domain names may appear, at a first glance, to simply be a vehicle through which she provides advertising through pay-per-click sites, but on slightly closer examination are actually components of an artifice intended to extort funds from the Complainant and thus a pretext for a rather egregious variant of cybersquatting. As such, none of those actions can or will serve as a predicate upon which the Respondent can lawfully develop any rights or legitimate interests in any of the disputed domain names."

Sole WIPO Panelist Counter-Defendant Peter L. Michaelson flat out lies in saying these sites are pay per click that I receive revenue from. I have not received revenue from disputed names. Any ads placed on said Domain Names were places by the Registrar, Counter-Defendant Godaddy, and the Revenue was taken by Counter-Defendant Godaddy and NOT Respondent.

Sole WIPO Panelist Counter-Defendant Peter L. Michaelson commits fraud and defamation in saying that Domain Names are “actually components of an artifice intended to extort funds from the Complainant”. WIPO Panelist Peter L. Michaelson has no proof of Complainant being asked for money to remove blog post. WIPO Panelist Counter-Defendant Peter L. Michaelson has no proof of Complainant giving money to Respondent. WIPO Panelist Counter-Defendant Peter L. Michaelson has no proof what so ever of intention to “extort”. WIPO Panelist Counter-Defendant Peter L. Michaelson simply goes on the word of Unethical Porn Industry Attorney Counter-Defendant Marc J. Randazza.

WIPO Panelist Counter-Defendant Peter L. Michaelson States:

“the Respondent’s intention, as reflected by the record, was never to solely provide, through her websites, speech critical of the Complainant. Rather, her objective in both registering and using the disputed names was apparently to engage in a rather sinister and tenacious scheme to extort money from the Complainant.”

This is a flat out false statement. The record shows that I purchased MarcRandazza.com on the same day that I had a Phone Meeting with Counter-Defendant Marc Randazza regarding representing me in my Obsidian Finance Group V. Crystal Cox, high profile Free Speech Case I was taking to the Ninth Court of Appeals. I did not post one word on that Blog until months later when I FIRED Counter-Defendant Marc Randazza and he had conspired with opposing counsel to STOP me from going to the NINTH with my Appeal. My “objective” was to EXPOSE an unethical, hypocritical, lying, crooked attorney and to WARN others whom may have Marc Randazza do them what he did to me. I did not ask for money to remove information. In fact Marc Randazza offered to buy MarcRandazza.com and email records that xxx has seen, show that I rejected this offer and said that MarcRandazza.com was not for sale at ANY price. WIPO Panelist Counter-Defendant Peter L. Michaelson even saw an email where Respondent Marc Randazza says he did not mind me asking for a job, and that was the only reference of money that EVER Came UP. WIPO Panelist Peter L. Michaelson knows all of this and still Falsley accused me of Extortion in mass, high profile media.

WIPO Panelist Counter-Defendant Peter L. Michaelson States:

“Specifically, the Respondent first posted negative and false commentary on her websites that was intentionally calculated to injure the Complainant’s on-line reputation and disrupt the Complainant’s business conducted through his law firm. Thereafter, the Respondent used those sites in a manner that apparently optimized their ranking on the Google search engine in order to increase their visibility and prominence on search results yielded through a Google search of the Complainant, thus likely exacerbating the injury caused to the Complainant.”

Again WIPO Panelist Peter L. Michaelson flat out lies. I, Respondent posted “commentary” in order to expose Marc Randazza, to discuss my experience with Marc Randazza as an attorney. From there I got lots of tips, so I posted more information. WIPO Panelist Peter L. Michaelson has no reason to believe that the “commentary” is false. As it is true to the absolute best of my knowledge and information.

WIPO Panelist Peter L. Michaelson has no right to flat out state the commentary to be false, as it was NOT false. And it certainly was not posted to then Extort Money from Marc Randazza. This makes no logical sense and has no records of proof.

And of course I “optimized” my “sites” that is the point of the internet. I am Media, and I get the stories found strong in the search, that is the point of the INTERNET. It is not some sinister extortion plot. I asked for and I received NO money from Marc Randazza. IN fact, WIPO Panelist Peter L. Michaelson has seen emails where Marc Randazza asked that I pay his expenses in representing me.

WIPO Panelist Peter L. Michaelson flat out lies in stating that I “intentially calculated to injure Complainant”. I Intentionally wrote blog posts to expose what Counter-Defendant Marc Randazza had done to me, my experience with Marc Randazza and tips and information I had investigated and received regarding Counter-Defendant Marc Randazza and the Counter-Defendant Randazza Legal Group.

WIPO Panelist Counter-Defendant Peter L. Michaelson States

“Once all this occurred, the Respondent then offered her reputational management services to the Complainant through which, for a considerable fee, she would remediate the Complainant’s on-line reputation by eliminating all the negative and false commentary of her own making and presumably also ceasing her use of the disputed domain names. Basically, for a price, she would undo the injury to the Complainant for which she was responsible for having created in the first place. This egregious conduct clearly constitutes bad faith under the Policy."

WIPO Panelist Counter-Defendant Peter L. Michaelson has defamed Counter Plaintiff Crystal L. Cox and Defendant Eliot Bernstein, and Counter-Defendant Peter L. Michaelson has acted criminally in this statement as he falsely accused Counter Plaintiff Crystal L. Cox and Defendant Eliot Bernstein of criminal activity.

WIPO Panelist Counter-Defendant Peter L. Michaelson has seen emails and records that prove that did NOT offer to “remediate” anything for a fee. Counter Plaintiff Crystal L. Cox NEVER, EVER offered to eliminate any “commentary”. This is a flat out false, defamatory statement with malice as WIPO Panelist Counter-Defendant Peter L. Michaelson had the emails and records proving this untrue.

WIPO Panelist Counter-Defendant Peter L. Michaelson flat out lies hypothesizing in a WIPO decision that I claimed I would undo injury that I did for a fee. This is NOT True. I will NOT undo my blog posts for a price, and Counter Plaintiff Crystal L. Cox never offered Such. Counter Plaintiff Crystal L. Cox’s intention is to warn others potential clients on how dangerous and unethical that Counter-Defendant Marc Randazza and Counter-Defendant Randazza legal group is. Counter-Defendant Marc Randazza was acting as Counter Plaintiff Crystal L. Cox’s attorney. Counter Plaintiff Crystal L. Cox’s blogs are to review, complain expose her experience with Counter-Defendant Marc Randazza. There was no “price” offered. So WIPO Panelist Counter-Defendant Peter L. Michaelson saying that “Basically, for a price, she would undo the injury to the Complainant for which she was responsible for having created in the first place.” this again is defamatory and I Demand WIPO issue a Retraction in major media sources.

In WIPO Decision Case No. D2012-1525, Counter-Defendant Peter L. Michaelson discusses Counter-Defendant Marc Randazza's given name and "Mark". Yet no Trademark Documents applied or were filed. And Counter-Defendant Marc Randazza goes by MarcoRandazza on Twitter, YouTube and his username on his own blog. There is no ™ on Marc Randazza's Blog. And there was no proof given to WIPO of Marc Randazza's "given name" as I believe his birth name is Marco Randazza and not Marc Randazza. Also note that this Marc Randazza is not the only Marc Randazza in the world and should not have a right to steal this intellectual property as the only rightful owner in the world.

In WIPO Decision Case No. D2012-1525, Counter-Defendant Peter L. Michaelson States:

"Third, the Respondent attempted to commercially benefit from registration of these names by offering "reputation management" services to the Complainant – through baiting the Complainant into an extortionate scheme."

This is a flat out false claim, and is defamatory. Counter Plaintiff Crystal L. Cox did not bait the Complainant, in fact Counter-Defendant Marc Randazza entered Counter Plaintiff Crystal L. Cox life through channels other than herself. Counter-Defendant Marc Randazza wanted to be my attorney in the biggest First Amendment Case out there at this time, and got very angry when I fired him as my Attorney and instead chose UCLA Professor Eugene Volokh.

In WIPO Decision Case No. D2012-1525, Counter-Defendant Peter L. Michaelson States:

"Specifically, once the Complainant declined her "reputation management" services, the Respondent then registered domain names that contained not only the Complainant's surname, but also the personal names of his wife and three year old daughter, and then included falsehoods about the Complainant on her websites to which the domain names resolved."

