

Date: March 5, 2021

RE: DMCA COMPLAINT

To Whom It May Concern,

I represent both NEXON Korea Corporation (“**NEXON**”) and Thingsoft Corporation (“**Thingsoft**”) and I hereby provide you with notice of copyright infringement pursuant to the Digital Millennium Copyright Act (DMCA). The following is a notification, in good faith, of alleged copyright infringement as required in §512(c)(3)(A) of the U.S. Copyright Law.

Please also be advised that §512(c)(1) of the U.S. Copyright Law requires you to “expeditiously” remove or disable access to the allegedly infringing material upon receipt of a DMCA-compliant notice of infringement.

Thingsoft exclusively owns the intellectual property rights in and to the PC online game titled “**Peria Chronicles**” (the “**Game**”) and all intellectual properties thereof, including the client software of the Game which was officially published by NEXON and provided and/or distributed to end users of the Game in order for such end users to access the server of NEXON (the “**Copyrighted Material**”).

For further details regarding the Game, please see <https://www.youtube.com/watch?v=DuVl3fRwrhA> and Exhibit A herein. NEXON and Thingsoft hereby jointly confirms that copyright resides in and to the Game, including the Copyrighted Material, and that such copyright is exclusively owned by Thingsoft.

It has recently come to our attention that (a) illegal and unauthorized copy(ies) and/or reproduction(s) of the Copyrighted Material (the “**Infringing Material**”) have been made available and distributed within Ragezone forum pages identified below (the “**Chat Room**”); and (b) such Infringing Material is actively distributed and promoted via or within the Chat Room without Thingsoft’s permission or license (the “**Infringing Activities**”). As the sole and main purpose of the operation of the Chat Room is to distribute and make available the Infringing Material, the Chat Room and the Infringing Activities clearly constituted copyright infringement under the U.S. Copyright Law.

The details required to identify the Chat Room are set forth below:

<http://forum.ragezone.com/f857/peria-chronicles-1195001/>
Peria chronicles - Page 2 - RaGEZONE - MMO development community

NEXON and Thingsoft confirm that the Infringing Material available, distributed, and promoted via or within the Chat Room is mere copy and substantially similar reproduction of the Copyrighted Material, and the unauthorized reproduction, use and/or distribution of the Copyrighted Material

clearly infringes intellectual property rights in and to the Game and the Copyrighted Material exclusively owned by Thingsoft.

THEREFORE, NEXON and Thingsoft HEREBY REQUEST Ragezone to:

1. Expeditiously disable access to or remove the Chat Room from your service; and
2. Take any and all appropriate actions to cease the Infringing Activities, such as terminate or suspend the Ragezone account of the Chat Room operator pursuant to §512(i) of the U.S. Copyright Law.

NEXON and Thingsoft takes its intellectual proprietary rights in and to the Game and the Copyrighted Material very seriously and will not tolerate the infringement of such intellectual property rights. As you may already be aware, we have been awarded damages by initiating both criminal and civil proceedings against wrongdoers in Germany, Canada, the United States and other jurisdictions around the globe.

I state that I have a good faith belief that the distribution and use of the Copyrighted Material described above is not authorized by the copyright owner, or its agent, or the law.

I state that the information in the notification is accurate, and under penalty of perjury, that I am authorized to act on behalf of the owner of an exclusive copyright that is allegedly infringed.

If you have any questions, you may contact legal@nexon.co.kr.

Thank you for your attention and cooperation.

Best regards,

NEXON Korea Corporation

7 Pangyo-ro, 256beon-gil, Bundang-gu,
Seongnam-si, Gyeonggi-do, Republic of Korea, 13487

Junghun Lee
Chief Executive Officer



Thingsoft Corporation

25 Pangyo-ro, 256beon-gil, Bundang-gu,
Seongnam-si, Gyeonggi-do, Republic of Korea

Sangwon Chung
Chief Executive Officer



EXHIBIT A

Below please find evidence showing that Nexon and Thingsoft, as the rightful IP holders, have developed and published the Game in year 2019:





레나의 깜짝 이벤트

활발한 커뮤니티 활동을 보여주거나, 건전하고 즐거운 공간을 위해 노력해주신 파이어니어 여러분 중 20분께 레나가 손수 준비한 깜짝 선물인 '레나의 선물'을 보내드릴 예정입니다 +o+

과연 레나는 어떤 선물을 준비했을까요~?
파이어니어 여러분의 많은 참여 부탁드립니다!

* 이벤트 기간 : 5월 9일(목) ~ 5월 19일(일)
* 당첨 발표 : 5월 24일(금)

- 당첨발표일로부터 7일 내에 수령동의를 진행해주지 않을 경우 당첨이 취소됩니다.
- '레나의 선물'은 현물 경품으로 당첨발표 페이지에서 받으실 주소와 연락처를 입력해주셔야 합니다.



