

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

Microsoft Corporation, a Washington State Corporation and LF Projects, LLC, a Delaware State Series Limited Liability Company,

Plaintiffs,

v.

Abanoub Nady (also known as MRxC0DER),

and

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

Defendants.

Civil Action No.

**FILED UNDER SEAL PURSUANT TO
LOCAL RULE 5**

**BRIEF IN SUPPORT OF PLAINTIFFS' MOTION FOR LEAVE TO EXCEED PAGE
LIMITS RE: PLAINTIFFS' TRO APPLICATION**

Pursuant to Fed. R. Civ. P. 7 and Local Civil Rule 7(f)(3), Plaintiffs Microsoft Corporation (“Microsoft”) and LF Projects, LLC (“LF Projects”) hereby move for leave to exceed the page limits for Plaintiffs’ Brief In Support of Plaintiffs’ Application for Emergency *Ex Parte* Temporary Restraining Order and Order to Show Cause.

Contemporaneously with the filing of this Motion, Plaintiffs are filing an Application for an Emergency Ex Parte Temporary Restraining Order and Order to Show Cause (“TRO Application”). Plaintiffs’ brief in support of the TRO Application is 46 pages.

Under Local Rule 7(f)(3), briefs are generally limited to 30 pages. Because of the complexity of the issues presented in this case, however, Plaintiffs cannot fully explain the factual and legal bases for their TRO Application within the 30-pages limit. Accordingly, Plaintiffs respectfully request that this Court grant leave to excess the page limits imposed by Local Civil

Rule 7. Plaintiffs are filing this Motion for Leave to Exceed Page Limits contemporaneously with the filing of their case-initiating documents and TRO Application because of the urgent nature of these proceedings, the need for emergency relief, and the importance of maintaining confidentiality regarding the relief Plaintiffs request from the Court.

The Court may, in its discretion, grant leave to a party to exceed the page limit set forth in Local Civil Rule 7 and consider the party's brief in its entirety. *See, e.g., Harrison v. Prince William County Police Dep't*, 640 F. Supp. 2d 688, 700 (E.D. Va. 2009) (enlarging page limit given unusual procedural posture of the case). Here, because of the substantial public interest involved, the nature of the relief requested, and the complexity of Fake ONNX Defendants' cybercriminal activities, enlargement of the page limitation is critical to permitting Plaintiffs a full opportunity to describe the extensive technical factual predicate for its TRO Application.

Plaintiffs are submitting extensive evidence in support of their TRO Application that must be set forth in detail in the supporting brief. In particular, Plaintiffs are submitting detailed technical declarations and other evidence related to the following: (1) the tactics use by Fake ONNX Defendants for cybercriminals operations, (2) the complex methodology used by Fake ONNX in connection with their Phishing-as-a-Service enterprise, (3) the complete wholesale copying of LF Projects' trademark in the name and brand "ONNX," (4) the harmful effects of Fake ONNX Defendants' behavior on Plaintiffs, and (5) the irreparable harm suffered by Microsoft, its customers, LF Projects, and the public as a result of Fake ONNX Defendants' actions. In order to fully explain the significance of this evidence, Plaintiffs require more than 30 pages of briefing.

Accordingly, given the technical issues presented in this case and the *ex parte* nature of the TRO Application, Plaintiffs' respectfully request relief from Local Civil Rule 7's page limitation so that Plaintiffs can provide the Court with the information it needs to rule on the merits of the

TRO Application.

CONCLUSION

For the reasons stated, Plaintiffs request to exceed the page limits set forth in Local Civil Rule 7 and asks that Court consider Plaintiffs' brief in support of their TRO Application in its entirety.

Dated: November 12, 2024



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