

Brad Greenspan  
2885 Sanford Ave SW #33395  
Grandville, MI 49418  
Pro Se Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

**FILED**  
JUL 19 2016  
SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

Brad Greenspan, on behalf of  
himself and all others similarly  
situated,  
vs.

CASE NO.: 5:14-cv-04187-RMW

BY FAX

IAC/InterActiveCorp, a Delaware  
corporation; Google, Inc., a Delaware  
corporation; News Corp, a Delaware  
corporation;  
Defendants.

MEMORANDUM OF POINTS  
AND AUTHORITIES IN SUPPORT  
OF SECOND MOTION TO  
STRIKE

Date: August 26, 2016  
Time: 9:00 a.m.  
Place: Courtroom 6, 4th Floor  
Judge: Honorable Ronald M. Whyte

2016 JUL 19 P 4:21  
SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NO. DIST. OF CA.

RECEIVED

**I-INTRODUCTION**

1. Plaintiff hereby moves this honorable Court to strike certain pleadings. Further to fully incorporate and re-incorporate Plaintiff's previous Motion For Sanctions, so as to provide for more then 21 days notice has also now elapsed if the Court believes a pro se need provide such extraordinary notice to get the protection of making motions for sanctions for defective filings during a Rule FRCP Class Action where Plaintiff is required to receive extraordinary additional protections versus a normal civil proceeding.

**II- STANDARD**

2. FRCP Rule 12(f) provides, "[t]he court may strike from a pleading an insufficient defense or any redundant, immaterial, impertinent, or scandalous matter."

**III- ARGUMENT**

3. Defendant IAC's defective, void, fraudulent pleading by at least three IAC attorneys.

On July 15, 2016 attempting to fix or cure defective Rule 7.11 and Rule 3-15

Certification should be struck in its entirety for i) attempting to gain benefits by backdating  
The Pleading by 12 months. ii) filing a defective false date of submission stating  
"July 5, 2015" on page 3 of document filed July 5, 2016 by Defendant IAC:

11.	Conclusion
For the foregoing reasons, IAC requests that the Court DENY all of the six (6) motions filed between June 21-23, 2016.	
DATED: July 5, 2015	GREENBERG TRAURIG, LLP
By: <u>/s/ Kurt A. Kappes</u> KURT A. KAPPES	
1201 K Street, Suite 1100 Sacramento, CA 95814-3938 Telephone: (916) 442-1111 Facsimile: (916) 448-1709 Email: kappesk@gtlaw.com	
-and-	
James I. Scrota (admitted <i>pro hac vice</i> ) Anastasia A. Angelova (admitted <i>pro hac vice</i> ) 200 Park Avenue New York, New York 10166 Telephone: (212) 801-9200 Facsimile: (212) 801-6400 scrotaj@gtlaw.com angelovaa@gtlaw.com	

#### IV CONCLUSION

4. The relief sought by Plaintiff should be granted.

DATED: July 18, 2016

Respectfully submitted,

By: /s/ Brad Greenspan  
Brad Greenspan  
2885 Sanford Ave SW #33395  
Grandville, MI 49418  
Pro Se Plaintiff