

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
FAYETTEVILLE DIVISION**

CURTIS J. NEELEY, JR.,	§	
	§	
Plaintiff,	§	
	§	
v.	§	CIVIL ACTION NO. 5:14-CV-05135
	§	
5 FEDERAL COMMUNICATIONS	§	
COMMISSIONERS, ET AL.,	§	
	§	
Defendants.	§	

MOTION FOR ATTORNEYS’ FEES AND EXPENSES

By order of August 5, 2014, this Court directed Google to submit an appropriate motion for attorneys’ fees and expenses incurred in response to Mr. Neeley’s “Current Complaint,” otherwise referred to in the Court’s order as “*Neeley VI*”.

Since Mr. Neeley began his campaign of serial litigation in 2009, Google has been forced to spend hundreds of thousands of dollars reviewing and responding to Mr. Neeley’s scores of complaints, motions, renewed motions, appeals, and the like, not to mention reviewing literally hundreds of lengthy emails directed to all counsel, government officials, Supreme Court clerks, our client, and all others to whom Mr. Neeley wrote to complain.

The Court’s Order, however, seeks a fee application directed only at the “Current Complaint.” As that complaint was never served on Google, and the Court disposed of it *sua sponte*, Google incurred only minimal fees, primarily for monitoring filings and attending the show cause hearing. As set forth in the accompanying declaration of Josh Thane, Google has incurred a total of \$11,434.08 in reasonable attorneys’ fees and expenses defending this matter. Specifically, Google incurred \$1,468.80 for work in May, 2014 and \$306.00 for work in July, 2014 by its San Francisco counsel Durie Tangri LLC. Google also incurred \$9,659.28 in fees

and expenses from its local counsel, Haltom & Doan, from the date the complaint in this action was filed until the order of dismissal.

Google, however, has little appetite for extracting money from a self-described indigent, brain damaged amputee. Google's goal is not to have Mr. Neeley reimburse it for fees, but instead to finally have Mr. Neeley leave Google alone. Accordingly, Google moves the Court to award sanctions in the amount of \$11,434.08, but then order payment suspended so long as Mr. Neeley refrains from filing any further claim against Google, based on any acts alleged to have occurred up to the present date. In the event Mr. Neeley institutes any further action against Google, the fee award would immediately become due and payable.

Respectfully submitted,

/s/ Jennifer H. Doan

Jennifer H. Doan

Arkansas Bar No. 96063

Joshua R. Thane

Arkansas Bar No. 2008075

HALTOM & DOAN

6500 Summerhill Road, Suite 100

Texarkana, TX 75503

Telephone: (903) 255-1000

Facsimile: (903) 255-0800

Email: jdoan@haltomdoan.com

Email: jthane@haltomdoan.com

**ATTORNEY FOR DEFENDANT
GOOGLE, INC.**

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5.2. All other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by certified mail, return receipt requested, on this the 19th day of August, 2014.

/s/ Jennifer H. Doan

Jennifer H. Doan