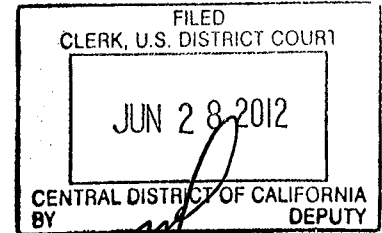


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Nexon America, Inc. and NEXON Korea
Corporation
UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA



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
"linnya942"; 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

Defendants reply brief

MOTIONS TO DISMISS FOR

FAILURE TO JOIN PARTY

(DOCKET NOS. 32 AND 36)

Date: ~~July~~ 27, 2012

June D.C.

Defendant's reply brief to plaintiffs reply on Motion to Dismiss for failure to join party.

The defendant re-alleges that Hackshield is required to be a party to this suit because nexon, nor I have the technical knowledge to understand and this software design or how and why it functions and if in fact any 3rd party software invades this programs rights or if possible suits, problems, designs are or have been brought by Hackshield previously and why hackshield has not brought suit if the former not be the case. it would be seemingly important to allow for defendants to file interrogatories related to those employee's (past and present) of hackshield Co. who may be a part of the cause of the complaint filed by nexon and to prevent the defendant opportunity to investigate hackshield equally and completely to identify those individuals within that company who may very well be the largest offenders of the allocations in this complaint would be unfair, but most importantly Hackshield should be joined to prevent future lawsuits by hackshield against the same defendants.

The plaintiff alleges that Doug Crane was one of the "chief" administrators of w8baby.com and/or gamersoul.com when clearly I am not. The plaintiffs' attorneys themselves admitted verbally that I am a "bit" player to other attorneys whom represented Doug Crane until all Doug Cranes money ran out (IE: attorney Gary Lambert Boston, Ma.), Doug Crane immediately cease and desisted any and all activity related to any and all game forums including w8baby.com the minute he learned of this complaint, Doug Crane has attempted to facilitate in so much as possible a settlement between Nexon and any Game forums in which

Doug has been active with and even though the owners and operators of w8baby/gamersoul as well as Ryan Cornwall have agreed to take down all sites and immediately cease and desist everything in Nexon's complaint if this lawsuit stops, Nexon and/or Nexons attorneys have refused to give any settlement or stop any suit and moreover it is my belief that Nexon and/or Nexons attorneys DO NOT CARE WHATSOEVER about taking down these web site's as they claim in their complaint (there is a bigger agenda going on here for Nexon then they wish to admit to a Judge or Court) and this statement can be supported by the honorable Judge Wrights comments and opinions in this example http://blog.ericgoldman.org/archives/2012/04/maplestory_enfo.htm furthermore if Doug Crane was a "chief" administrator the site would be down NOW.

Doug Crane was an active user of the forums and in being an active member of this forum community he was promoted to a moderator, then super mod, then to one of the numerous numbers of admin's who have come and gone over the course of a few years on this site, Doug Crane has zero technical skill with computers and his main skill in this forum was to prevent scammers from scamming members of the forum, prevent and advocate against vulgarities and prevent racist remarks and/or personal attacks towards others. Doug Crane's age and work against discrimination allowed him to be trusted by Bizarro, ThePhoneGuy and YuY enough to include him as an admin in the forum. Doug Crane allowed them to use his alertpay account during a time when their alertpay accounts were compromised and/or unavailable. Other admins had their own different ability to HTTP/PHP code or ability to draw and write graphics, etc. (but those were NOT Doug Cranes attributes).

The plaintiff claims Doug Crane was responsible for overseeing the sale of "hacks", Doug Crane refers to "BT" as the private forum area's in which members pay to get into (known as the BT forums inside w8baby.com) There was never any specific "hacks" sold on the forums or by Doug Crane but rather "access" to the BT forums area (which has many tips, tricks, glitches, maps, products like stickers or posters, contests, as well as a multitude of links, programs, etc. in which the forum has always stated

are for educational purposes) however I am understanding of nexons complaint and have agreed to personally honor it.

Plaintiff alleges Doug Crane answered the complaint months ago and now moves to dismiss this action, Doug Crane has no representation and is/has been at the mercy of plaintiff's attorney and the plaintiff's attorney agreed via email to allow the court to consider and decide on the motions at hand in exchange for a swift agreement to their rule 26 report which was frantically filed fast as if the "court" would die if we did not agree and file it by a swift specific date. I accepted that rule 26 report with the agreement that the court be allowed to weigh and be free to make whatever proper determination they see fit regarding my motions. If I had thought answering the complaint would in some way nullify my ability to speak truth and make the court aware of these serious real problems/dilemmas with this case then I most certainly would not have filed an answer.