This is false and defamatory. Counter Plaintiff Crystal L. Cox did not post falsehoods, nor did Counter Plaintiff Crystal L. Cox start blogs to post falsehoods because Counter-Defendant Marc Randazza refused to pay me. Counter Plaintiff Crystal L. Cox did not ask Counter-Defendant Marc Randazza to pay me to remove anything. Counter Plaintiff Crystal L. Cox's Blogs were to expose **Counter-Defendant** Marc Randazza. And there was NEVER a blog at the alleged domain of **Counter-Defendant** Marc Randazza's alleged daughter. **Counter-Defendant** Peter L. Michaelson flat out lied about . Counter Plaintiff Crystal L. Cox

Counter-Defendant Marc Randazza has Criminally and Civilly Conspired with Counter-Defendant Godaddy Inc., Counter-Defendant Bob Parsons, Counter-Defendant Jessica Griffin Godaddy Insider, and other John and Jane Doe's at Godaddy.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Godaddy Inc. and Counter-Defendant Bob Parsons Godaddy President are liable for the Damage they have done to me, and now to the Entire Domaining, Domain After Market, Domain Auctions, and Domain Name Industry. Counter-Defendant Marc Randazza Criminally and Civilly Conspires with Godaddy Inc., and Counter-Defendant WIPO in order to steal Domain Names.

Counter-Defendant Godaddy Inc. and Bob Parsons Godaddy President make pay per click, ad money from ads on domain names, Counter-Defendant Marc Randazza tells the courts and WIPO that the "Respondent" "Defendant" makes these ad dollars which is false. Counter Plaintiff Crystal L. Cox Godaddy Inc. and Bob Parsons Godaddy President sells domain names, customers such as Counter-PlaintiffCrystal Cox and Defendant Eliot Bernstein, pay for domain names, renew domain names year after year and built content, build value into these domain names. Then Counter-Defendant Marc Randazza, a Domain Name Law and Intellectual Property Attorney conspired criminally and civilly with Counter Plaintiff Crystal L. Cox Godaddy Inc. and Counter Plaintiff Crystal L. Cox Bob Parsons Godaddy President, and the Las Vegas Courts to simply take domain names, intellectual property and to redirect your internet traffic without due process and based solely on the unproven information given by Attorney Counter-Defendant Marc Randazza.

In 2005, Counter-Plaintiff Crystal Cox began giving Godaddy large amounts of business. I had met Godaddy at TRAFFIC West, a Domainer Trade Show Started by Rick Schwarts, the man who SOLD Men.com for 1.4 Million many years before. I also met the man who Sold Business.com for 7.5 Million and many other attorneys and industry insiders. I Liked Godaddy and thought them to have integrity, 7 years later my then partner and I have paid Godaddy hundreds of thousands of dollars in renewal fees and domain name renewals. In 2006, I believe we had around 70,000 domain names which would give Godaddy Inc. around $70,000 a year in domain name renewal fees. Now after 7 years of being a Godaddy Client and vast amount of Money, Referrals and Business I have given Godaddy. Counter Plaintiff Crystal L. Cox Godaddy has Criminally and Civilly conspired with Counter-Defendant Marc Randazza to lock, redirect, and flat out steal domain names with no due process to the Godaddy Client.

Counter-Defendant Marc Randazza has Criminally and Civilly Conspired with Counter-Defendant Tracy L. Coenen of SequenceInc.com

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza conspired Criminally and Civilly with Counter-Defendant SequenceInc.com, Counter-Defendant Tracy L. Coenen, Tracy Coenen to Paint Blogger Crystal Cox in False Light.

As seen In Exhibit T, In Criminal and Civil Conspiracy with Counter-Defendant Marc Randazza, Counter-Defendant Tracy L. Coenen has publicly accused Counter-Plaintiff Crystal Cox of Extortion. In Criminal and Civil Conspiracy with Counter-Defendant Marc Randazza, Counter-Defendant Tracy L. Coenen has defamed Counter-Plaintiff Crystal Cox.

In Criminal and Civil Conspiracy with Counter-Defendant Marc Randazza Counter-Defendant Tracy L. Coenen has Criminally and Civilly Endangered Counter-Plaintiff Crystal Cox.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, In Criminal and Civil Conspiracy with Counter-Defendant Marc Randazza Counter-Defendant Tracy L. Coenen has aided and abetted Counter-Defendant Marc Randazza to remove massive information regarding the iViewit Technology Theft. In Criminal and Civil Conspiracy with Counter-Defendant Marc Randazza Tracy L. Coenen has deliberately, with malice, painted Counter-Plaintiff Crystal Cox in false light so as to discredit Counter-Plaintiff Crystal Cox and the iViewit Technology story involving Liberty Media Holdings, Corbin Fisher, MPEG LA, Manwin and massive others.

Tracy L. Coenen has acted In Criminal and Civil Conspiracy with Counter-Defendant Marc Randazza, and AOL, AOLTW, Julie Jacobs, Tim Cook, John C. Malone and John and Jane Doe's to cover up information online regarding the involvement of AOL, AOLTW, in the iViewit Stolen Technology.

Co-Conspirator / Counter-Defendant Tracy L. Coenen know that AOL is involved in the iViewit Technology theft. Co-Conspirator as Counter-Defendant Tracy L. Coenen is a Fraud Specialist and worked for AOL's Financial Department. Counter-Defendant Tracy L. Coenen knows that AOL has been named in RICO Complaints, SEC Complaints, USPTO Complaints and massive legal actions regarding the iViewit Technology Theft.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Tracy L. Coenen has acted In Criminal and Civil Conspiracy with Counter-Defendant Marc Randazza, and AOL's Julie Jacobs, Time Warner, Liberty Holdings Media, Viacom, Ernst and Young, Arthur Anderson, Warner Bros., and other John and Jane Does in aiding and abetting massive shareholder fraud and in suppressing the iViewit Story and setting up, harassing, defaming, threatening and criminally endangering Blogger Counter-Plaintiff Crystal Cox who is exposing the iViewit Store LOUDLY in her online news media network, Anti-Corruption Media, Whistleblower Media, Investigative Blogs by Investigative Blogger Crystal L. Cox.

Counter-Defendant Marc Randazza has Criminally and Civilly Conspired with Counter-Defendant Ronald Green, Laura Tucker, Counter-Defendant Randazza Legal Group, "GERMANY GMBH", Counter-Defendant Manwin GERMANY GMBH, Manwin and Counter-Defendant Liberty Media in suppression of blogs regarding the iViewit Technology Case.

Ronald Green, Laura Tucker, Marc Randazza, Jennifer Randazza, and Randazza Legal Group are connected to **"GERMANY GMBH" -** Which is **Manwin GERMANY GMBH**, which is connected to Porn Wiki Leaks and Porn Industry illegal activity, financial schemes, human trafficking, harassment and intimidation rings, staged suicides, attempted murders, copyright schemes, stalker rings, porn industry hookers, and have known mafia and other organized crime connections.

Manwin GERMANY GMBH is a named Counter-Plaintiff in the iViewit SEC Complaint, iViewit RICO Complaint, and this is the main reason for Counter-Defendant Marc Randazza to attempt to silence Counter-Plaintiff Investigative Blogger Crystal L. Cox and iViewit Technology Founder and Inventor Eliot Bernstein.

Randazza Legal Group is out to protect Manwin GERMANY GMBH, as Manwin GERMANY GMBH owes iViewit Technologies Billions for over 11 years of knowingly infringing on the iViewit Video Technology

Counter-Defendant Marc Randazza has Criminally and Civilly Conspired with Counter-Defendant Tonkon Torp Law Firm, Counter-Defendant David S. Aman, Counter-Defendant Steven Wilker, Counter-Defendant Mike Morgan, Counter-Defendant Obsidian Finance Group, Counter-Defendant Kevin D. Padrick, Counter-Defendant Counter-Defendant Patricia Whittington, Counter-Defendant David W. Brown and Counter-Defendant Judge Marco Hernandez.

Counter-Defendant Marc J. Randazza is, and has been for over a year, acting in Civil and Criminal Conspiracy with Counter-Defendant Tonkon Torp Law Firm. Counter-Defendant Tonkon Torp Law Firm represented Enron in Bankruptcy Proceedings and Related Matter. Enron Collapsed, went bankrupt, due to Counter-Defendant Proskauer Rose Patent Lawyers and Enron's involvement in the Stealing of the iViewit Technology, of which Defendant Eliot Bernstein is the Founder and is one of the iViewit Video Technology Inventors.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Tonkon Torp Law Firm is counsel to Intel Corp. Portland who is named in iViewit SEC Complaints, RICO Complaints, USPTO Complaints and legal action regarding the stealing of the iViewit Technology. Tonkon Torp law firm has motive to suppress the iViewit Story in connection with protecting their clients.

Defendant Eliot Bernstein, is also a named Defendant on the Court Docket for Obsidian Finance Group Vs. Crystal Cox, Case Number CV-11-57-HZ U.S. District Court, District of Oregon, and Case 2:12-mc-00017-JPH Eastern District of Washington regarding Obsidian V. Cox. Eliot Bernstein is the Founder of iViewit Technologies and one of the Inventors of the iViewit Technology, which Counter-Defendant Marc Randazza and Counter-Defendant Tonkon Torp Law Firm are Criminally and Civilly Conspiring to Silence Information on.

