## 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,	Civil Action No:  FILED UNDER SEAL PURSUANT TO LOCAL RULE 5
Defendants.	) ) )

## [PROPOSED] ORDER GRANTING MOTION FOR PROTECTIVE ORDER <u>TEMPORARILY SEALING DOCUMENTS</u>

Before the Court is Plaintiff Microsoft Corporation ("Microsoft")'s Motion for a Protective Order Temporarily Sealing Documents. Upon consideration of the Motion, the pleadings filed herein and the arguments of counsel, the Court finding that the arguments of applicable rules and Fourth Circuit precedent are satisfied, that the requested order is the least restrictive means available to protect the interests of Microsoft and the public, and that there is a compelling need to enter a temporary sealing order, THEREFORE it is hereby ORDERED that the instant case and the following documents be filed and maintained UNDER SEAL in accordance with Fed. R. Civ. P. 26(c)(1) and Local Rule 5, pending (i) the Court's consideration of Microsoft' Application for an Emergency *Ex Parte* Temporary Restraining Order and Order to Show Cause re Preliminary Injunction ("TRO Application")

Pursuant to Fed. R. Civ. P. 26(c)(1) and Local Civil Rule 5, Plaintiff hereby moves for

this case and all documents filed in this case to be sealed pending execution of the temporary restraining order sought in Plaintiff's 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. 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.

IT IS FURTHER ORDERED that, the documents referenced in this Order shall remain sealed until such time as the Court may conduct a hearing and rule on the TRO Application, at which time the Court shall consider the appropriate terms for continued sealing.

IT IS SO ORDERED.		
Entered this	_ day of	, 2022.
		United States District Judge