Plaintiff claims I need to provide proof that the complaint allegations involve 1000's of people and/or sites other than w8baby and that those people involved in the complaint have engaged in the exact same activity on many other sites. This proof would be very simple for anyone to see clearly by visiting all of the sites listed in my motion. A great example is the plaintiff's own description of programs they claim as w8baby hacks called "Cheetah Injector" this program was sold from gamecheetah.com which is evidently now down, explanations regarding this I've found here <http://www.gamerzplanet.net/forums/spam/340435-gamecheetah-owned.html> , evidently Nexon threatened law suit against this forum and they were allowed to simply take forum down with no further recourse (now IM being sued for some other forums program which sold for years prior to w8baby even existing) . Examples can be seen here <http://www.elitepvpers.com/forum/soldier-front-hacks-bots-cheats-exploits/641529-release-cheetah-injector-v1-4-a.html> and here <http://www.youtube.com/watch?v=8zNoz0z4q4> riot is the person who made this program and riot was a staff member of gamecheetah.com prior to shutting down. I can most certainly give explanations, proof and examples of Bizarro Trainer first being sold on cheatengineforum and how xentar trainer is the same source code of bizarre trainer or how any number of previous administrators on w8baby.com prior to me are now

engaged and running identical sites such as <http://ccplz.net/> is owned and operated by S3nsa & Jony Leeson who was also an admin for <http://www.gamekiller.net/forum.php> also ccplz.net and many other sites including sngaming release and link the same programs in complaint regarding bypassing "anti cheating technology" and its as simple as Nexon taking 5 minutes to look at these 1000's of forums and communities worldwide to prove these facts. Kitterz PE is another program claimed to be a w8baby "hack", it would be as simple as a person to google the letters "Kitterz PE" to find the proof that w8baby.com is nowhere near the top searches that come to the for front regarding kitterz PE but worst...its source code was released publicly when kitterz quit playing maplestory games as shown here <http://www.gamerzneeds.net/forums/maple-story-gms-oms-bots-hacks/140602-kitterzpe-v-70-a.html> though i do not have the resources to even come close to identifying each and every example of persons and sites similar the few ive given here now and im unsure how in depth and how many examples would be proper to prove to this court that I am speaking honestly and truthfully in this brief, but I can assure the court that it is humanly impossible for the court and/or the plaintiff to join, locate, identify the 1000's of people and sites around the world which would be necessary to prevent inequitable, unfair damages as well as prevent continued lawsuits being brought for eternity regarding the same programs and people and the same complaints as the plaintiff alleges. I can elaborate for hours and days to the court to show and prove that what I am telling the court now under the pains and penalties of prison that these examples and an endless multitude of other examples are true and if Nexon is allowed to sue "some" for the doings of "others" or to lay all the evils of the world at the doorstep of one small segment for their own personal "agenda" it would be a horrible injustice to allow.

The plaintiff claims "the case law is clear that these other persons, who operated other websites not at issue here, are not necessary or indispensable parties", but what the plaintiff is neglecting to say is that these very individuals who operate other web sites and/or release and sell programs on many other web sites and these very individuals named in the complaint are and have been involved in selling, posting, releasing identical things on 100's of sites over many more years then w8baby.com has even existed (the example of w8baby being sued for cheetah injector is almost absurd, where are the owners and operators of the site which originated and released and sold it for years called gamecheetah.com ?) The

plaintiffs comparisons in this area do not hold weight since the individuals who run, operate and participate in these other sites are the very same individuals who have been a party to running, participating and operating w8baby.com and the programs, releases, software, etc. are the very same as they used and participated in and are called out in the complaint by the plaintiff. Most certainly existing party's would be exposed to incurring multiple and inconsistent obligations because almost every individual named worked at multiple other sites and the hundreds of unnamed individuals from other sites have indeed worked at and participated with w8baby.com. Moreover this is assuming the plaintiffs own admission of Yang and Bizarro and the other main originators/owners of w8baby.com can be joined, we are all kindly awaiting that as well.

If indeed the plaintiff wanted the remedy of taking down one or two web sites then this would have been done the day the complaint was filed upon those web sites and we could all move on in life. Make no mistake... there is an agenda by Nexon here which the courts and the public are only beginning to become aware of. Why was w8baby.com not allotted the same courtesy given to gamecheetah? Why is Nexon suing w8baby for what is clearly a gamecheetah program? This and many other rational questions give me great pause to try and understand and rationalize and I can only hope and pray with all my might the same pause is taken by your honer.

Defendant Doug Crane 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.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

June 27, 2012
Doug Crane Pro SE

A handwritten signature in black ink, appearing to read 'Doug Crane', is written over the typed name.

Certificate of Service

I undersigned hereby certify that copies of the above were delivered to all council in this case by Norma Crane am over the age of eighteen years and am not a party to this action; my business address is 253 Ames St. Brockton, Ma. 02302

On June 27, 2012 I delivered the documents named "reply brief motions to dismiss for failure to join party" and "reply brief motion to dismiss for lack of jurisdiction" via USPS to:

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Cival Intake Dept.

312 N. Spring St.

Los Angeles, CA 90012

Ryan Michael Cornwall

riukuzaki@gmail.com

1818 2nd Street Apt 55

Waco, TX 76706

I declare under penalty of perjury under the laws of the United States that the above is true and correct.

Executed on June 27, 2012 Norma Crane

A handwritten signature in cursive script, appearing to read "Norma Crane", is written over the typed name.