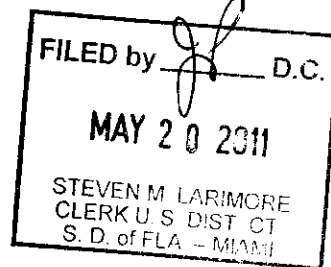


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 11-14052-CIV-MARTINEZ/LYNCH



JOHN ZUCCARINI,)
)
Plaintiff,)
)
v.)
)
NETWORK SOLUTIONS, LLC,)
a Delaware Limited Liability Company;)
NAMEJET, LLC,)
a Delaware Limited Liability Company;)
INTERNET CORPORATION)
FOR ASSIGNED NAMES)
AND NUMBERS, INC.)
a California non-profit Corporation;)
)
Defendants.)
)

**PLAINTIFF JOHN ZUCCARINI'S MOTION
FOR SANCTIONS PURSUANT TO FED. R. CIV. P.11**

Plaintiff, John Zuccarini ("Zuccarini") hereby moves the Court for entry of an Order of sanctions against Defendants Network Solutions, LLC ("Network Solutions") and NameJet, LLC ("NameJet") pursuant to Fed. R. Civ. P. 11(b)(1) and in support thereof, state as follows:

I. INTRODUCTION

Plaintiff Zuccarini as a pro se Plaintiff has tried to present the facts of this action as best as he could in a manner as he understands the laws this Court allow. Zuccarini realizes his presentation may not be perfect in form or content as would be expected from a practicing attorney, but he has filed this Complaint in the belief that an injustice has occurred and he is seeking to have it corrected.

II. FACTS

On February 11, 2011 Zuccarini filed for this action his original Complaint and on February 14, 2011 filed an Amended Complaint. Zuccarini believes the Amended Complaint has real merit and cites legitimate claims against all of the Defendants.

Zuccarini has tried to follow the orders of this Court as best as he could and has cooperated with all the Defendants in communications and meeting with them, and in the submitting to the Court of the Scheduling Report on April 18, 2011 (doc. 39).

In order to prevent unnecessary expense to the Defendants Zuccarini has also agreed to the filing of a Joint Motion for Extension of Time to Serve Initial Disclosures on April 18, 2011 (doc. 38).

On April 20, 2011, Zuccarini was very much surprised to receive from Defendants Network Solutions and NameJet a letter demanding that Zuccarini dismiss with prejudice within 21 days his claims against both Network Solutions and NameJet. *Exhibit A*.

That is, demanding that Zuccarini dismiss all claims against Network Solutions and NameJet even before this Court rules on the Amended Complaint and all the Defendants motions to dismiss.

Accompanying the letter was a proposed motion for sanctions against Zuccarini which makes essentially the same arguments made in both Network Solutions and NameJet motions to dismiss.

Zuccarini finds this action by Network Solutions and NameJet nothing but an attempt by two large and powerful companies to intimidate, harass and "Bully" the pro se Defendant Zuccarini into abandoning his, what he believes to be very legitimate claims.

Zuccarini believes this inflammatory attempt by Network Solutions and NameJet to

intimidate Zuccarini into dismissing all claims against both of the Defendants even before this Court can rule on the Amended Complaint and the Motions to Dismiss, which have all been submitted to the Court is a direct violation of Rule 11 (b)(1), which states any filing should not be presented for an improper purpose, such as to harass.

III. CONCLUSION

For the foregoing reasons, Zuccarini respectfully request that this Court enter an Order of sanctions against Network Solutions and NameJet and take any action which it deems appropriate.

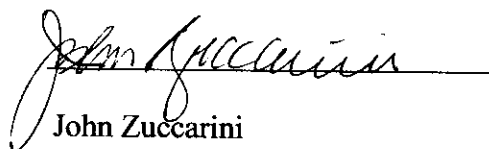
By: 

JOHN ZUCCARINI, Pro Se
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Stuart, FL 34997
(772) 631-3887
raveclub@comcast.net

RULE 11(c)(2) CERTIFICATE

Pursuant to Rule 11(c)(2), I hereby certify that on the 26th day of April, 2011, I served by email and first class mail, postage prepaid, upon Defendants Network Solutions, LLC and NameJet, LLC a copy of the foregoing Plaintiff's Motion for Sanctions Pursuant to Fed. R. Civ. P. 11, together with a letter stating as follows:

Pursuant to Fed. R. Civ. P. 11(c)(2), attached is a service copy of the Fed. R. Civ. P. 11 Motion for Sanctions of John Zuccarini ("Motion for Sanctions"). I demand that you state your intent to not submit a Motion for Sanctions against myself, and in fact do not submit a Motion for Sanctions against myself in the captioned matter within 21 days of the date of this letter and the service of the Motion for Sanctions. If you refuse to not state your intent to file the Motion for Sanctions and do submit the Motion for Sanctions I will be forced to file the Motion for Sanctions against both Network Solutions, LLC and NameJet, LLC with the Court.


John Zuccarini

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Plaintiff John Zuccarini's Motion for Sanctions Pursuant to Fed. R. Civ. 11.P.1 was served by first class mail, postage prepaid, on May 19th, 2011, on all counsel or parties of record on the service list and by email to the respective addresses.


John Zuccarini

SERVICE LIST

Network Solutions, LLC and NameJet, LCC

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Exhibit A

STEIN, SPERLING, BENNETT, DE JONG, DRISCOLL & GREENFEIG, P.C.

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STUART S. GREENFEIG
OUR FILE NUMBER

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DONALD N. SPERLING+
PAUL T. STEIN*
STEVEN A. WIDDES*

MD., DC., VA., NY., CA. #
MD., DC., VA., NY., FL. +
MD., DC., VA., PA., NJ. #
MD., DC., VA., NY. +
MD., DC., VA., WV. ‡
MD., DC., CA. *
MD., DC., MA. †
MD., DC., NY. †
MD., DC., VA. †
MD., VA., NC. *
MD., VA., FL. ‡
MD., DC. *
MD., VA. #
MD., WI. †
MD., TX. †
MA. ONLY †
MD. ONLY*
SC. ONLY*

April 20, 2011

Via Electronic Mail and First Class Mail

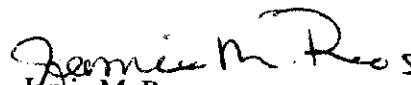
John Zuccarini
190 SW Kanner Highway
Stuart, Florida 34997
Email: raveclub@comcast.net

RE: John Zuccarini v. Network Solutions, LLC, et al.
Case No. 11-14052-CV

Dear Mr. Zuccarini:

Pursuant to Fed. R. Civ. P. 11(c)(2), attached is a service copy of the Fed. R. Civ. P. 11 Motion for Sanctions of Network Solutions, LLC and NameJet, LLC ("Motion for Sanctions"). We demand that you dismiss with prejudice your claims against Network Solutions, LLC and NameJet, LLC in the captioned matter within 21 days of the date of this letter and the service of the Motion for Sanctions. If you refuse to dismiss your claims against Network Solutions, LLC and NameJet, LLC, then we will be forced to file the Motion for Sanctions with the Court.

Regards,


Jamie M. Roos

Enclosure

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STEIN, SPERLING, BENNETT, DE JONG, DRISCOLL & GREENFEIG, P.C.

Mr. John Zuccarini
April 20, 2011
Page 2

cc: Nicholas Beizer, Esquire (*via electronic mail*)
Statton Hammock, Esquire (*via electronic mail*)
Maria Ruiz, Esquire (*via electronic mail*)
Kate Wallace, Esquire (*via electronic mail*)