Enron is named in iViewit, Eliot Bernstein, SEC Complaints, RICO Complaints, Criminal Complaints, and ALL of the Blogs of Counter-Plaintiff Investigative Blogger Crystal L. Cox report on the iViewit Technology Story and the involvement of Enron, Proskauer Rose Law Firm, MPEG LA, Arthur Anderson, Counter-Defendant Kenneth Rubenstein Patent Attorneys, Hon. Judith Kaye and thousands of others involved, named defendants and co-conspirators in the iViewit Technology Theft.

Tonkon Torp Law Firm, Counter-Defendant Mike Morgan and other John and Jane Doe's represented Enron and have civilly and criminally conspired with Counter-Defendant Marc Randazza to cover up Tonkon Torp's involvement in the Stealing of the iViewit Technology.

Counter-Defendant Marc J. Randazza is acting in Civil and Criminal Conspiracy with Tonkon Torp Law Firm regarding the suppressing of Investigative Blogger Crystal L. Cox exposing the documents, evidence, records of the iViewit Techology Theft as Seen at www.DeniedPatent.com, www.iVieiwit.tv, www.EthicsComplaints.com , www.BankruptcyCorruption.com , and all blogs listed in the attached Motion Entitled, **"Motion Requesting Preservation of Evidence**", of which these blogs in their entirety are evidence in this court case and must be printed out by this court in their entirety, as requested by Counter-PlaintiffCrystal Cox and in the best interest of shareholders and the public at large.

Counter-Defendant Marc J. Randazza is acting in Civil and Criminal Conspiracy with Tonkon Torp Law Firm and connections to CPA Firm Arthur Anderson, which is a named Counter-Plaintiff in the iViewit Case. CPA Firm Arthur Anderson's CPA Gary Stachlowski was the primary paid witness in the Obsidian V. Cox Case.

Counter-Defendant Marc Randazza and **Counter-Defendant** Tonkon Torp Law Firm are and have been Criminally and Civilly Conspiring to intimidate, harass, defame Counter-Plaintiff Crystal Cox in order to attempt to stop Counter-Plaintiff Crystal Cox from Appealing the Obsidian V. Cox Case. First, Counter-Defendant Marc Randazza and **Counter-Defendant** Tonkon Torp Law Firm, Attorney **Counter-Defendant** David Aman Criminally and Civilly Conspired regarding Receivership in the Obsidian V. Cox Case as Counter-Defendant Marc Randazza recommend a Las Vegas Attorney named Lara Pearson of the Rimon Law Group to be the Receiver in Obsidian V. Cox. Counter-Defendant Randazza did this in order to steal Domain Names such as MarcRandazza.com. Counter-Defendant Randazza had been out to sabotage Counter-Plaintiff Crystal Cox's Appeal from day one in order to suppress the iViewit Story, and protect his Porn Industry Clients such as **Counter-Defendant Manwin, Counter-Defendant Corbin Fisher, and Counter-Defendant Liberty Media Holdings.** .

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza and **Counter-Defendant** Tonkon Torp Law Firm, Attorney **Counter-Defendant** David Aman desperately want to STOP the Obsidian V. Cox Appeal, both have the agenda of removing Blogs in which expose the biggest Criminal Technology Case in the World, iViewit Technology. Of which both Counter-Defendant Marc Randazza and Tonkon Torp Law Firm, Attorney David Aman have motive to suppress. Counter-Defendant Marc Randazza represents Big Porn Industry Companies such as **Counter-Defendant** Manwin, **Counter-Defendant** Corbin Fisher and Others. Counter-Defendant Marc Randazza's clients knowingly use the iViewit Video Technology and have for over a decade. Counter-Defendant **Counter-Defendant** Marc Randazza's Clients owe Eliot Bernstein and the iViewit Inventors Hundreds of Millions of Dollars.

Counter-Defendant Marc Randazza and **Counter-Defendant** Tonkon Torp Law Firm, Attorney **Counter-Defendant** David Aman met with Judge Marco Hernandez and Criminally and Civilly Conspired in order to make me look like a Criminal Guilty of Extortion, when there was no proof of extortion, nor was Counter-Plaintiff Crystal Cox on Trial for Extortion. This Civil and Criminal Conspiracy led Judge Marco Hernandez to deny me a new trial, and to accuse me of extortion, a crime in a motion to deny a New Trial in a Civil Case.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza and **Counter-Defendant** Tonkon Torp Law Firm, Attorney **Counter-Defendant** David Aman Criminally and Civilly Conspired as recent as December 2012, as Counter-Defendant Marc J. Randazza, an expert in Florida Law, recently advised Tonkon Torp Lawyer David Aman how to filed documents in order to Seize my Assets, this Asset being My Right to Appeal Obsidian V. Cox. Counter-Defendant Marc Randazza and Tonkon Torp Law Firm, Attorney David Aman Criminally and Civilly Conspired for nearly a year now to STOP Counter-Plaintiff Crystal Cox's appeal.

If Counter-Plaintiff Cox wins the Obsidian V. Cox Appeal then iViewit Technology gets a bigger standing in "Media" and Counter-Defendant Marc Randazza and Co-Conspirator **Counter-Defendant** David Aman were sent in to sabotage the appeal to make sure this did not happen. All to cover up massive Criminal and Civil Conspiracy regarding the stealing of a 13 Trillion Dollar Video Technology of which Counter-Defendant Marc Randazza's Biggest Clients infringe upon every minute of every day.

Counter-Defendant Marc Randazza has Criminally and Civilly Conspired with Judge Gloria M. Navarro

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza is acting in Criminal and Civil Conspiracy with Judge Gloria M. Navarro and other co-conspirators to suppress information regarding the Stolen iViewit Technology.

Counter-Defendant Marc Randazza is acting in Criminal and Civil Conspiracy with **Counter-Defendant** Tonkon Torp Lawyer David S. Aman and Judge Marco Hernandez in torturously interfering with the outcome of my Case Obsidian V. Cox, of which Counter-Defendant Marc Randazza set out to sabotage the minute he heard of my verdict.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza is acting in Criminal and Civil Conspiracy with **Counter-Defendant** Tonkon Torp Lawyer David S. Aman in counselling Aman on who to get to take Counter-Plaintiff Crystal Cox's domain names in receivership. Counter-Defendant Marc Randazza told Attorney David S. Aman to use Las Vegas Attorney Lara Pearson of the Rimon Law Group who was the court-appointed receiver in the Righthaven Case.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza acted in Criminal and Civil Conspiracy with Tonkon Torp Lawyer David S. Aman, Attorney Lara Pearson, and Rimon Law Group to take domain names, suppress free speech, remove my blogs, and remove information regarding the iViewit Technology Story. Counter-Defendant Marc Randazza acted in Criminal and Civil Conspiracy with Judge Gloria M. Navarro who made the ruling regarding Righthaven, Receiver Lara Pearson and the liquidation of Righthaven assets to pay Attorney Marc Randazza, as seen in Exhibit P.

Counter-Defendant Marc Randazza has Criminally and Civilly Conspired with Sean Tomkins, Counter-Defendant J. Malcom Devoy, Randazza Legal Group, Corbin Fisher, Michael Fattorosi, and John and Jane Doe's to harass Industry Whistleblowers Monica Foster aKa Alex Melody and Desi Foxx aKa Diana Grandmason, named in Counter-Defendant Marc Randazza's complaint against his ex-client, Investigative Blogger, Whistleblower, Counter-Plaintiff Crystal Cox.

Monica Foster aKa Alex Melody and Desi Foxx aKa Diana Grandmason have written on the iViewit Technology. Monica Foster aKa Alex Melody has interview Counter-PlaintiffCrystal Cox and iViewit Inventor and Founder Counter-Plaintiff Eliot Bernstein. Counter-Defendant Marc Randazza has Criminally and Civilly Conspired to SILENCE Monica Foster aKa Alex Melody in whatever way necessary.

Counter-Defendant Marc Randazza has Criminally and Civilly Conspired with Stephen Media, Todd Kinnicann, Counter-Defendant Kenneth P. White, Jordan Rushie, Brown White and Newhouse, Counter-Defendant PopeHate.com, AboveTheLaw.com, Counter-Defendant Forbes, and and John and Jane Doe's in order to create a media falsehood to win cases, affect settlement, control clients, trick clients, and to shut down the blogs of Investigative Blogger Crystal L. Cox exposing the Ivewit Technology Story and Blowing the Whistleblower on Counter-Defendant Marc Randazza and his co-conspirators.

