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5 Facsimile: (310) 312-3100
6 Attorneys for Plaintiffs Nexon America, Inc.,
and NEXON Korea Corporation
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Original proposed order
3:20 PM
2:00 PM
WCLD
U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
2013 JAN 18 PM 3:13
FILED

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA
11

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

CASE NO. 2:12-cv-00160 JGB (FFMx)

14 Plaintiffs,

Honorable Jesus G. Bernal

15 v.

**PLAINTIFFS' APPLICATION TO
FILE UNDER SEAL EXHIBIT I TO
THE DECLARATION OF MARC E.
MAYER IN SUPPORT OF
PLAINTIFFS' MOTION FOR
DEFAULT JUDGMENT AND THE
DECLARATION OF CONFIDENTIAL
WITNESS A IN SUPPORT OF
PLAINTIFFS' MOTION FOR
DEFAULT JUDGMENT AND
EXHIBITS THERETO**

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

[[Proposed] Order filed concurrently
herewith]

Date: February 25, 2013
Time: 9:00 a.m.
Ctrm: 790

25 Defendants.
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1 Plaintiffs Nexon America, Inc. and NEXON Korea Corporation file this
2 Application pursuant to Civil Local Rule 79-5.1 for permission to file under seal
3 (1) Exhibit I to the Declaration of Marc E. Mayer in Support of Plaintiffs' Motion
4 for Default Judgment, and (2) the Declaration of Confidential Witness A and
5 exhibits thereto.

6 On June 15, 2012, the parties filed a Stipulation for Protective Order and
7 [Proposed] Protective Order (Docket No. 37). On June 25, 2012, Magistrate Judge
8 Mumm entered the Protective Order. Pursuant to the Protective Order, Nexon
9 seeks to file the above-mentioned documents under seal.

10 Exhibit I to the Declaration of Marc E. Mayer relates to deposition testimony
11 that was designated as "Confidential" in this action. The statements therein,
12 among other things, reflect confidential conversations concerning this action.

13 Likewise, the testimony contained in the Declaration of Confidential
14 Witness A was provided on a confidential basis. The declaration includes sensitive
15 information concerning the internal operations of certain businesses at issue in this
16 action, as well as sensitive personal information concerning the witness.
17 Additionally, the declaration includes financial documents that could implicate the
18 privacy of Confidential Witness A or third parties that are not defendants in this
19 action.

20 Accordingly, Plaintiffs request that the Court grant this application and
21 allow Plaintiffs to file the aforementioned documents under seal.¹

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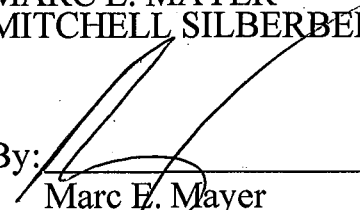
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26 ¹ The defaulting parties are not signatories to the Protective Order in this action.
27 Accordingly, they are being served with all papers (including this Request) except
28 for those filed under seal. If any of the defaulting parties contacts Nexon's counsel
and agrees to be bound by the Protective Order, the sealed documents will be
provided.

1 DATED: January 18, 2013

KARIN G. PAGNANELLI
MARC E. MAYER
MITCHELL SILBERBERG & KNUPP LLP

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4 By: 
5 Marc E. Mayer
6 Attorneys for Plaintiffs
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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 January 18, 2013, I served a copy of the foregoing document described
8 as **PLAINTIFFS' APPLICATION TO FILE UNDER SEAL EXHIBIT I TO**
9 **THE DECLARATION OF MARC E. MAYER IN SUPPORT OF**
10 **PLAINTIFFS' MOTION FOR DEFAULT JUDGMENT AND THE**
11 **DECLARATION OF CONFIDENTIAL WITNESS A AND EXHIBITS**
12 **THERE TO** on the interested parties in this action at their last known address as
13 set forth below by taking the action described below:

10 Colin Johnson
11 59750 Dogwood Road
12 Mishawaka, IN 46544

12 *Defendant*

Robin Unander, Esq.
Law Office of Robin L. Unander
924 Anacapa Street, Suite 21
Santa Barbara, CA 93101

Attorney for Linda Liu

13 William Keister
14 1014 Hanson Road
15 Joppa, MD 21085

15 *Defendant*

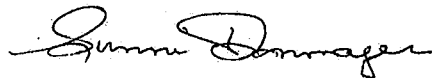
Derek Osgood
9 3rd Avenue
Lakeville, MA 02347

Defendant

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

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

20 Executed on January 18, 2013, at Los Angeles, California.

21 

22 _____
23 Sunni Donmoyer

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 sgd@msk.com.

7 On January 18, 2013, I served a copy of the foregoing document described
8 as **PLAINTIFFS' APPLICATION TO FILE UNDER SEAL EXHIBIT I TO**
9 **THE DECLARATION OF MARC E. MAYER IN SUPPORT OF**
10 **PLAINTIFFS' MOTION FOR DEFAULT JUDGMENT AND THE**
11 **DECLARATION OF CONFIDENTIAL WITNESS A AND EXHIBITS**
12 **THERE TO** on the interested parties in this action at their last known address as
13 set forth below by taking the action described below:

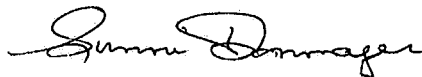
14 Douglas Crane Armajot Gill
15 EMAIL: dcranelonerboy@yahoo.com EMAIL: alphaamar@gmail.com
16 *Defendant* *Defendant*

17 Ryan Michael Cornwall
18 EMAIL: riukuzaki@gmail.com
19 *Defendant*

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

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

26 Executed on January 18, 2013, at Los Angeles, California.

27 

28 _____
Sunni Donmoyer