

FILED

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

2019 DEC 18 A 8:44

CLERK US DISTRICT COURT  
ALEXANDRIA, VIRGINIA

MICROSOFT CORPORATION, a  
Washington corporation,

Plaintiff,

v.

JOHN DOES 1-2 CONTROLLING A  
COMPUTER NETWORK  
THEREBY INJURING PLAINTIFFS  
AND ITS CUSTOMERS,

Defendants.

Civil Action No:

1:19cv1582

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

**MICROSOFT'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") hereby moves for this case and all documents filed in this case be sealed pending execution of the temporary restraining order sought in Microsoft'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 Microsoft 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. Microsoft's *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and accompanying documents;
4. The Declaration of David Anselmi in Support of Microsoft's *Ex Parte*

Application for an Emergency Temporary Restraining Order and Order to  
Show Cause re Preliminary Injunction and attachments thereto;

5. [Proposed] Preliminary Injunction Order and accompanying documents.

Microsoft respectfully requests that these materials be sealed pending execution of the *ex parte* relief sought in Microsoft's TRO Application, in particular the disabling of the domains set forth in **Appendix A** to the Complaint. Upon execution of that *ex parte* relief, Microsoft will file with the Clerk of the Court a Notice that the Preliminary Injunction Order has been executed and thereupon requests that all sealed documents be immediately unsealed.

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

Dated: December 18, 2019

Respectfully submitted,

A handwritten signature in black ink, appearing to read "D. O'Brien", is written over a horizontal line.

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