

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

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

Plaintiffs,

v.

Abanoub Nady (also known as MRxCODER),

and

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

Defendants.

Civil Action No.: 1:24-cv-2013-RDA

PLAINTIFFS' RESPONSE TO ORDER TO SHOW CAUSE

Plaintiffs Microsoft Corporation (“Microsoft”) and LF Projects, LLC (“LF Projects”) (collectively, “Plaintiffs”) respond to the Order to Show Cause dated May 20, 2026 (Dkt. No. 40).

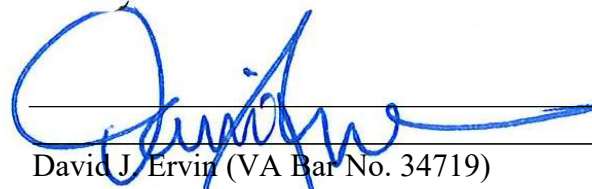
Since the last filings on the docket, Plaintiffs have continued to litigate this case to the best of their abilities. On November 21, 2024, Plaintiffs served Defendants Abanoub Nady and Defendants John Does 1-4 (the “Fake ONNX Defendants”) via publication with the Complaint, summons, *Ex Parte* Application for Temporary Restraining Order, and related material through Court-ordered methods pursuant to Fed. R. Civ. P. 4(f)(3) that were reasonably calculated to provide Fake ONNX Defendants with notice of the proceedings. Dkt Nos. 16 at 11 and 31 at 9 (TRO and Preliminary Injunction authorizing alternative methods of service, including by e-mail and Internet publication). On December 1, 2024, Plaintiffs served the Fake ONNX Defendants with the same document via the email addresses Fake ONNX Defendants used to register the

domains that Defendants used to support the technical infrastructure of their phishing-as-a-service campaign (“Fake ONNX Domains”). Fake ONNX Defendants have not responded to the Complaint or otherwise appeared in this action.

Plaintiffs served subpoenas on seventeen third party registrars seeking account information, payment information, device information for the accounts associated with the Fake ONNX domains, as well as communications with the account holders in an effort to obtain additional information regarding the Fake ONNX Defendants’ identities. Plaintiffs’ counsel reviewed the subpoena responses and determined that the information Fake ONNX Defendants provided to the registrars was likely fictitious. For example, the address information Plaintiffs received in response to the subpoenas contained fake addresses, incomplete addresses, or addresses where the street address did not match the listed city or state. From this, Plaintiffs concluded that the identifies of the Fake ONNX Defendants, which they obfuscated to commit cybercrimes, could not be ascertained using civil discovery tools despite Plaintiffs’ best efforts.

In light of the above, Plaintiffs respectfully request that this Action not be dismissed for failure to prosecute. Further, contemporaneous with Plaintiffs’ response to the Order to Show Cause, Plaintiffs are filing an Application for Entry of Default pursuant to Fed. R. Civ. P. 55. Once the clerk enters default, Plaintiffs will file a motion for default judgment and permanent injunction pursuant to Fed. R. Civ. P. 55(b)(2) and Fed. R. Civ. P. 65.

Dated: June 4, 2026



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