

**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
THEREBY INJURING MICROSOFT
AND ITS CUSTOMERS,

Defendants.

Civil Action No: 1:22-cv-607-AJT-WEF

**PLAINTIFF MICROSOFT’S MOTION FOR DEFAULT JUDGMENT AND
PERMANENT INJUNCTION**

Plaintiff Microsoft Corporation (“Microsoft”), by counsel, pursuant to Federal Rules of Civil Procedure 55(b)(2), 53, 65(a) and (c), the Computer Fraud and Abuse Act (18 U.S.C. § 1030), the Lanham Act (15 U.S.C. §§ 1114, 1116, & 1125), the common law and the Court’s inherent equitable authority, respectfully moves the Court for entry of a default judgment and permanent injunction against the Defendants.

As discussed in Microsoft’s brief in support of this motion for default judgment and permanent injunction, Microsoft requests an order entering default judgment against the Defendants who have failed to answer, plead or otherwise defend this action, and a permanent injunction preventing Defendants from continuing their harmful activities by providing Microsoft control over the existing Bohrium domains.

The requested relief is necessary to halt the Bohrium operation that is causing irreparable injury to Microsoft and its customers. Microsoft respectfully requests that the Court grant this Motion.

Dated: June 15, 2023

Respectfully submitted,

/s/ David J. Ervin

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Attorneys for Plaintiff Microsoft Corp.

CERTIFICATE OF SERVICE

I hereby certify that on June 15, 2023, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system.

Copies of the foregoing were also served on the defendants listed below by electronic mail:

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