

1 8. The true names and capacities, whether individual, corporate, associate or
2 otherwise, of defendants herein named as Does 3 through 50, inclusive, are unknown to
3 Plaintiff, which, therefore, sues said Defendants by such fictitious names. Plaintiff will
4 seek to amend this complaint to state the true names and capacities of these Doe defendants
5 when they have been ascertained. At the time of the wrongful acts described in this cross-
6 complaint, the named defendants and Does 1 through 50, participated in some or all of the
7 acts herein alleged, whether as principal, agent, alter ego, employer, employee, successor or
8 representative of some or all of the other Defendants, acting within the course and scope of
9 said agency and employment.
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12 9. Venue lies in the County of Los Angeles because that is the county where
13 Harrison anticipates receiving the payment upon which this action is based. The last act to
14 confirm Harrison's plot, misdeeds, and in particular his extortion will take place in Los
15 Angeles County.
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17 10. Plaintiff is the owner of all of the rights to computer software known as
18 "MyChanger", which is a multi-utility application for online blog communities.
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MyChanger allows persons to manage multiple accounts at once, permitting users to send bulletins, send comments, send friend requests, and change profile settings.

11. One of the additional features of MyChanger, which adds value to Plaintiff, is that it has a data mining function. This function operates to collect data from users of the software, encrypts that data, and transmits that valuable information to Plaintiff. This function is disclosed to purchasers and prospective purchasers of the MyChanger software