IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Microsoft Corporation, a Washington State Corporation, NGO-ISAC, a New York State Non-Profit Organization,

Civil Action No.: 1:24-cv-02719-RC

Plaintiffs,

v.

John Does 1-2, Controlling A Computer Network and Thereby Injuring Plaintiff and Its Customers,

Defendants.

FILED UNDER SEAL PURSUANT TO **LOCAL RULE 5.1**

PLAINTIFFS' FIRST EX PARTE MOTION TO SUPPLEMENT THE PRELIMINARY **INJUNCTION ORDER**

Plaintiff Microsoft Corporation ("Microsoft") and NGO Information Sharing and Analysis Center ("NGO-ISAC") (collectively "Plaintiffs") by their attorneys, pursuant to Federal Rule of Civil Procedure 65(a) and (c), the Computer Fraud and Abuse Act (18 U.S.C. § 1030), the Electronic Communications Privacy Act (18 U.S.C. § 2701), the Lanham Act (15 U.S.C. §§ 1114, 1116, 1125), District of Columbia common law, and the All Writs Act (28 U.S.C. § 1651) respectfully move the Court to supplement the Preliminary Injunction Order.

As discussed in Plaintiffs' accompanying Memorandum in Support of this Ex Parte Motion to Supplement Preliminary Injunction Order and for the same reasons set forth in Plaintiffs' Application for an Ex Parte Temporary Restraining Order and Order to Show Cause Re Preliminary Injunction ("TRO Application"), Plaintiffs request an order to supplement the list of domains identified on September 25, 2024, and subsequently transferred to the control of Microsoft, with newly identified domains being used by Defendants set forth in Appendix A to the Proposed Order filed concurrently with this Motion.

As set forth more fully in Plaintiffs' Memorandum in Support, newly discovered evidence shows that Defendants are rebuilding Star Blizzard's command and control infrastructure in defiance of the Court's authority by bringing online new domains, which Defendants are using in the same illegal manner and for the same illegal purposes described in the TRO Application.

The requested relief is necessary to halt the ongoing Star Blizzard spear phishing operation that is causing irreparable injury to Microsoft, its customers, NGO-ISAC, its members, and the public. Plaintiffs respectfully request that the Court grant this Motion.

Dated: November 5 2024

/s/ Jeffrey L. Poston

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