

**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 PERMANENT INJUNCTION

Plaintiff Microsoft Corporation (“Microsoft”), by counsel, pursuant to Federal Rules of Civil Procedure 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 a permanent injunction against the Defendants.

As discussed in Microsoft’s brief in support of this motion for permanent injunction, Microsoft requests an order entering 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 20, 2023

Respectfully submitted,

/s/ David J. Ervin

David J. Ervin (VA Bar. No. 34719)

Garylene Javier (*pro hac vice*)

CROWELL & MORING LLP

1001 Pennsylvania Avenue NW

Washington DC 20004-2595

Telephone: (202) 624-2500

Fax: (202) 628-5116

dervin@crowell.com

gjavier@crowell.com

Gabriel M. Ramsey (*pro hac vice*)

Anna Z. Saber (*pro hac vice*)

CROWELL & MORING LLP

3 Embarcadero Center, 26th Floor

San Francisco, CA 94111

Telephone: (415) 986-2800

Fax: (415) 986-2827

gramsey@crowell.com

asaber@crowell.com

Attorneys for Plaintiff Microsoft Corp.

CERTIFICATE OF SERVICE

I hereby certify that on June 20, 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:

John Does 1-2

c/o

shashankvashist8@gmail.com
jatin.hariani2@gmail.com
jatin.hariani2019@protonmail.com

/s/ David J. Ervin

David J. Ervin (VA Bar No. 34719)
CROWELL & MORING LLP
1001 Pennsylvania Avenue NW
Washington DC 20004-2595
Telephone: (202) 624-2500
Fax: (202) 628-5116
dervin@crowell.com

Attorney for Plaintiff Microsoft Corp.