

# IN THE UNITED STATES COURT FOR THE WESTERN DISTRICT OF ARKANSAS

Curtis J Neeley Jr., MFA

v

**CASE NO. 5:09-cv-05151**

**NameMedia Inc.  
Google Inc.**

## **REQUEST FOR LEAVE TO FILE FOURTH AMENDED COMPLAINT**

Comes now the Plaintiff, respectfully and requests granting the Plaintiff leave to file this Fourth Amended Complaint that will add numerous Defendants and claims since liabilities were found after NameMedia Inc ceased violating Plaintiff's exclusive moral rights to publish original nude photographs after January 24<sup>th</sup> 2010. The Fourth attempt to add Defendants must be done to resolve this EXTREMELY complicated swarm of tortuous activity involving nonfeasant federal agencies, Ponzi schemes, and unconstitutional United States Statutes, etc. US Title 17 has been nothing but a HOAX introduced by a lawyer appointed to Congress and signed by President George Washington on May 31, 1790.

Plaintiff does not herein attempt to legally reinvent the wheel. Each claim alleged is supported looking at evidence now exhibited in the record. All claims can be seen in the record before discovery has begun. Discovery is already complete as evidence was mostly publicly available. The Plaintiff seeks leave to enter this Fourth Amended Complaint adding numerous Defendants for the same tortuous swarm of events. Plaintiff does not expect to perfect legal technique but desires to file this Fourth Amended Complaint adding several Defendants and several new claims as well as begrudgingly removing several claims.

The Fourth Amended Complaint is easily the most broadly impacting action in the history of law. This might be considered a *grandiose delusion* but will quickly be seen as simply factual. The resolution in this action requires enforcement of laws already passed but being ignored by the FCC et al. This litigation is more complicated and far-reaching than any legal action has ever been or is likely to ever be. This litigation involves unique circumstances exposed that must now be righted by correct application of laws. This appeal to amend with a replacement complaint is further described concisely in the concurrently filed supporting brief.

Respectfully Submitted

Curtis J. Neeley Jr., MFA

# CERTIFICATE OF SERVICE

I hereby certify that today I will file a copy of the foregoing with the Court clerk for the United States Court in the Western District of Arkansas and the clerk will scan each document and it will be made into a B&W PDF and be available to all attorneys representing the Defendants for this case. Their Counsel will each receive notification from EM/ECF. The color PDFs that were printed from are accessible free to the public at <<http://www.CurtisNeeley.com/5-09-cv-05151/Docket>> immediately and perpetually by the end of the day.

**[CurtisNeeley.com/5-09-cv-05151/Docket](http://www.CurtisNeeley.com/5-09-cv-05151/Docket)**

/s/Curtis J Neeley Jr.  
Curtis J Neeley Jr, MFA