

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

BO SHANG,
Plaintiff (Pro Se),
v.
TWITCH INTERACTIVE, INC.,
[Proposed New Defendant] APPLE INC.,
ALPHABET INC. (GOOGLE),
Defendants.

Case No.: 3:24-cv-06664-JSC

PLAINTIFF'S MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT AND
TO JOIN APPLE INC. AS A DEFENDANT; AND
[PROPOSED] FIRST AMENDED COMPLAINT FOR INJUNCTIVE
RELIEF, DAMAGES, DECLARATORY JUDGMENT, AND OTHER RELIEF
JURY TRIAL DEMANDED

PLEASE TAKE NOTICE that Plaintiff, pro se, hereby moves this Court for leave to file a First Amended Complaint and to add Apple Inc. as a newly joined Defendant, pursuant to Federal Rules of Civil Procedure 15(a)(2), 19, 20, and 21. In support of this motion, Plaintiff respectfully shows the Court as follows:

MOTION FOR LEAVE

1. Pursuant to Judge Scott Corley's Order issued on or about January 9, 2025 (Dkt. No. 30), the Court directed Plaintiff to clarify and refile claims consistent with the Court's ruling on prior allegations against Twitch Interactive, Inc. ("Twitch"). Plaintiff was further directed that if he intends to bring claims against Apple Inc., he must file the appropriate motion to amend the complaint and join Apple as a defendant, rather than simply filing new claims on the existing docket.
2. Plaintiff respectfully submits that good cause exists to grant leave to file this First Amended Complaint, as it reflects compliance with the Court's Order, clarifies Plaintiff's causes of action, removes certain previously dismissed constitutional claims against private actors, and properly joins Apple Inc. given the related subject matter and overlapping factual and legal issues. Plaintiff has also included Alphabet Inc. (Google) as a defendant for the same reasons previously stated.
3. The proposed First Amended Complaint is attached below in its entirety. No party would be unduly prejudiced by granting leave, especially given that these issues arise from the same or

closely related transactions or occurrences involving the technology sector's allegedly unfair or unlawful business practices.

WHEREFORE, Plaintiff respectfully requests that the Court GRANT this Motion for Leave to File First Amended Complaint and to Join Apple Inc. as a Defendant.

Dated: January 12, 2025