

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/ka/ "Bizarro" and "Andrew"; DOE 2 a/k/a "Cam1596"; and DOES 3 through 10, inclusive,
Defendants.

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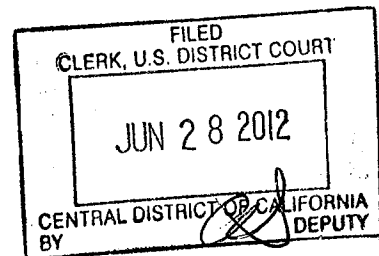
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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
CASE NO. 2:12-cv-00160-RSWL-FFM

**REPLY BRIEF TO PLAINTIFFS OPPOSITION TO MOTION TO DISMISS
FOR LACK OF JURISDICTION AND/OR CHANGE OF VENUE**



Date: ~~July~~ 27, 2012

June DC.

Doug Crane has explained to plaintiff attorney many times that ANY administrator account on w8baby.com can be accessed and used by any other administrator account of w8baby.com (they can literally log onto the account as if they were me and use the account how they wish, this is true for all admin accounts ive seen except the accounts named Bizarro and thephoneguy) and for this reason upon ceasing and desisting in any and all activity on any gaming forums or communities and quitting only to see others still logging onto the "lonerboy" account I deleted it to prevent any further people logging in as if they were I. admittedly I know ive stretched truth or made statements to "impress" that had zero truth to them or to make others believe I knew how to play the game or use "hacks" well, but the fact is they were mostly fabrication. This forum has add on software shown here <http://www.vbulletin.org/forum/showthread.php?t=233350&highlight=admin+log+in+as+another+user> which allows them to use any accounts at "will" and therefor it is impossible to assume anyone person is "the" person who posted (the only 2 accounts which are exempt from this are thephoneguy and bizarro). Ive read and can say without hesitation that many of the comments the plaintiff alleges "lonerboy" has posted were absolutely, positively NOT made by me. My main purpose on the site as an admin was to stop vulgar language, scams, etc. and though I certainly did fabricate many posts to give the impression I was smart or that BT forums were great it does not mean these were truth.

W8baby.com sells access to BT forums area (a private area which includes tips, tricks, glitches, maps, contests, sticker sales, poster sales, includes unique forum name colors and/or avatars, and includes many programs, links and posts to be used for educational purposes. I have however honored Nexons complaint in so much as im able by ceasing any and all activity on all game forums the minute I learned of the complaint. If I was indeed a chief administrator the site would in fact be down NOW! I was always the least important admin in the history of w8baby because I had zero technical skill in forums or computers and my only benefit to the forums was my advocacy for keeping it safe for members and as clear from vulgarities and/or scammers and/or discrimination and bullying which is what lead to the trust those people like thephoneguy, bizarro and yuy having trust to eventually make me one of the many admin's eventually.

I have been nothing but honest with full disclosure to nexon and their attorneys from day one (proven by my efforts to show them all my personal records), the alertpay account I allowed the forum to use and have access to (including bizarre, thephoneguy, yuy and amar) was obviously a mistake I regret, but that certainly should not be grounds for me to loose my rights under the law to defend myself in my jurisdiction since nexon knows I cant defend myself in their jurisdiction.

transactions claimed from California under an account that I was not in control of or aware of at the time should not be used against me and the totals of 10% from California appear to be incorrect to me and it should require more then simply using information I provided to the plaintiff in confidence to prove a specific person from California did any such business with me directly as anyone can make an alertpay account saying they reside in any state or town (proven by my address listed incorrectly as Marshfield) but moreover ive known many people who have created alertpay accounts showing them in

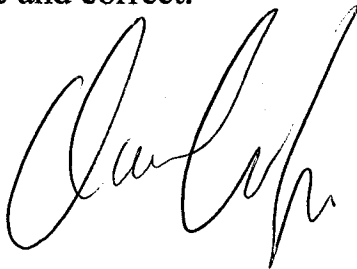
whole different countries! Plaintiff should have NO rights to claim information handed them in confidence which was not under Dougs control at the time as reliable or factual to a degree that would deny the constitutional rights of another. The fact is that many alertpay accounts were used by w8baby.com to a much larger degree then Doug's ever was and Doug Cranes alertpay account was used when their main alertpay account at lkqw999@hotmail.com was compromised (alertpay is fully aware of this), moreover this was the reason w8baby had changed their name to gamersoul (not to avade Nexon as the plaintiff contends but rather because the owner of w8baby domain was compromised along with his alertpay account). Doug Crane himself NEVER linked his account to any forum! Its by Dougs Efforts to disclose and assist plaintiffs that such information was retrieved and secured under the pretext that it NOT be used against him (LET THIS BE A LESSON TO ANYONE WHO BELIEVES THEY CAN REASON WITH NEXON OR THEIR ATTORNEYS)! this should NOT be cause for taking away Doug's rights to be tried in his Jurisdiction if Nexon wishes to peruse him.

At the time I played maplestory game it was not owned by Nexon but rather wizet so I should be held to wizet's original terms of service (not the current terms of service offered by nexons counsel) . there were ZERO terms of service I agreed to which stated that jurisdiction shall be held in Wizets home town if they decided to come sue me in the future to destroy my life and family. Nexons attorneys are fully aware of not only my income, personal bank statements, tax returns, and any conceivable assets they could possibly attempt to take or attach, but also my medical records and they know I cannot defend myself in California which is why I believe they have spend more money then they know they could ever possibly obtain from me in continuing this attack against me! A reasonable person would take pause to understand the outcome could never be greater then the costs incurred getting their and if Nexon and/or Nexons attorneys feel so wealthy with the courts time and the peoples time with an unrelenting, unforgiving, pit bull mentality of attacking anyone and everyone they can obtain names of then they can spend the time and money on an airplane as well in my mind if they choose to persue their hidden agendas. I can only hope and pray your honor will see that my Jurisdiction is indeed Boston because to me I've had no more connections to California then I have to Antarctica .

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

Doug Crane Pro SE

June 27, 2012

A handwritten signature in black ink, appearing to read 'Doug Crane', written over a light blue horizontal line.

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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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 black ink, appearing to read "Norma Crane", is written over the typed name.