

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

MICROSOFT CORPORATION, a  
Washington corporation,

Plaintiff,

v.

JOHN DOES 1-2, CONTROLLING A  
COMPUTER NETWORK AND THEREBY  
INJURING PLAINTIFF AND ITS  
CUSTOMERS,

Defendants.

Civil Action No:

**FILED UNDER SEAL PURSUANT TO  
LOCAL RULE 5**

**PLAINTIFFS' MOTION FOR PROTECTIVE ORDER TEMPORARILY  
SEALING DOCUMENTS**

Pursuant to Fed. R. Civ. P. 26(c)(1) and Local Civil Rule 5, Plaintiff Microsoft Corporation ("Microsoft") hereby moves for this case and all documents filed in this case be sealed pending execution of the temporary restraining order sought in Plaintiff's *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction ("TRO Application"), and the following documents in particular, filed by Plaintiffs in this action:

1. Plaintiffs' Complaint and Appendices in support thereof;
2. Civil Cover Sheet;
3. Application for an Emergency Ex Parte Temporary Restraining Order and Order to Show Cause Re: Preliminary Injunction
4. Brief in Support of Emergency Ex Parte Temporary Restraining Order and Order to Show Cause Re: Preliminary Injunction
5. [Proposed] Order Granting Plaintiffs' Application for a Temporary Restraining Order and Order to Show Cause Re: Preliminary Injunction

6. Declaration of Christopher Coy in Support of Plaintiffs' Application for an Emergency Ex Parte Temporary Restraining Order and Order to Show Cause Re: Preliminary Injunction;
7. Declaration of Garylene Javier in Support of Plaintiffs' Application for an Emergency Ex Parte Temporary Restraining Order and Order to Show Cause Re: Preliminary Injunction;
8. Motion for Protective Order Temporarily Sealing Documents;
9. Brief in Support of Motion for Protective Order Temporarily Sealing Documents
10. The declaration of Gabriel M. Ramsey in Support of Motion for Protective Order Temporarily Sealing Documents;
11. [Proposed] Order Granting Plaintiffs' Motion for Protective Order Temporarily Sealing Documents; and
12. *Pro Hac Vice* Applications for Gabriel M. Ramsey, Garylene Javier, and Anna Z. Saber.

Microsoft respectfully requests that these materials be sealed pending execution of the *ex parte* relief sought in Microsoft's TRO Application, in particular the disabling of the domains set forth in **Appendix A** to the Complaint. Upon execution of that *ex parte* relief, Microsoft will file with the Clerk of the Court a Notice that the Preliminary Injunction Order has been executed and thereupon requests that all sealed documents be immediately unsealed.

Microsoft respectfully requests that should the Court decide not to grant the *ex parte* temporary relief requested in Microsoft's TRO Application, that the materials be sealed indefinitely.

Dated: May 26, 2022

Respectfully submitted,

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