

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

MICROSOFT CORPORATION, a
Washington corporation,

Plaintiff,

v.

JOHN DOES 1-2,
Controlling a Computer Network
Thereby Injuring Plaintiff and Its
Customers,

Defendants.

Civil Action No:

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

**PLAINTIFF’S MOTION FOR PROTECTIVE ORDER TEMPORARILY SEALING
DOCUMENTS**

Pursuant to Fed. R. Civ. P. 26(c)(1) and Local Civil Rule 5, Plaintiff Microsoft Corporation (“Microsoft”) moves for this case and all documents filed in this case be sealed pending execution of the temporary restraining order sought in Plaintiff’s *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 Plaintiff in this action:

1. The instant Motion for Protective Order Sealing Documents and accompanying documents, including the Brief in support of this Motion;
2. The declaration of Gabriel M. Ramsey in Support of Motion for Protective Order Sealing Documents;
3. Plaintiff’s Complaint and Appendices thereto;
4. Plaintiff’s *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and accompanying documents;

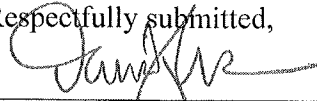
5. The declaration of Christopher Coy in Support of Plaintiff's *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and attachments thereto;
6. The declaration of Gabriel M. Ramsey in Support of Plaintiff's *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and attachments thereto; and
7. [Proposed] Temporary Restraining Order and accompanying documents.

Plaintiff respectfully requests that these materials be sealed pending execution of the *ex parte* relief sought in Plaintiff's TRO Application, in particular the disabling of the domain names set forth in **Appendix A** to the Complaint. Upon execution of that *ex parte* relief, Plaintiff will file with the Clerk of the Court a Notice that the Preliminary Injunction Order has been executed and upon such filing, the case would be immediately deemed unsealed, including the docket and all previously sealed documents without further action.

Plaintiff respectfully requests that should the Court decide not to grant the *ex parte* temporary relief requested in Plaintiff's TRO Application, that the materials be sealed indefinitely.

Dated: December 1, 2021

Respectfully submitted,



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