Counter-Defendant Marc Randazza has Criminally and Civilly Conspired with Counter-Defendant Stephen Media, Todd Kinnicann, Hustler, Evil Angel, Zero Tolerance, Red Light District, Counter-Defendant Liberty Media Holdings, Counter-Defendant Corbin Fisher, Playboy, John Malone, Sean Tompkins, Counter-Defendant J. Malcom Devoy, Jordan Rushie, Kenneth P. White, Viacom, Manwin, Manwin Fabian Thylmann, Vasilis Kailis, AVN.com, BitTorrent, Porn Wiki Leaks, Counter-Defendant Forbes, Counter-Defendant Kashmir Hill, Counter-Defendant Siouxielaw.com, Counter-Defendant Jason Jones Salty Droid, Counter-Defendant Eric Turkewitz, Counter-Defendant Scott H. Greenfield, Counter-Defendant Carlos Miller, Counter-Defendant Tracy L. Coenen, Counter-Defendant Mulvihill and Rushie LLC, Jeremy Steele, and John and Jane Doe's in order to shut down competing websites and blogs. And to harass, intimidate, defame, threaten, criminally endanger

those who blow the whistle on them, expose them and stand up to them.

Counter-Defendant Marc Randazza has Criminally and Civilly Conspired with MPEG LA, Counter-Defendant Liberty Media Holdings, Counter-Defendant Corbin Fisher, Counter-Defendant Godaddy Inc., Counter-Defendant Peter L. Michaelson, Kenneth Rubenstein, Proskauer Rose Law Firm in suppressing / removing the iVewit Technology story in connection to Counter-Defendant Marc Randazza and his clients Corbin Fisher, Liberty Media, John C. Malone, ATT, Time Warner Inc. using the iViewit Technology and owing iViewit Technology and Defendant Eliot Bernstein Billions of Dollars.

Counter-Defendant Marc Randazza has Criminally and Civilly Conspired with Counter-Defendant David S. Aman of Tonkon Torp Law Firm and Counter-Defendant David Carr of the New York Times.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, Counter-Defendant David Carr of the New York Times wrote an article defaming Counter-Plaintiff Crystal Cox, painting me in false light, accusing me of extortion falsely and in this article, in criminal and civil conspiracy with Counter-Defendant Proskauer Rose, Counter-Defendant Marc Randazza, Warner Bros. Jeffrey Bewkes and other John and Jane Does, Counter-Defendant David Carr mentions the Investigative Blogs of Counter-Plaintiff Crystal Cox in regard to the iViewit Technology Story and Defendant Eliot Bernstein. Counter-Defendant David Carr of the Counter-Defendant New York Times deliberately defamed Counter-Plaintiff Crystal Cox in Order to Suppress the iViewit Story for and with Co-Conspirators. Counter-Defendant Marc Randazza has Criminally and Civilly Conspired with Counter-Defendant David Carr, and continues to promote the defamatory article painting Counter-Plaintiff Crystal Cox in false light, criminally endangering Counter-Plaintiff Crystal Cox, and defaming Counter-Plaintiff Crystal Cox.

Counter Plaintiff Crystal L. Cox has suffered irreparable damage personally and professionally. Wherefore, Counter Plaintiff Crystal L. Cox demands a judgment against Each Co-Conspirator, Each Counter Defendant for actual and punitive damages, and all other relief allowable under the law and federal court rules. Counter Defendants did the things here in maliciously and to oppress counter plaintiff Crystal Cox. Counter Plaintiff Crystal Cox is therefore entitled to all exemplary and punitive damage allowed by Law.

Second Cause of Action
Defamation

Counter Plaintiff Crystal L. Cox re-alleges all of the preceding paragraphs
and fully incorporates all of the preceding paragraphs

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox,Counter-Defendant Marc Randazza, Counter-Defendant Kashmir Hill, Counter-Defendant Forbes Inc., Counter-Defendant SequenceInc.com Tracy L. Coenen, Counter-Defendant Mark Bennett blog.BennettandBennett.com, Bennett and Bennett, Carlos Miller, Eric Turkewitz of Turkewitz Law Firm and NewYorkPersonalInjuryAttorneyBlog.com, Counter-Defendant Scott H. Greenfield of Simple Justice - a New York Criminal Defense Blog and blog.simplejustice.us, Counter-Defendant Carlos Miller of PixlQ.com and PhotographyisNotaCrime.com, Counter-Defendant Roxanne Grinage, Counter-Defendant HireLyrics, Counter-Defendant David Carr, Counter-Defendant New York Times, Counter-Defendant New York Public Radio, Counter-Defendant Bob Garfield, Counter-Defendant NPR, Counter-Defendant Janine Robben Oregon State Bar Bulletin, Counter-Defendant Leo Mulville and John and Jane Doe's, have intentionally, with malice defamed Counter Plaintiff Crystal L. Cox in mass media, blogs and radio, legal briefs, publications, and have intimidated, harassed, threatened and caused extreme duress and loss of business to Counter Plaintiff Crystal L. Cox, and have committed a Hate Crime against Counter Plaintiff Crystal L. Cox and endangered her, my life.

Counter Plaintiff Crystal L. Cox re-allege and incorporate the preceding paragraphs.
Counter Defendants, as listed above have engaged in an online harassment and defamation campaign to intimidate, defame, and paint Counter Plaintiff Crystal L. Cox and to discredit the iViewit Technology Story.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, On numerous occasions, Counter-Defendants Kashmir Hill, ForbesInc., Counter Defendant SequenceInc.com, Counter Defendant Tracy L. Coenen, Counter Defendant Mark Bennett blog.BennettandBennett.com, Bennett and Bennett, Scott H. Greenfield, Carlos Miller, Eric Turkewitz of Turkewitz Law Firm and NewYorkPersonalInjuryAttorneyBlog.com, Scott H. Greenfield of Simple Justice - a New York Criminal Defense Blog and blog.simplejustice.us, Counter Defendant Carlos Miller of PixlQ.com and PhotographyisNotaCrime.com, Counter Defendant Roxanne Grinage, Counter Defendant HireLyrics, Counter Defendant David Carr, Counter Defendant New York Times, Counter Defendant New York Public Radio, Counter Defendant Bob Garfield, Counter Defendant NPR, Counter Defendant Peter L. Michaelson, WIPO, Counter Defendant Marc J. Randazza, the Legal Satyricon, David S. Aman, Tonkon Torp Law Firm and John and Jane Doe's, have publicly defamed, lied about, blogged about Counter Plaintiff Crystal L. Cox and accused Crystal Cox of Extortion, this has caused the businesses of

Counter Plaintiff Crystal Cox to suffer, the quality of life of Counter Plaintiff Crystal Cox to suffer, and caused irreparable damage to Counter Plaintiff Crystal Cox.

Upon knowledge, information and belief of Counter Plaintiff Crystal Cox, On numerous occasions Counter Defendant(s), Marc Randazza, the Legal Satyricon, Jordan Rushie of Mulvihill and Rushie LLC Philly Law Blog, Brown White $ Newhouse, Kenneth P. White, Popehat.com, Eric Turkewitz - Turkewitz Law Firm and NewYorkPersonalInjuryAttorneyBlog.com, Scott H. Greenfield of Simple Justice - a New York Criminal Defense Blog, Mark Bennett blog.bennettandbennett.com, Bennett and Bennett, Scott H. Greenfield, Bob Garfield of NPR, Janine Robben Oregon State Bar Bulletin, David Carr of the New York Times, Kashmir Hill of Forbes and other John and Jane Doe have published false statements about Counter Plaintiff Crystal Cox.

These accusations of Extortion in multiple blogs in defamatory conspiracy were calculated, orchestrated among co-conspirators and deliberately malicious. The Co-Conspirators, counter defendants as listed above have no credible or accurate source, nor do they reference a credible or accurate souce as to the Counter Plaintiff Crystal L. Cox being guilty of Extortion. They simply maliciously defame Counter Plaintiff Crystal Cox, and paint Counter Plaintiff Crystal Cox in false light, maliciously, knowing full well that Counter Plaintiff Crystal Cox has not been charged with extortion in a court of law.

Counter Defendants David S. Aman, Tonkon Torp Law Firm, New York Times, David Carr, Forbes Inc. Kashmir Hill Co-Conspired Criminally and Civilly in mass producing an email that I sent Opposing Counsel in my Pro Se Capacity, after a legal threat was sent and after a 10 Million Dollar Lawsuit was filed against me, it was one email out of 5, and taken out of context, and was a Settlement Negotiation to attempt to stop a lawsuit. They made this email look like I was extorting Tonkon Torp Lawyers and Obsidian Finance Group and this is not based in any fact, it was deliberate defamation and sabotage.

