

**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 MRxC0DER),

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' MOTION FOR DEFAULT JUDGMENT AND PERMANENT
INJUNCTION**

Plaintiffs Microsoft Corp. (“Microsoft”) and LF Projects, LLC (collectively, “Plaintiffs”), by counsel, pursuant to Federal Rules of Civil Procedure 55(b)(2), 53, 65(a) and (c), the Computer Fraud and Abuse Act (18 U.S.C. § 1030), the Racketeer Influenced and Corrupt Organization Act (18 U.S.C. § 1962, 1962(d)), the Electronic Communications Privacy Act (18 U.S.C. § 2701), the Lanham Act (15 U.S.C. §§ 1114, 1125), common law, the All Writs Act, (28 U.S.C. § 1651), and the Court’s inherent equitable authority, respectfully move the Court for entry of a default judgment and permanent injunction against Defendants Abanoub Nady (also known as MrXC0DER) and John Does 1-4 (collectively, the “Fake ONNX Defendants” and formerly known as “Caffeine”).

As discussed in Plaintiffs’ brief in support of this motion for default judgment and permanent injunction, Plaintiffs request an order entering default judgment against the Fake ONNX Defendants who have failed to answer, plead or otherwise defend this action, and a

permanent injunction preventing the Fake ONNX Defendants from continuing their harmful activities by providing Microsoft with permanent control over the existing Fake ONNX domains.

The requested relief is necessary to prevent the Fake ONNX Defendants from causing future irreparable injury to Microsoft, its customers, LF Projects, and the public. Plaintiffs respectfully request that the Court grant this Motion.

Dated: July 28, 2026



Robbie Rogart Jost (VA Bar No. 84377)

David J. Ervin (VA Bar No. 34719)

Jeffrey L. Poston (*pro hac vice*)

CROWELL & MORING LLP

600 Fifth Street NW

Washington, DC 20001

T: 202-624-2500

F: 202628-5116

RJost@crowell.com

DErvin@crowell.com

JPoston@crowell.com

Amanda (Anna) Z. Saber (*pro hac vice*)

CROWELL & MORING LLP

3 Embarcadero Center, 26th Floor

San Francisco, CA 94111

T: 415-986-2800

F: 415-986-2827

ASaber@crowell.com

*Counsel for Plaintiffs Microsoft Corporation and LF
Projects LLC*