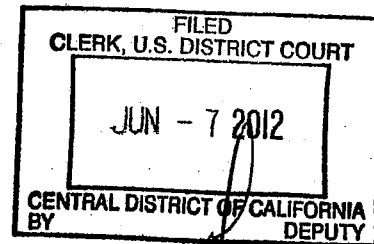


Douglas Crane  
366 Temple Street  
Duxbury, MA 02332  
508-843-7985  
Email: dcranelonerboy@yahoo.com  
PRO SE



UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

NEXON AMERICA, INC., a Delaware corporation, and NEXON KOREA CORPORATION, a Korean corporation,

Plaintiffs,

v.

RYAN MICHAEL CORNWALL a/k/a "Riu Kuzaki" and "Alexandria Cornwall"; YANGYU ZHOU a/k/a "Yang Yu," "W8baby," and "Gamersoul"; DOUGLAS CRANE a/k/a "DJ" and "Lonerboy"; WILLIAM "BILLY" KEISTER a/k/a "ThePhoneGuy"; AMARJOT GILL a/k/a "Alphaamar"; DEREK OSGOOD a/k/a "Jayce"; COLIN JOHNSON a/k/a "Colin "; LINDA LIU a/k/a "linnyda942"; JEREMY SIMPSON; V.H. a/k/a "Vince"; DOE 1 a/k/a "Bizarro" and "Andrew," DOE 2 a/k/a "Cam1596," and DOES 3 through 10, inclusive,

Defendants.

CASE NO. 2:12-cv-00160-RSWL-FFM

Honorable Ronald S.W. Lew

Motion by Defendant- To Dismiss for failure to Join Party

Defendant Doug Crane moves the Court for an order dismissing the above-entitled cause, and each of the claims attempted to be set forth in the Complaint because of the following matters

1. Owners and Operators of the "HackShield" technology should be joined as the complaint alleges this Technical Security Measure (paragraph 19 of the Complaint) is part of the complaint.
2. No adequate Judgment can be rendered without joining not only doe 2 and doe 3 and YangYU Zhou but more importantly many other web site communities, forums, developers and coders who have long engaged in precisely the same allegations in the complaint and whom were a party to the named defendants and/or named web sites prior to the complaint, the court or plaintiff should join all these to prevent inequitable, unfair damages as well as prevent continued lawsuits being brought forward by this plaintiff for the very same subject matter over and over again. List below shows a basic list of known identical site communities (some much larger then gamersoul.com and have been in existence much longer then gamersoul.com) need to be joined to this suit to prevent inequity, prejudice and multiple suits. The owners, operators, members to whom posted/contributed and in fact took part in multiple online communities including w8baby, gamersoul and/or Riu web site have posted and engaged in identical activity, posting identical links, identical software, identical threads as the plaintiff claims in their complaint (in many instances the only difference is the graphic user interface IE: the way a software appears on a computer or the methods in which these sites derive income from these identical threads, posts, links, software's ) among many web communities and this small list of sites presented in this motion could never be fully served by this court and any appropriate damage is incalculable, the court could not prevent an endless stream of identical lawsuits if this case is allowed to proceed in this fashion.

- a. Gamekiller.net
- b. Ccplz.net
- c. gamerzplanet.net
- d. mpcforum.com
- e. *gamerzneeds.net*
- f. mpgh.net
- g. itemshops.com
- h. forum.cheatengine.org
- i. forbiddencheats.net
- j. zerogamers.com
- k. gamexploits.com
- l. shadygamer.com
- m. weezygamecheats.realbb.net
- n. sns gaming.com

These are sites in which software developers, members, moderators have “leap frogged” and overlapped from and/or to w8baby.com to an extent which would cause the current named defendants in the above complaint to have unfair, undue burden and prejudice and severely inequitable damage. This is such an incredibly large and systemic ongoing worldwide issue that

is truly impossible to calculate damages to the plaintiff from one small segment of current defendants.

Compliance with rule 19 of the Federal Rules of Civil Procedure states that in those person's absence, the court cannot accord complete relief among existing parties and/or leave an existing party subject to a substantial risk of incurring double, multiple, or otherwise inconsistent obligations because of the interest and is a basis for dismissal of the complaint.

Defendant Doug Crane Pro SE respectfully moves the Court for an order dismissing the above-entitled cause, and each of the claims attempted to be set forth in the Complaint.

#### Certificate of Service

I undersigned hereby certify that copies of the above were delivered to all council in this case by Doug Crane

Via email to:

Elaine Ki Jin Kim [ekk@msk.com](mailto:ekk@msk.com)

Karin G Pagnanelli [kgp@msk.com](mailto:kgp@msk.com)

Marc Ellis Mayer [mem@msk.com](mailto:mem@msk.com)

Via USPS to:

Ryan Michael Cornwall

1818 2nd Street Apt 55

Waco, TX 76706

May 23, 2012

Doug Crane 366 Temple St. Duxbury, Ma. 02332

A handwritten signature in black ink, appearing to read "Doug Crane", written in a cursive style.