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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
"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

**PLAINTIFFS' APPLICATION TO
FILE UNDER SEAL EXHIBITS J
AND K OF THE DECLARATION
OF MARC E. MAYER IN SUPPORT
OF PLAINTIFFS' OPPOSITION TO
DEFENDANT DOUGLAS CRANE'S
MOTIONS TO DISMISS FOR LACK
OF PERSONAL JURISDICTION
AND/OR TO TRANSFER VENUE
(DOCKET NOS. 31 AND 35)**

Date: July 17, 2012

Time: 10:00 a.m.

Ctrm: 21, Spring St. Courthouse

[[Proposed] Order filed concurrently
herewith]

1
2 Plaintiffs Nexon America, Inc. and NEXON Korea Corporation file this
3 Application pursuant to Civil Local Rule 79-5.1 for permission to file under seal
4 Exhibits J and K to the Declaration of Marc E. Mayer (the "Declaration") filed in
5 support of Plaintiffs' Opposition to Defendant Douglas Crane's Motions to
6 Dismiss for Lack of Personal Jurisdiction and/or to Transfer Venue (Docket Nos.
7 31 and 35).

8 On June 15, 2012, the parties filed a Stipulation for Protective Order and
9 [Proposed] Protective Order (Docket No. 37). On June 25, 2012, Magistrate Judge
10 Mumm entered the Protective Order.

11 Exhibits J and K to the Declaration of Marc E. Mayer are spreadsheets
12 containing transaction information concerning payments made for purchases of
13 "VIP" subscriptions to the GamerSoul website. Specifically, Exhibits J and K
14 contain the records of the payment processor, AlertPay, Inc., which show the
15 addresses of individuals who made payments to Crane relating to the GamerSoul
16 Website. As such, Exhibits J and K contain personal name and address
17 information and other financial information relating to third parties. Accordingly,
18 Plaintiffs believe that such documents should be treated as sensitive and
19 confidential and therefore, filed under seal. Additionally, when the information
20 reflected in Exhibits J and K was provided to Nexon's counsel, it was designated
21 as "Confidential."

22
23
24 DATED: June 26, 2012

MITCHELL SILBERBERG & KNUPP LLP

25 By: /s/Marc E. Mayer

26 Marc E. Mayer
27 Attorneys for Plaintiffs

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF Los Angeles

3 I am employed in the County of Los Angeles, State of California, I am over
4 the age of eighteen years and am not a party to this action; my business address is
5 Mitchell Silberberg & Knupp LLP, 11377 West Olympic Boulevard, Los Angeles,
CA 90064-1683.

6 On June 26, 2012, I served a copy of the foregoing document(s) described as
7 **PLAINTIFFS' APPLICATION TO FILE UNDER SEAL EXHIBITS J AND**
8 **K OF THE DECLARATION OF MARC E. MAYER IN SUPPORT OF**
9 **PLAINTIFFS' OPPOSITION TO DEFENDANT DOUGLAS CRANE'S**
10 **MOTIONS TO DISMISS FOR LACK OF PERSONAL JURISDICTION**
11 **AND/OR TO TRANSFER VENUE (DOCKET NOS. 31 AND 35)** on the
12 interested parties in this action at their last known address as set forth below by
taking the action described below:

13 Mr. Ryan Cornwall
14 1818 S 2nd Street
15 Apt. 55
16 Waco, TX 76706

17 ☒ **BY MAIL:** I placed the above-mentioned document(s) in sealed
18 envelope(s) addressed as set forth above, and deposited each envelope in the
19 mail at Los Angeles, California. Each envelope was mailed with postage
20 thereon fully prepaid.

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

23 Executed on June 26, 2012, at Los Angeles, California.

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Jennifer Gaines

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I am employed in the County of Los Angeles, State of California, I am over the age of eighteen years and am not a party to this action; my business address is Mitchell Silberberg & Knupp LLP, 11377 West Olympic Boulevard, Los Angeles, CA 90064-1683, and my business email address is bag@msk.com.

Douglas Crane
EMAIL: dcranelonerboy@yahoo.com

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

Jennifer Gaines
Jennifer Gaines