

**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: 1:21-cv-01346
(LMB) (TCB)

**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* Motion to Supplement Preliminary Injunction Order, and the following documents in particular, filed by Plaintiff in this action:

1. The Motion for Protective Order Sealing Documents and accompanying documents, including the Brief in support of the Motion;
2. The declaration of Kayvan M. Ghaffari in Support of Motion for Protective Order Sealing Documents;
3. Plaintiff's *Ex Parte* Motion to Supplement Preliminary Injunction Order and accompanying documents;
4. The declaration of Christopher Coy in Support of Plaintiff's *Ex Parte* Motion to Supplement Preliminary Injunction and and attachments thereto;
5. [Proposed] Supplemental Preliminary Injunction Order and accompanying documents.

6. The Supplemental Preliminary Injunction Order and accompanying documents and the instant Order.

Plaintiff respectfully requests that these materials be sealed pending execution of the *ex parte* relief sought in Plaintiff's Motion to Supplement Preliminary Injunction Order, in particular the disabling of the domain names set forth in **Appendix A** to the Motion to Supplement Preliminary Injunction Order. Upon execution of that *ex parte* relief, Plaintiff will file with the Clerk of the Court a Notice that the Supplemental 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 Motion to Supplement Preliminary Injunction Order, that the materials be sealed indefinitely.

Dated: February 28, 2022

Respectfully submitted,

/s/ David J. Ervin

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