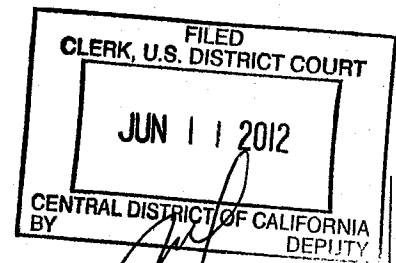


Douglas Crane
366 Temple Street
Duxbury, MA 02332
508-843-7985
Email: dcranelonerboy@yahoo.com
PRO SE



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. snsgaming.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. Riu web site has never been connected to w8baby web site other then Ryan Cornwall happened to be an administrator of w8baby.com and then proceeded to make his own site (the exact same occurrences have happened 100's or 1000's of times with 100's or 1000's of other people) therefor: how can the plaintiff possibly claim fair and equitable damages of anykind after condoning /participating or at the very least turning their heads for 10 years while reaping the benefits, publicity, memberships and sales of such worldwide spread communities that have been identical in every way shape and form to w8baby.com and/or ruikusaki.com

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.

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

Doug Crane 366 Temple St. Duxbury, Ma. 02332

May 23, 2012



EXHIBIT A-2

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am Norma Crane, A Resident of State of MASS. I 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 508-580-4485

On 6-8-2012, I served a copy of the foregoing document(s) described as Motion to Dismiss for Failure to Join Party. on the interested parties in this action at their last known address as set forth below by taking the action described below:

Marc E. Mayer

Mitchell, Stilberberg + Knapp LLC

11377 West Olympic Blvd.

Los Angeles, CA. 90064

Robin Unander, Esq.

Law Office of Robin L. Unander

924 Anacapa Street

Suite 21

Santa Barbara, CA 93101

Attorneys for Linda Liu

Ryan Cornwall

1818 S 2nd St.

Apt. 55

Waco, TX 76706

RivKuzaki@gmail.com

☒ **BY MAIL:** I placed the above-mentioned document(s) in sealed envelope(s) addressed as set forth above, and deposited each envelope in the mail at Marshfield MA. Post office. Each envelope was mailed with postage thereon fully prepaid.

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

Executed on 6/8, 2012, at

Marshfield, MA. Post office

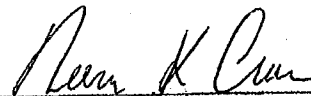
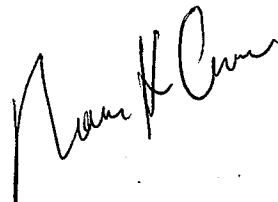


Exhibit A-2

Page 1

Affidavit or Party without Attorney: Norma Crane 508-580-4485 253 Ames St. Brockton, MA 02302		For Court Use Only	
Attorney for:			
Insert name of Court, and Judicial District and Branch Court: United States District Court Central District Of California			
Plaintiff: NEXON AMERICA, INC., ET AL.			
Defendant: RYAN MICHAEL CORNWALL, ET AL., DOUG CRANE			
PROOF OF SERVICE Motion To Dismiss		Hearing Date:	Time:
		Day/Div: R.S.W.L.	Case Number: 12-00160-RSWL (PFMX)

- At the time of service I was at least 18 years of age and not a party to this action.
- I served copies of the Motion To Dismiss for Failure To Join Party.
- Party served:
 - Person served: MARC E. MAYER (Attorney for Plaintiff)
11377 West Olympic Blvd. Los Angeles, CA. 90064
- Address where the party was served:
- I served the party:
 - by Certified First Class MAIL

7. Person Who Served Papers:

mailed by Norma Crane
 of 253 Ames St.
 Brockton, MA 02302
 From the Marshfield, MA
 Post office

Recoverable Cost Per CCF 1033.5(a)(4)(B)

- The Fee for Service was: \$ 4.00
- I am: Not a Registered California Process Server

Norma H Crane

- I declare under penalty of perjury under the laws of the State of California and under the laws of the United States Of America that the foregoing is true and correct.
 Date:

PROOF OF SERVICE

Norma H Crane