

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

MICROSOFT CORPORATION, a Washington Corporation, FORTRA, LLC, a Delaware Limited Liability Company, and HEALTH-ISAC, INC., a Florida Corporation,

Plaintiffs,

v.

JOHN DOES 1-2, JOHN DOES 3-4 (AKA CONTI RANSOMWARE GROUP), JOHN DOES 5-6 (AKA LOCKBIT RANSOMWARE GROUP), JOHN DOES 7-8 (AKA DEV-0193), JOHN DOES 9-10 (AKA DEV-0206), JOHN DOES 11-12 (AKA DEV-0237), JOHN DOES 13-14 (AKA DEV-0243), JOHN DOES 15-16 (AKA DEV-0504), Controlling Computer Networks and Thereby Injuring Plaintiffs and Their Customers,

Defendants.

**Case No.**

**FILED UNDER SEAL**

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

Pursuant to Fed. R. Civ. P. 26(c)(I) and Local Civil Rule 5, Plaintiffs Microsoft Corporation ("Microsoft"), Fortra LLC ("Fortra"), and Health-ISAC, Inc. ("H-ISAC") (collectively, "Plaintiffs") hereby move for this case and all documents filed in this case to be sealed pending execution of the temporary restraining order sought in Plaintiffs' *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. The instant Emergency Motion To Temporarily File Case Under Seal and attachments hereto;
2. The Declaration of Garylene Javier in Support of the instant Emergency Motion To Temporarily File Case Under Seal;
3. Plaintiffs' Complaint;
4. Application for Emergency *Ex Parte* Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and accompanying documents;

5. Brief in Support of Emergency Ex Parte Temporary Restraining Order and Order to Show Cause re Preliminary Injunction;
6. The declaration of Anna Saber in Support of Plaintiffs' *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and attachments thereto;
7. [Proposed] Order Granting Temporary Restraining Order, Seizure Order And Order To Show Cause Re Preliminary Injunction
8. The declaration of Jason Lyons in Support of Plaintiffs' *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and attachments thereto;
9. The declaration of Christopher Coy in Support of Plaintiffs' *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and attachments thereto;
10. The declaration of Rodel Finones in in Support of Plaintiffs' *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and attachments thereto;
11. The declaration of Jonathan Gross in Support of Plaintiffs' *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and attachments thereto;
12. The declaration of Errol Weiss in Support of Plaintiffs' *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and attachments thereto;
13. The declaration of Robert G. Erdman II in Support of Plaintiffs' *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and attachments thereto;
14. Motion for Leave to Exceed Page Limits re Plaintiffs' Brief in Support of Plaintiffs' Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction;
15. Brief in Support of Motion for Leave to Exceed Page Limits re Plaintiffs' Brief in Support of Plaintiffs' Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction;
16. [Proposed] Order Granting Motion for Leave to Exceed Page Limits re Plaintiffs' Brief in Support of Plaintiffs' Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction;
17. Plaintiffs' Motion for Protective Order Temporarily Sealing Documents;
18. Brief in Support of Plaintiffs' Motion for Protective Order Temporarily Sealing Documents;

19. Declaration of Garylene Javier In Support of Plaintiffs' Motion for Protective Order Temporarily Sealing Documents and attachments thereto;
20. [Proposed] Order Granting Plaintiffs' Motion for Protective Order Temporarily Sealing Documents;
21. Notice of Hearing Re Application of Microsoft For An Emergency Ex Parte TRO and Order to Show Cause Re Preliminary Injunction; and
22. Pro Hac Vice Applications.

Plaintiffs respectfully request that these materials be sealed pending execution of the *Ex Parte* relief sought in Plaintiffs' TRO Application, in particular the disabling of the IP addresses and domains set forth in **Appendix A** to the Complaint. Upon execution of that *Ex Parte* relief, Plaintiffs will file with the Clerk of the Court a Notice that the Preliminary Injunction Order has been executed and thereupon such filing would immediately unseal all previously sealed documents without further action. Plaintiffs respectfully request that should the Court decide not to grant the *Ex Parte* temporary relief requested in Plaintiffs' TRO Application, that the materials be sealed indefinitely.

Dated: March 30, 2023

Respectfully submitted,



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