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Nexon America, Inc. and NEXON Korea
7 Corporation

lodged proposed
2012 JUN 26 PM 4:13
CLERK U.S. DISTRICT COURT
CENTRAL DISTRICT CALIF.
LOS ANGELES
FILED

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10 UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

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12 NEXON AMERICA, INC., a Delaware
13 corporation, and NEXON KOREA
CORPORATION, a Korean corporation,
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15 Plaintiffs,

16 v.

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

25 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.
Ctm: 21, Spring St. Courthouse

[[Proposed] Order filed concurrently
herewith]

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Plaintiffs Nexon America, Inc. and NEXON Korea Corporation file this Application pursuant to Civil Local Rule 79-5.1 for permission to file under seal Exhibits J and K to the Declaration of Marc E. Mayer (the "Declaration") filed 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).

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

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

DATED: June 26, 2012
MITCHELL SILBERBERG & KNUPP LLP
By: /s/Marc E. Mayer
Marc E. Mayer
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,
6 CA 90064-1683.

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

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

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

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

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

26
27
28 
Jennifer Gaines

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,
6 CA 90064-1683, and my business email address is bag@msk.com.

7 On June 26, 2012, I served a copy of the foregoing document(s) described as
8 **PLAINTIFFS' APPLICATION TO FILE UNDER SEAL EXHIBITS J AND**
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
13 taking the action described below:

14 Douglas Crane

15 EMAIL: dcranelonerboy@yahoo.com

16 **BY ELECTRONIC MAIL:** I served the above-mentioned document
17 electronically on the parties listed at the email addresses above and, to the
18 best of my knowledge, the transmission was complete and without error in
19 that I did not receive an electronic notification to the contrary

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

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

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Jennifer Gaines