Counter Defendants David S. Aman of Tonkon Torp Law Firm defamed Plaintiff Crystal Cox in giving an eMail to New York Times Reporter David Carr and falsely told David Carr of the New York Times that Counter Plaintiff Crystal L. Cox had extorted him and his client Obsidian Finance Group, when in fact Counter Plaintiff Crystal L. Cox was not guilty of extortion, was not on trial for the crime of extortion, extortion was no part of the Obsidian V. Cox case, Counter Plaintiff Crystal L. Cox did not have a complaint against her for extortion, nor was there a criminal investigation into extortion regarding Counter Plaintiff Crystal L. Cox. The email Counter Defendants David S. Aman of Tonkon Torp Law Firm sent to David Carr of the New York Times was, with actual malice, sent out of context and was in fact part of 5 eMails between Counter Plaintiff Crystal L. Cox, her my Pro Se Capacity and Opposing Counsel David S. Aman of Tonkon Torp Law Firm, which were a Settlement Negotiation to negotiate an ending to David S. Aman's client Obsidian Finance Group's Lawsuit against Counter Plaintiff Crystal L. Cox.

These Settlement Negotiations were after a 10 Million Dollar Lawsuit had been filed by Opposing Counsel David S. Aman of Tonkon Torp Law Firm against Counter Plaintiff Crystal L. Cox. The Defaming eMail that David Carr of the New York Times and Forbes Inc. Kashmir Hill use to defame Counter Plaintiff Crystal L. Cox, is dated January 19th 2011, which was after a Cease and Desist (Lawsuit Threat) was sent and received and after Obsidian Finance Group LLC. vs Crystal Cox was filed. David S. Aman, Tonkon Torp Law Firm, David Carr of the New York Times and Forbes Inc. Kashmir Hill as well as other John and Jane Doe co-defendants, co-conspirators accused me of the Crime of Extortion in National Media and have caused irreparable harm, stress and damage to Counter Plaintiff Crystal L. Cox. These statements are untruthful, harmful, disparaging, defamatory, and false statements about Counter Plaintiff Crystal L. Cox.

Counter Plaintiff Crystal L. Cox is a Real Estate Broker Owner, and has been for over a Decade. Counter Plaintiff Crystal L. Cox makes a living online by marketing nutritional supplements. Counter Plaintiff Crystal L. Cox is an Investigative Blogger and does contract work to perform online internet investigation services. Counter Plaintiff Crystal L. Cox is an SEO Marketing Expert. Counter Plaintiff Crystal L. Cox writes and sells books online. Counter Plaintiff Crystal L. Cox takes photographs and sells them online.

Counter Defendants and Co-Conspirators re-alleged from all preceding paragraphs, have irreparably damaged the livwlihood and quality of life of Counter Plaintiff Crystal L. Cox

Counter Plaintiff Crystal L. Cox has suffered irreparable damage personally and professionally. Wherefore, Counter Plaintiff Crystal L. Cox demands a judgment against Each Co-Conspirator, Each Counter Defendant for actual and punitive damages, and all other relief allowable under the law and federal court rules.

Third Cause of Action
Harassment

Counter Plaintiff Crystal L. Cox re-alleges and fully incorporates all of the preceding paragraphs.

Counter-Defendant Marc Randazza has Criminally and Civilly conspired will all listed known and un-known co-conspirators / counter defendants to harass and intimidate Counter Plaintiff Crystal L. Cox.

Counter Plaintiff Crystal L. Cox has suffered irreparable damage personally and professionally. Wherefore, Counter Plaintiff Crystal L. Cox demands a judgment against Each Co-Conspirator, Each Counter Defendant for actual and punitive damages, and all other relief allowable under the law and federal court rules.

Fourth Cause of Action
Violation of Anti-Trust Laws / Fair Trade Laws
Fair Competition Act (FCA), The Sherman Antitrust Act (1890),
Antitrust Policy and Competition Law

Counter Plaintiff Crystal L. Cox re-alleges and fully incorporates the preceding paragraphs.

Counter-Defendant Marc Randazza has violated anti-trust, fair competition laws and fair trade laws. Counter-Defendant Marc Randazza with the aid of this court, has removed thousands of competing internet links and dozens of domain names, as well as dozens of blogs. This is a violation of anti-trust, fair competition laws and fair trade laws and gives Counter-Defendant Marc Randazza and Counter-Defendant Randazza Legal Group an unfair advantage.

Counter Plaintiff Crystal L. Cox has suffered irreparable damage personally and professionally. Wherefore, Counter Plaintiff Crystal L. Cox demands a judgment against Each Co-Conspirator, Each Counter Defendant for actual and punitive damages, and all other relief allowable under the law and federal court rules.

Laws governing fair competition are designed to maintain a competitive marketplace and Counter Defendant Marc Randazza wants this court to eliminate the competitive marketplace for search terms related to his business and line of work. This is unlawful. And this court has already given Counter Plaintiff Marc Randazza an unfair advantage in the marketplace, and without due process given to Counter Plaintiff Crystal Cox or Defendant Eliot Bernstein.

Antitrust laws seek to make businesses compete fairly. Marc Randazza wishes the courts to violate Antitrust law and give Marc Randazza an unfair advantage by suppressing competition in the search engines.

Fifth Cause of Action
Violation of First Amendment, Constitutional Rights

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Counter Plaintiff Crystal L. Cox re-alleges all of the preceding paragraphs
and Fully incorporates all of the preceding paragraphs.

Counter-Defendant Marc Randazza and Co-Conspirators and Counter Defendants
Have Violated the First Amendment Rights of Counter Plaintiff Crystal L. Cox and Defendant Eliot Bernstein, as well as associated Investigative Bloggers Monica Foster aKa Alex Melody and Desi Foxx aKa Diana Grandmason.

This Court has Denied Counter Plaintiff Crystal L. Cox Due Process and erred when it issued an

impermissible prior restraint when it issued a preliminary injunction against future speech, and seized intellection property, content, blogs and domain names of Counter Plaintiff Crystal Cox.

This Court has Denied Counter Plaintiff Crystal L. Cox Due Process and erred when it issued a preliminary injunction against tortious interference, when as a matter of law, the tortious interference claim must fail. **Counter-Defendant** Marc Randazza has tortiously interfered with Counter Plaintiff Crystal Cox's business, news media, blogs, and online content.

This Court has Denied Counter Plaintiff Crystal L. Cox Due Process and erred when it issued a preliminary injunction denying Defendant Crystal Cox her right to Free Speech.

The essence of a prior restraint is that it places First Amendment protected speech under the personal censorship of one judge. (Bernard v. Gulf Oil Co., 619 F.2d 459, 486 (5th Cir. 1980) (State v. Globe Commc'ns, Corp., 622 So.2d 1066, 1073, (Fla. 4th DCA 1993), aff'd 648 So. 2d 110 (Fla. 1994)

This Court has Denied Counter Plaintiff Crystal L. Cox Due Process and erred when it issued an unlawful prior restraint. Such an injunction imposed unlawful prior restraint of speech, violating the First Amendment, with no constitutionally permissible justification. The Order represents an impermissible restraint on speech and was unjustified based on the evidence. The injunction is a content based restriction on speech, and thus must overcome strict scrutiny in order to stand. There is no "compelling state interest" at issue in this case. The injunction has a fatal condition. (Bantam Books, Inc. v. Sullivan 372 U.S. 58 (1963) (Organization for a Better Austin v. Keefe, 402 U.S. 415 (1971) The Supreme Court Struck down the injunction as "an impermissible restraint on First Amendment rights" Id at 417018, 418 n.I. In invalidating the prior restraint, the Court wrote, "no prior decisions support the claim that the interest of an individual in being free from public criticism of his business practises in pamphlets, or leaflets warrants the injunctive power of the court." Id at 419.

The Preliminary Injunction in this Case against Counter Plaintiff Crystal L. Cox is Unconstitutional.

If a court issues an injunction prior to adjudicating the First Amendment Protection of the speech at issue, the injunction cannot pass constitutional muster.

This court denied Counter Plaintiff Crystal L. Cox Due Process in expressly skipping the essential step of adjudicating the First Amendment protections to the speech at issue.

This court denied Counter Plaintiff Crystal L. Cox Due Process in failing to make any findings of fact or ruling of law, much less review of the blog articles and the First Amendment. Counter-Defendant Marc Randazza is a Public Figure. (New York Times Vs. Sullivan)

A Judicial Order that prevents free speech from occurring is unlawful. (Erwin Chemerinsky,

Constitutional Law; Principles and Policies 918 (2002) (“The Clearest definition of prior restraint is.. a judicial order that prevents speech from occurring:).

Prior Restraints are “the most serious and least tolerable infringement on First Amendment Rights.” Neb. Press Ass’n v. Stewart, 427 U.S. 539, 559 (1976). There is a “deep-seated American hostility to prior restraint” Id at 589 (Brennan, J. concurring).

