

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF ARKANSAS  
FAYETTEVILLE DIVISION**

**CURTIS J. NEELEY Jr., MFA**

**PLAINTIFF**

**VS.**

**CASE NO. 5:09-CV-05151-JLH**

**NAMEMEDIA, INC.;**

**NETWORK SOLUTIONS, INC.;**

**and GOOGLE, INC.**

**DEFENDANTS**

**LOCAL RULE 7.3 DMCA NOTIFICATIONS**

The following information serves as A N O T H E R Digital Millennium Copyright Act (“DMCA”) notification. This lawsuit filed in the United States Court for the Western District of Arkansas was timely notice and waived the “limitations of liability” almost three years ago. Google Inc waived the “limitations of liability” established to protect online display of visual art by search engines.

The Plaintiff again advises Google Inc Counselors to direct their client to cease display of nude and figure nude art due to searches for exclusively the text “Curtis Neeley”. The following paragraphs communicate the results found May 26, 2011 and are specific enough that Google Inc can cease display of inappropriate visual art like done at (Go-Oogle.net) due to the exclusion of offending domains as is trivial and is asked ordered already. See attached Exhibit “A” for ignored wire communications from Plaintiff.

**Placement of visual art in one context by the creator or other does not authorize Google Inc to copy and display for profit in another context. This fact is obvious and ignored by Google Inc in order to exist.**

## **DMCA Notifications**

1. The <artnude.pp.ru/curtis\_neeley> has removed all art that may have once supported allegations of existing third-party content for numerous inappropriate images displayed by Google Inc despite numerous advisements that it was not desired and was never authorized. Google Inc has been aware of this inappropriate visual art display for over three years and continues to re-publish images from the Russian server and by doing this join them in not reacting to requests for deletion in order to display nudes for profit. Google Inc clings to § 230 for protection alleging having no duty to cease display of indecent art after notification that it is and was never authorized.
2. The URL for the referring webpage titled “nu artistique” is <zola1861.free.fr/links\_p03.html> and the URL of the image file follows. <zola1861.free.fr/links\_p02/Curtis%20Neeley.jpg> This display was not authorized and therefore re-publication by Google Inc will never be.
3. The URL for the page titled “CurtisNeeley on deviantART” alleges containing the image titled (“Thumbs\_UpV?”) is <curtisneeley.deviantart.com/>. The (18+) filtration is bypassed by Google Inc. revealing the file URL of <th02.deviantart.net/fs28/150/f/2009/248/5/c/Thumbs\_Up\_V\_\_by\_CurtisNeeley.jpg>. This manner of display of nude visual art was not authorized and therefore re-publication by Google Inc supporting advertising profits will never be.
4. The URL for the page titled “CurtisNeeley on deviantART” is <curtisneeley.deviantart.com/> and alleges containing the image titled “Thumbs Up”. The eighteen-plus filtration is bypassed to reveal the image URL <th02.deviantart.net/fs35/150/i/2008/304/6/7/Thumbs\_Up\_by\_CurtisNeeley.jpg>. This manner of nude visual art display was never authorized and re-publication by Separate Defendant Google Inc to support advertising profits will never be condoned.
5. The page <wikiwak.com/wak/Chiaroscuro> did not respond and appears to no longer exist to support the file URL claimed by Defendant Google Inc of <wikiwak.com/image/Figurenude%2B(26)%2Bby%2BCurtis%2BNeeley.jpg>. This nude visual art display was never authorized and therefore re-publication by Defendant Google Inc to support advertising profits will never be condoned.

6. The page <[waidandsee.hautetfort.com/index-9.html](http://waidandsee.hautetfort.com/index-9.html)> is a French BLOG that was never authorized to display the figure nude art being shown from the following file URL.<[waidandsee.hautetfort.com/media/01/01/1948157651.jpg](http://waidandsee.hautetfort.com/media/01/01/1948157651.jpg)>. This display was not authorized and therefore re-publication will never be.

7. There exists one entire gallery that was created since 2004 or post-injury by the Plaintiff hosted at <[en.artring.net/00,49006,00.html](http://en.artring.net/00,49006,00.html)> and this gallery has eight thumbnails and larger images with the file URLs that follow. The Plaintiff authorized display in the context of the artring.net site without authorizing re-publication by Google Inc in another context.

([pics.artring.net/49006\\_m\\_01.jpg](http://pics.artring.net/49006_m_01.jpg), [pics.artring.net/49006\\_l\\_01.jpg](http://pics.artring.net/49006_l_01.jpg),  
[pics.artring.net/49006\\_m\\_02.jpg](http://pics.artring.net/49006_m_02.jpg), [pics.artring.net/49006\\_l\\_02.jpg](http://pics.artring.net/49006_l_02.jpg),  
[pics.artring.net/49006\\_m\\_03.jpg](http://pics.artring.net/49006_m_03.jpg), [pics.artring.net/49006\\_l\\_03.jpg](http://pics.artring.net/49006_l_03.jpg),  
[pics.artring.net/49006\\_m\\_04.jpg](http://pics.artring.net/49006_m_04.jpg), [pics.artring.net/49006\\_l\\_04.jpg](http://pics.artring.net/49006_l_04.jpg),  
[pics.artring.net/49006\\_m\\_05.jpg](http://pics.artring.net/49006_m_05.jpg), [pics.artring.net/49006\\_l\\_05.jpg](http://pics.artring.net/49006_l_05.jpg),  
[pics.artring.net/49006\\_m\\_06.jpg](http://pics.artring.net/49006_m_06.jpg), [pics.artring.net/49006\\_l\\_06.jpg](http://pics.artring.net/49006_l_06.jpg),  
[pics.artring.net/49006\\_m\\_07.jpg](http://pics.artring.net/49006_m_07.jpg), [pics.artring.net/49006\\_l\\_07.jpg](http://pics.artring.net/49006_l_07.jpg),  
[pics.artring.net/49006\\_m\\_08.jpg](http://pics.artring.net/49006_m_08.jpg), [pics.artring.net/49006\\_l\\_08.jpg](http://pics.artring.net/49006_l_08.jpg))

8. There exists an image alleged to be hosted from the server <[arte.go.it/iniziativa/2004/eroticart/archivio51.htm](http://arte.go.it/iniziativa/2004/eroticart/archivio51.htm)> with the file URL <[arte.go.it/iniziativa/2004/eroticart/mini/Neeley\\_Curtis.jpg](http://arte.go.it/iniziativa/2004/eroticart/mini/Neeley_Curtis.jpg)> and this nude image was never authorized to be displayed. This display was not authorized and therefore re-publication by Google Inc in another context will never be desired.

9. There exists one notable figure nude image that is hosted at <[en.wikipedia.org/wiki/File:Figure\\_nude\\_%2826%29\\_by\\_CN\\_Foundation.jpg](http://en.wikipedia.org/wiki/File:Figure_nude_%2826%29_by_CN_Foundation.jpg)> and this listing has been altered so that the attribution is now to the “CN Foundation” and Wikipedia will remove even the obscure file history use of “Curtis Neeley”. Google Inc is again advised to cease re-publication to reduce P U N I T I V E damages awarded by the J U R Y.

Respectfully Submitted,

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Curtis J. Neeley Jr., MFA

