

1 KARIN G. PAGNANELLI (174763)
kgp@msk.com
2 MARC E. MAYER (190969)
mem@msk.com
3 MITCHELL SILBERBERG & KNUPP LLP
11377 West Olympic Boulevard
4 Los Angeles, CA 90064-1683
Telephone: (310) 312-2000
5 Facsimile: (310) 312-3100

6 Attorneys for Plaintiffs

7

8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

10

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

13 Plaintiffs,

14 v.

15 GAMEANARCHY LLC, a Georgia
Limited Liability Company, DAVID
16 ALLEN BAKER, a/k/a "Drunken
Cheetah," an individual, and DOES 1
17 through 10,

18 Defendants.

CASE NO. CV12-2083-MWF (PLAx)

**STIPULATION FOR ENTRY OF
PROTECTIVE ORDER**

19

STIPULATION

21 This Stipulation is entered into between and among Plaintiffs Nexon
22 America, Inc. and NEXON Korea Corporation (collectively, "Nexon"), on the one
23 hand, and Defendants GameAnarchy, LLC and David Allen Baker (collectively,
24 "Defendants"), on the other hand (together, the "Parties"), by and through their
25 respective counsel of record.

26 WHEREAS, the Parties agree that disclosure and discovery activity in this
27 action are likely to involve the production of confidential, proprietary, or private

28

1 information for which special protection from public disclosure and from use for
2 any purpose other than prosecuting this litigation would be warranted;

3 WHEREAS, to promote the Parties' desire to protect the confidentiality of
4 such information, the Parties have met and conferred and agree that disclosure and
5 discovery of information in this action should be governed by the terms set forth in
6 the [Proposed] Stipulated Protective Order (the "Protective Order"), attached
7 hereto and lodged concurrently herewith.

8 NOW THEREFORE, it is hereby stipulated between Plaintiffs, on the one
9 hand, and Defendants, on the other hand, by and through their respective attorneys
10 of record, that disclosure and discovery of information in this action shall be
11 governed by the Protective Order.

12

13 DATED: May 23, 2012

MITCHELL SILBERBERG & KNUPP LLP

14

15

By: 

Marc E. Mayer

Attorneys for Plaintiffs

16

17

BURKE, WILLIAMS & SORENSEN, LLP

18

DATED: May 23, 2012

19

By: 

J. Leah Castella

Attorneys for Defendants

20

21

22

23

24

25

26

27

28