Injunctive relief to prevent actual or threatened damage is heavily disfavored because it interferes with the First Amendment and amounts to censorship prior to a judicial determination of the lawlessness of speech. See Moore v. City Dry Cleaners & Laundry, 41 So. 2d 865, 872 (Fla. 1949). “The special vice of prior restraint,” the Supreme Court held, “is that communication will be suppressed... before an adequate determination that it is unprotected by the First Amendment”. Pittsburgh Press Co v. Pittsburg Comm’n on Human Relations, 413 U.S. 376, 390 (1973). Also se Fort Wayn Books Inc. v Indiana, 489 U.S. 46, 66 (1989); M.I.C., Ltd v Bedford Township, 463 U.S. 1341, 11343 (1983.)

In this case, the Nevada Court has skipped the step of adjudicating the First Amendment protection relevant to the speech at issue. Prior Restraints are Unconstitutional.

Also see Post-Newswek Stations Orlando, Inc. v. Guetzlo.

“RKA sought extraordinary relief in the form of prior restraint to enjoin .. . This relief is not recognized in this State, nor anywhere else in the Country. In addition to ignoring the First Amendment Rights and almost a century’s worth of common law, the .. court ignored virtually all procedural requirements for the issue of a preliminary injunction.” Page 5 Paragraph ii of Opening Brief Appellate Case No. 3D12-3189, Irina Chevaldina Appellant vs. R.K./FI Management Inc.;et.al., Appellees. Attorney for Appellant Marc J. Randazza Florida Bar No. 325566, Randazza Legal Group Miami Florida. This case is now hereby referenced herein, in it’s entirety.

Counter Plaintiff Crystal L. Cox has suffered irreparable damage personally and professionally. Wherefore, Counter Plaintiff Crystal L. Cox demands a judgment against Each Co-Conspirator, Each Counter Defendant for actual and punitive damages, and all other relief allowable under the law and federal court rules.

Sixth Cause of Action
Violation of Due Process /Denial of Due Process

Counter Plaintiff Crystal L. Cox re-allege and fully incorporate the preceding paragraphs.

On Belief and Knowledge of Counter Plaintiff Crystal Cox, **Judge Gloria M. Navarro** is acting in criminal and civil conspiracy with Counter-Defendant Marc Randazza, **Counter-Defendant** Randazza Legal Group, **Counter-Defendant** Ron Green, Laura Tucker and Godaddy to steal intellectual property of Counter-Plaintiff Crystal Cox and Defendant Eliot Bernstein with no due process.

On Belief and Knowledge of Counter Plaintiff Crystal Cox, Judge Gloria M. Navarro is acting in criminal and civil conspiracy with **Counter-Defendant Marc Randazza, Randazza Legal Group, Counter-Defendant Ron Green, Laura Tucker** to remove thousands of blog posts forever from the Internet Search Engines Regarding Whistlblower about Counter-Defendant Marc Randazza and **Counter-Defendant** Randazza Legal Group and the iViewit Technology Story.

On Belief and Knowledge of Counter Plaintiff Crystal Cox, This Court has Denied Counter Plaintiff Crystal L. Cox Due Process and erred when it issued an impermissible prior restraint when it issued a preliminary injunction against future speech, and seized intellection property, content, blogs and domain names of Counter Plaintiff Crystal Cox.

This Court has Denied Counter Plaintiff Crystal L. Cox Due Process and erred when it issued a preliminary injunction against tortious interference, when as a matter of law, the tortious interference claim must fail. **Counter-Defendant** Marc Randazza has tortiously interfered with Counter Plaintiff Crystal Cox's business, news media, blogs, and online content.

This Court has Denied Counter Plaintiff Crystal L. Cox Due Process and erred when it issued a preliminary injunction in which has caused irreparable harm, when there was an adequate remedy at law, when there was no likelihood of success on the merits, and without considering the public interest?

This Court has Denied Counter Plaintiff Crystal L. Cox Due Process and erred when it issued a preliminary injunction against invasion of privacy without the requisite showings required to enter a preliminary injunction.

This Court By Law must cure an unlawful prior restraint.

Counter-Defendant Marc Randazza sued Counter Plaintiff Crystal Cox for Exercising her First Amendment Rights

This Court has Denied Defendant Crystal Cox Due Process and erred when it issued a preliminary injunction that was over-broad, subject to abuse and has caused Counter Plaintiff Crystal Cox irreparable financial damage and suffering.

This Court has Denied Counter Plaintiff Crystal L. Cox Due Process and erred when it issued a preliminary injunction denying Defendant Crystal Cox her right to Free Speech.

The essence of a prior restraint is that it places First Amendment protected speech under the personal censorship of one judge. (Bernard v. Gulf Oil Co., 619 F.2d 459, 486 (5th Cir. 1980) (State v. Globe Commc'ns, Corp., 622 So.2d 1066, 1073, (Fla. 4th DCA 1993), aff'd 648 So. 2d 110 (Fla. 1994)

This Court has Denied Counter Plaintiff Crystal L. Cox Due Process and erred when it issued an unlawful prior restraint. Such an injunction imposed unlawful prior restraint of speech, violating the First Amendment, with no constitutionally permissible justification. The Order represents an impermissible restraint on speech and was unjustified based on the evidence. The injunction is a content based restriction on speech, and thus must overcome strict scrutiny in order to stand. There is no "compelling state interest" at issue in this case. The injunction has a fatal condition. (Bantam Books, Inc. v. Sullivan 372 U.S. 58 (1963) (Organization for a Better Austin v. Keefe, 402 U.S. 415 (1971) The Supreme Court Struck down the injunction as "an impermissible restraint on First Amendment rights" Id at 417018, 418 n.I. In invalidating the prior restraint, the Court wrote, "no prior decisions support the claim that the interest of an individual in being free from public criticism of his business practises in pamphlets, or leaflets warrants the injunctive power of the court." Id at 419.

The Preliminary Injunction in this Case against Counter Plaintiff Crystal L. Cox is Unconstitutional.

If a court issues an injunction prior to adjudicating the First Amendment Protection of the speech at issue, the injunction cannot pass constitutional muster.

This court denied Counter Plaintiff Crystal L. Cox Due Process in expressly skipping the essential step of adjudicating the First Amendment protections to the speech at issue.

This court denied Counter Plaintiff Crystal L. Cox Due Process in failing to make any findings of fact or ruling of law, much less review of the blog articles and the First Amendment. **Counter-Defendant** Marc Randazza is a Public Figure. (New York Times Vs. Sullivan)

A Judicial Order that prevents free speech from occurring is unlawful. (Erwin Chemerinsky, Constitutional Law; Principles and Policies 918 (2002) ("The Clearest definition of prior restraint is.. a judicial order that prevents speech from occurring:).

Prior Restraints are "the most serious and least tolerable infringement on First Amendment

Rights." Neb. Press Ass'n v. Stewart, 427 U.S. 539, 559 (1976). There is a "deep-seated American hostility to prior restraint" Id at 589 (Brennan, J. concurring).

Injunctive relief to prevent actual or threatened damage is heavily disfavored because it interferes with the First Amendment and amounts to censorship prior to a judicial determination of the lawlessness of speech. See Moore v. City Dry Cleaners & Laundry, 41 So. 2d 865, 872 (Fla. 1949). "The special vice of prior restraint," the Supreme Court held, "is that communication will be suppressed... before an adequate determination that it is unprotected by the First Amendment". Pittsburgh Press Co v. Pittsburg Comm'n on Human Relations, 413 U.S. 376, 390 (1973). Also se Fort Wayn Books Inc. v Indiana, 489 U.S. 46, 66 (1989); M.I.C., Ltd v Bedford Township, 463 U.S. 1341, 11343 (1983.)

In this case, the Nevada Court has skipped the step of adjudicating the First Amendment protection relevant to the speech at issue. Prior Restraints are Unconstitutional.

Also see Post-Newswek Stations Orlando, Inc. v. Guetzlo.

"RKA sought extraordinary relief in the form of prior restraint to enjoin .. . This relief is not recognized in this State, nor anywhere else in the Country. In addition to ignoring the First Amendment Rights and almost a century's worth of common law, the .. court ignored virtually all procedural requirements for the issue of a preliminary injunction." Page 5 Paragraph ii of Opening Brief Appellate Case No. 3D12-3189, Irina Chevaldina Appellant vs. R.K./FI Management Inc.;et.al., Appellees. Attorney for Appellant Marc J. Randazza Florida Bar No. 325566, Randazza Legal Group Miami Florida. This case is now hereby referenced here in, in it's entirety.

I, Pro Se Counter Plaintiff Crystal L. Cox request this court print all listed blogs, websites as evidence in this case. Counter-Defendant Marc Randazza, in Criminal and Civil Conspire with this court, Counter-Defendant Godaddy and a Ring of Bloggers, Attorneys, and Journalists, have removed a mass amount of my investigative blogs regarding the iViewit Technology Story and the involved of Counter-Defendant Marc Randazza. I, Pro Se Counter Plaintiff Crystal L. Cox request this court print all pages of all blogs listed and file with this case as exhibits, in order to preserve evidence, the record and safeguard the public at large.

