

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Microsoft Corporation, a Washington State Corporation and Health-ISAC, Inc., a Florida non-profit organization,

Plaintiffs,

v.

Joshua Ogundipe,

and

John Does 1-4, Controlling A Computer Network and Thereby Injuring Plaintiffs and Their Customers,

Defendants.

Civil Action No. 25-cv-07111-JSR

**NOTICE OF MOTION FOR DEFAULT JUDGMENT AND PERMANENT
INJUNCTION**

PLEASE TAKE NOTICE that, on May 18, 2026, at 3:00 p.m., or as soon thereafter as this matter may be heard in Courtroom 14B of Daniel Patrick Moynihan Courthouse in the Southern District of New York, located at 500 Pearl Street, New York, New York, 10007, Plaintiffs Microsoft Corporation (“Microsoft”) and Health-ISAC, Inc., (collectively, “Plaintiffs”) will move, pursuant to Federal Rule of Civil Procedure 55(b)(2), for an Order Granting Plaintiffs’ Motion for Default Judgment and Permanent Injunction against Joshua Ogundipe and John Does 1-4 (collectively “RaccoonO365 Defendants”) named in this lawsuit in connection with Plaintiffs’ claims for relief pursuant to: (1) the Computer Fraud and Abuse Act, 18 U.S.C. § 1030; (2) the Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. § 1962; (3) Conspiracy to Violate the Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. § 1962(d); (4) the Electronic Communications Privacy Act, 18 U.S.C. § 2701; (5) False Designation of Origin under the

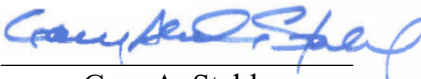
Lanham Act, 15 U.S.C. § 1125(a); (6) Trademark Infringement under the Lanham Act, 15 U.S.C. § 1114 et seq.; (7) Trademark Dilution under the Lanham Act, 15 U.S.C. § 1125(c); (8) common law trespass to chattels; (9) conversion; and (10) unjust enrichment.

The relief sought by Plaintiffs is made upon the accompanying Memorandum of Law for Default Judgment and Permanent Injunction, and the Proposed Order filed concurrently, along with all pleadings and papers previously filed in connection with this matter.

Dated: May 11, 2026

Respectfully submitted,

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