Due to this court acting to remove these evidentiary blogs and allowing Counter-Defendant Marc Randazza to change the content, it is imperative that this court print out all blogs listed, all links from blog posts, and every page and post of every blog as evidence of criminal and civil conspiracty. All links to blogs contained herein are fully incorporated by reference to the URL with all links and evidence within the main url. Each URL and all sublinks within each URL must be fully printed as well.

Counter Plaintiff Crystal L. Cox has suffered irreparable damage personally and professionally.

Wherefore, Counter Plaintiff Crystal L. Cox demands a judgment against Each Co-Conspirator, Each Counter Defendant for actual and punitive damages, and all other relief allowable under the law and federal court rules.

Seventh Cause of Action
Violation of Hate Crime Act/ Hate Crimes Prevention Act

Counter Plaintiff Crystal L. Cox re-allege and fully incorporates the preceding paragraphs.

On Belief and Knowledge of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza, Counter-Defendant Kenneth P. White, Counter Defendant Sean Boushie, and other Counter Defendants names and John and Jane Doe Counter Defendants have violated the **Hate Crimes Prevention Act**.

The Hate Crime Prevention Act, Title 18, U.S.C., Section 241, Conspiracy Against Rights statute makes it unlawful for two or more persons to conspire to injure, oppress, threaten, or intimidate any person of any state, territory or district in the free exercise or enjoyment of any right or privilege secured to him/her by the Constitution or the laws of the United States.

Counter Plaintiff Crystal L. Cox has suffered irreparable damage personally and professionally. Wherefore, Counter Plaintiff Crystal L. Cox demands a judgment against Each Co-Conspirator, Each Counter Defendant for actual and punitive damages, and all other relief allowable under the law and federal court rules.

Eighth Cause of Action
Abuse of Process

Counter Plaintiff Crystal L. Cox re-alleges and fully incorporates the preceding paragraphs.

On Belief and Knowledge of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza and Co-Conspirators and Counter Defendants Have maliciously and deliberately misused court process (civil and criminal), in which was not justified by underlying legal action.

On Belief and Knowledge of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza and Co-Conspirators and Counter Defendants had an ulterior purpose and motive underlying the use of process. Counter-Defendant Marc Randazza and Co-Conspirators and Counter Defendants had motive to used this court case to set a precedence in order for other Co-Conspirators and Counter Defendants, as well as Counter-Defendant Marc Randazza to delete blogs, steal intellectual property o Counter Plaintiff Crystal L. Cox, remove information regarding the iViewit Technology Story as exposed by Investigative Blogger Counter Plaintiff Crystal L. Cox, and to intimidate, defame, harass, cohearseand pressure Counter Plaintiff Crystal L. Cox into silencing,

shutting down blogs that expose Counter-Defendant Marc Randazza and Co-Conspirators and Counter Defendants.

Counter-Defendant Marc Randazza and his co-conspirators are desperate to silence Investigative Blogger Counter Plaintiff Crystal L. Cox and the iViewit Story. With this Slapp Lawsuit Counter-Defendant Marc Randazza has violated Abuse of Power Tort Law.

Counter-Defendant Marc Randazza has used the legal process to accomplish an unlawful purpose.

On Belief and Knowledge of Counter Plaintiff Crystal Cox, Counter-Defendant Marc Randazza and Co-Conspirators and Counter Defendants, with malice, have used the legal process improperly in the regular prosecution of the proceedings.

The principles which lead to a finding of an abuse of process in the UK were stated in Johnson v. Gore Wood & Co[4] by Lord Bingham.

“ “The underlying public interest is … that there should be finality in litigation and that a party should not be twice vexed in the same matter. This public interest is reinforced by the current emphasis on efficiency and economy in the conduct of litigation, in the interests of the parties and the public as a whole. The bringing of a claim or the raising of a defence in later proceedings may, without more, amount to abuse if the court is satisfied (the onus being on the party alleging abuse) that the claim or defence should have been raised in the earlier proceedings if it was to be raised at all. I would not accept that it is necessary, before abuse may be found, to identify any additional element such as a collateral attack on a previous decision or some dishonesty, but where those elements are present the later proceedings will be much more obviously abusive, and there will rarely be a finding of abuse unless the later proceeding involves what the court regards as unjust harassment of a party. It is, however, wrong to hold that because a matter could have been raised in earlier proceedings it should have been, so as to render the raising of it in later proceedings necessarily abusive. That is to adopt too dogmatic an approach to what should in my opinion be a broad, merits-based judgment which takes account of the public and private interests involved and also takes account of all the facts of the case, focusing attention on the crucial question whether, in all the circumstances, a party is misusing or abusing the process of the court by seeking to raise before it the issue which could have been raised before. As one cannot comprehensively list all possible forms of abuse, so one cannot formulate any hard and fast rule to determine whether, on given facts, abuse is to be found or not … Properly applied, and whatever the legitimacy of its descent, the rule has in my view a valuable part to play in protecting the interests of justice.” ”

Counter Plaintiff Crystal L. Cox has suffered irreparable damage personally and professionally. Wherefore, Counter Plaintiff Crystal L. Cox demands a judgment against Each Co-Conspirator, Each Counter Defendant for actual and punitive damages, and all other relief allowable under the law and federal court rules.

Ninth Cause of Action
Tortious Interference

Counter Plaintiff Crystal L. Cox re-allege and incorporate the preceding paragraphs.

Counter-Defendant Marc Randazza and Co-Conspirators and Counter Defendants Violated Tortious Interference Laws and have interfered tortiously with the business, future business, clients, customers, buyers of Plaintiff Crystal Cox's products and services.

Counter Plaintiff Crystal L. Cox is a Real Estate Broker Owner, and has been for over a Decade. Counter Plaintiff Crystal L. Cox makes a living online by marketing nutritional supplements. Counter Plaintiff Crystal L. Cox is an Investigative Blogger and does contract work to perform online internet investigation services. Counter Plaintiff Crystal L. Cox is an SEO Marketing Expert and is well known for being the best at what she does.

Counter-Defendant Marc Randazza and Co-Conspirators and Counter Defendants have interfered with me getting clients and business by accusing me of criminal activity Counter Plaintiff Crystal L. Cox am not guilty of, was not on trial for , nor have ever had a criminal complaint in regard to.

Counter-Defendant Marc Randazza and Co-Conspirators and Counter Defendants have maliciously lied about me, painted me in false light, defamed me, mobbed me, threatened me and attacked me in this public accusation.

Counter Plaintiff Crystal L. Cox has suffered irreparable damage personally and professionally. Wherefore, Counter Plaintiff Crystal L. Cox demands a judgment against Each Co-Conspirator, Each Counter Defendant for actual and punitive damages, and all other relief allowable under the law and federal court rules.

Tenth Cause of Action

Interference with Counter Plaintiff's Prospective Business Advantage

Counter Plaintiff Crystal L. Cox re-allege and fully incorporate the preceding paragraphs.

Counter-Defendant Marc Randazza and Co-Conspirators and Counter Defendants Have Interfered with Counter Plaintiff Crystal Cox's Prospective Business Advantage.

Counter Plaintiff Crystal Cox has owned Ten Lakes Realty for 12 years, and has been the managing broker as well. Other than co-conspirators, Counter-Defendants, as listed above, Ten Lakes Realty has a Good Reputation, and was a successful Real Estate Company. Counter-Defendant Marc Randazza and Co-Conspirators and Counter Defendants have defamed Counter Plaintiff Crystal Cox, accused Counter Plaintiff Crystal Cox and Defendant Eliot Bernstein of the Crime of Extortion broadcast in mass media. Counter Plaintiff Crystal Cox has been publicly defamed and therefor has lost potential business, clients and advantages.

Counter Plaintiff Crystal Cox is a successful Investigative Blogger providing deep research to CEO's, Investigation Firms, Private Parties, Bankruptcy Creditor and More. Now due to the lies, defamation, fraudulent accusations and painting in false light, Counter-Defendant Marc Randazza and Co-Conspirators and Counter Defendants, the business of Counter Plaintiff Crystal Cox Investigative Blogger has come to a standstill.

Counter Plaintiff Crystal Cox has a successful Nutritional Marketing Business Online and makes a living selling nutritional supplements. Counter-Defendant Marc Randazza and Co-Conspirators and Counter Defendants have Interfered with Counter Plaintiff Crystal Cox's Prospective Business Advantage in this regard.

Counter Plaintiff Crystal Cox is an author and publisher, and my credibility is key in selling eBooks, Photos, and more. Counter-Defendant Marc Randazza and Co-Conspirators and Counter Defendants have Interfered with Counter Plaintiff Crystal Cox's Prospective Business Advantage.

Counter Plaintiff Crystal Cox is an online media, search engine expert and Counter-Defendant Marc Randazza and Co-Conspirators and Counter Defendants have Interfered with Counter Plaintiff Crystal Cox's Prospective Business Advantage.

Counter Plaintiff Crystal Cox is Doing Business as CRYSTAL COX CONSULTING, CRYSTAL COX MEDIA, CRYSTAL COX NEWS, CRYSTAL COX PRESS, CRYSTAL COX PUBLISHING, REVEREND CRYSTAL COX, Nakaii Publishing, Ten Lakes Realty.

Counter Plaintiff Crystal L. Cox has suffered irreparable damage personally and professionally. Wherefore, Counter Plaintiff Crystal L. Cox demands a judgment against Each Co-Conspirator, Each Counter Defendant for actual and punitive damages, and all other relief allowable under the law and federal court rules.

Request for Relief

Counter Plaintiff Crystal L. Cox wishes this court to award $100 Million to Counter Plaintiff Crystal L. Cox from Plaintiff Marc Randazza for the damage caused to Defendant Crystal L. Cox, this includes actual and punitive damages.

Counter Plaintiff Crystal L. Cox wishes 10 Million Dollars from Each Counter Defendant David Carr and the New York Times, Counter Defendant Bob Garfield and Counter Defendant NPR, Counter Defendant Kashmir Hill Forbes, for irreparable damages, defamation, harm to Counter Plaintiff Crystal Cox. And a retraction of Extortion Accusations.

Counter Plaintiff Crystal L. Cox wishes the removal of defamatory blog posts from and CrystalCoxSucks.com, Crystal-Cox.com, CrystalCoxBlows.com, PhillyLawBlog, SaltyDroid, NewYorkPersonalInjuryAttorneyBlog.com, blog.bennettandbennett.com, SaltyDroid.info, Bob Garfield of NPR, WIPO, All WIPO Publications, SequenceInc.com, Popehat.com, http://randazza.wordpress.com/ , and John and Jane Doe Blogs Defaming Counter Plaintiff Crystal L. Cox, for irreparable damages, defamation, harm to Counter Plaintiff Crystal Cox. And a retraction of Extortion Accusations.

Counter Plaintiff Crystal L. Cox wishes 10 Million Dollars from Each from Counter Defendant Tonkon Torp Law Firm, David S. Aman, Jordan Rushie of Mulvihill and Rushie LLC Philly Law Blog, Brown White & Newhouse, Kenneth P. White, Popehat.com, Eric Turkewitz - Turkewitz Law Firm and NewYorkPersonalInjuryAttorneyBlog.com, Scott H. Greenfield of Simple Justice - a New York Criminal Defense Blog, Mark Bennett blog.bennettandbennett.com, Bennett and Bennett, Scott H. Greenfield, Bob Garfield of NPR, David Carr of the New York Times, Kashmir Hill of Forbes, Godaddy Inc., Bob Parsons, Proskauer Rose Law Firm, Kenneth Rubenstein, Allen Fagin, Gregg Mashberg, Jenifer DeWolf Paine, Joseph Lecesse, WIPO, Francis Gurry, Scott H. Greenfield, Carlos Miller, John Calkins Sony, Roxanne Grinage, HireLyrics, Dylan Energy, Martin Cain, Sean Boushie, University of Montana, Royce Engstrom, Bernie Cassidy, Taylor Kai Groenke (Kai Groenke), John and Jane Does, for irreparable damages, defamation, harm to Counter Plaintiff Crystal Cox. And a retraction of Extortion Accusations.

Counter Plaintiff Crystal L. Cox wishes 10 Million Dollars from Each from Proskauer Rose, WIPO, Tonkon Torp, David S. Aman, Michael Morgan, Peter L. Michaelson, Allen Fagin, Gregg Mashberg, Kenneth Rubenstein, Randazza Legal Group, Godaddy, Bob Parsons, Jessica Griffin

GoDaddy, Corbin Fisher, Manwin, Peter L. Michaelson, Jason Jones SaltyDroid, Janine Robben Oregon State Bar Bulletin, Leo Mulville for irreparable damages, defamation, harm to Counter Plaintiff Crystal Cox.

Counter Plaintiff Crystal L. Cox wishes 10 Million Dollars from Each from Liberty Media Holdings, John C. Malone, Corbin Fisher, Manwin, Xbiz. For irreparable damages, defamation, harm to Counter Plaintiff Crystal Cox.

Counter Plaintiff Crystal L. Cox wishes 10 Million Dollars from Each from Kevin D. Padrick, David W. Brown, and Obsidian Finance Group. For irreparable damages, defamation, harm to Counter Plaintiff Crystal Cox.

Counter Plaintiff Crystal L. Cox wishes this court to award $100 Million from Counter Defendant Marc Randazza for the damage caused to Defendant Crystal L. Cox, this includes actual and punitive damages.

Counter Plaintiff Crystal L. Cox wishes this court to be fair and without conflict of interest and to remove all videos from CaptainObvious harming, defaming and endangering Counter Plaintiff Crystal L. Cox.

Counter Plaintiff Crystal L. Cox wishes this court to be fair and without conflict of interest and to remove all hate and defamatory blog posts from Crystal-Cox.com, CrystalCoxSucks.com, CrystalCoxBlows.com, Tumbling Cox, Jordan Rushie of Mulvihill and Rushie LLC Philly Law Blog, Brown White & Newhouse and Kenneth P. White of Popehat.com, Eric Turkewitz - Turkewitz Law Firm and NewYorkPersonalInjuryAttorneyBlog.com, Scott H. Greenfield of Simple Justice - a New York Criminal Defense Blog, Mark Bennett blog.bennettandbennett.com, Bennett and Bennett, Scott H. Greenfield, Bob Garfield of NPR, David Carr of the New York Times, Kashmir Hill of Forbes, WIPO, Francis Gurry, Scott H. Greenfield, Carlos Miller, J Roxanne Grinage, HireLyrics,, Martin Cain, Sean Boushie, John and Jane Does.

Counter Plaintiff Crystal L. Cox wishes this court to be fair and without conflict of interest and to remove all hate and defamatory blog posts from blogs and videos soliciting haters, conspirators, and endangerment to Counter Plaintiff Crystal L. Cox, and Desi Foxx aKa Diana Grandmason and Monica Foster aKa Alex Melody.

Counter Defendants did the things herein maliciously and to oppress counter plaintiff Crystal Cox. Counter Plaintiff Crystal Cox is therefore entitled to exemplary or punitive damage.

Counter Plaintiff Crystal L. Cox has suffered irreparable damage personally and professionally. Wherefore, Counter Plaintiff Crystal L. Cox demands a judgment against Each Co-Conspirator, Each Counter Defendant for actual and punitive damages, and all other relief allowable under the law and federal court rules.

As a direct cause of action and proximate result of Counter Defendants unlawful criminal and civil conspiracy Counter Plaintiff Crystal Cox has been damaged in the ways described, and hereby fully incorporated from the preceding paragraphs, and in the amount as listed above.

Wherefore, Counter Plaintiff Crystal Cox requests that the Court enter a judgment in favor of Counter Plaintiff Crystal Cox.

1. For General and Special Damages

2. For all Damages Above

3. For reasonable costs incurred herein

4. For such other and further relief as the Court seems just in the premises.

Respectfully Submitted

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

Counter-Plaintiff Crystal Cox Declaration of Connected Cases

Case 2:12-cv-02040-GMN-PA District of Nevada is connected to Case CV-11-57-HZ U.S. District Court District of Oregon, Case 2:12-mc-00017-JPH Eastern District of Washington Circuit Court of Oregon Multnomah County Case No. 121215329 and Ninth Circuit Appeal Case: 12-35319. All case dockets, documents, exhibits are hereby included in this case as evidence of criminal and civil conspiracy..

Note to court that despite repeated requests by Cox's counsel in all cases, all lawyers for defense and all judges HAVE REFUSED TO DISCLOSE FINANCIAL AND OTHER CONFLICTS OF INTEREST that have been sent to them, thus denying Cox the right to fair and impartial due process as court can then only be presumed to have conflict or else why fail to admit or deny, all therefore fraud on court, through conflicts that cause obstruction, etc.

CERTIFICATE OF SERVICE

On December 27th 2012
I hereby certify that I served the foregoing on:

Las Vegas Courts
333 Las Vegas Blvd. S.
Room 3071
Las Vegas , NV 89101

VIA Electronic Service with Courts Approval
And to Randazza Legal Group at eMail rdg@randazza.com and lmt@randazza.com

And Electronic Service to Counter-Defendants via eMail

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On December 27th 2012
Respectfully Submitted By,
Investigative Blogger Crystal L. Cox
Reverend Crystal Cox
Pro Se Defendant Crystal Cox

Case 2:12-cv-02040-GMN-PAL