

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

MICROSOFT CORPORATION, a
Washington corporation, and FS-ISAC, INC.,
a Delaware corporation,

Plaintiffs,

v.

JOHN DOES 1-2, CONTROLLING
COMPUTER BOTNETS AND THEREBY
INJURING PLAINTIFFS, AND THEIR
CUSTOMERS AND MEMBERS,

Defendants.

Civil Action No: 1:20-cv-1171 (AJT/IDD)

**NOTICE OF SUBMISSION OF MATERIALS IN ADVANCE OF
PRELIMINARY INJUNCTION HEARING**

On October 6, 2020, this Court granted Plaintiffs Microsoft Corporation (“Microsoft”) and FS-ISAC, Inc. (“FS-ISAC”)’s Motion for *Ex Parte* Temporary Restraining Order and Order to Show Cause Re Preliminary Injunction. *See* Dkt. No. 28. In its Order, the Court set a hearing for October 20, 2020 at 2 p.m. for Defendants to appear to show cause, if there is any, why this Court should not grant a Preliminary Injunction, enjoining them from the conduct temporarily restrained by the Order. *Id.* Plaintiffs hereby provide additional information and materials in advance of the hearing for this Court’s convenience and to facilitate discussion at the hearing as described below.

Proposed Preliminary Injunction Order

Plaintiffs hereby provide a copy of the proposed Preliminary Injunction Order. *See* Ex. 1. Plaintiffs will email a courtesy copy to Chambers as requested.

Supplemental Brief in Support of Proposed Preliminary Injunction Order

Plaintiffs submit a short supplemental brief in support of the relief requested in the

Preliminary Injunction Order proposing an expedited process to enforce the Court's relief against Defendants on an ongoing basis and to suppress Defendants' illegal activities. *See* Ex. 2.

Service on Defendants

Plaintiffs hereby certify they have emailed, mailed, and, where available, attempted personal service of copies of the Complaint, *Ex Parte* Temporary Restraining Order and Order to Show Cause regarding Preliminary Injunction, Supplemental Temporary Restraining Order, Notice of the Preliminary Injunction Hearing, and all accompanying materials to the last known email and mailing addresses listed below for a variety of entities, as described below, including Defendants and hosting companies and/or data centers that provide services to Defendant.

Plaintiffs provided, as applicable, the Temporary Restraining Order and Supplemental Restraining Order, and notice of this matter to the following hosting providers and/or data centers that Plaintiffs contacted to execute the Temporary Restraining Order. Pursuant to the Temporary Restraining Order and Supplemental Restraining Order, Plaintiffs requested that these third parties provide any available contact information for Defendants. Plaintiffs further requested that, if Defendants contacted these third parties regarding the impact of the Temporary Restraining Order, these third parties refer Defendants to Plaintiffs' counsel:

abuse@ioflood.com

Input Output Flood, LLC d/b/a Ioflood
9030 W. Sahara Ave., Suite 703
Las Vegas, NV 89117

legal@phoenixnap.com
abuse@phoenixnap.com
ipadmin@phoenixnap.com

Input Output Flood, LLC d/b/a Ioflood
c/o Phoenix NAP, LLC d/b/a phoenixNAP
3402 E University Dr. #6
Phoenix, AZ 85034

abuse@he.net

Hurricane Electric LLC
48233 Warm Springs Blvd
Fremont, CA 94539

abuse@nodesdirect.com
noc@nodesdirect.com
info@nodesdirect.com

Nodes Direct Holdings, LLC
1650 Margaret St., Suite 302-351
Jacksonville, FL 32204

abuse@nodesdirect.com
noc@nodesdirect.com
info@nodesdirect.com

Nodes Direct Holdings, LLC
4495 Roosevelt Blvd, Suite 304-241
Jacksonville, FL 32210

abuse@nodesdirect.com
noc@nodesdirect.com
info@nodesdirect.com

Nodes Direct Holdings LCL
c/o Cologix, Inc.
421 W. Church St., Suite 429
Jacksonville, FL 32202

report@virmach.com

Virtual Machine Solutions LLC
1600 Sawtelle Blvd., Suite 308
Los Angeles, CA 90025

report@virmach.com

Virtual Machine Solutions LLC
2801 Robin Rd.
Midwest City, OK 73110

abuse@hostkey.us
aogar@hostkey.com
alex@hostkey.com
info@hostkey.com

Hostkey USA, Inc.
c/o Smyle & Associates
122 East 42nd St., Suite 3900
New York, NY 10168

abuse@hostkey.us
aogar@hostkey.com
alex@hostkey.com
info@hostkey.com

Hostkey USA, Inc.
c/o Webair Internet Development Company, Inc.
501 Franklin Avenue, Suite 200
Garden City, NY 11530

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aogar@hostkey.com
alex@hostkey.com
info@hostkey.com

Hostkey USA, Inc.
c/o Webair Internet Development Company, Inc.
1025 Old Country Road
Westbury, NY 11590

abuse@hostkey.us
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alex@hostkey.com
info@hostkey.com

Hoskey USA, Inc.
c/o Hurricane Electric LLC
501 Franklin Avenue, Suite 200
Garden City, NY 11530

abuse@greenfloid.com
abuse@itldc.com

Green Floid LLC
c/o Business Filings Inc.
1200 South Pine Island Road
Plantation, FL 33324

abuse@greenfloid.com
abuse@itldc.com

Green Floid LLC
c/o Sergey Kashyrin
119 Grimsby St. – Staten Island
New York, NY 10306

abuse@greenfloid.com

Green Floid LLC

abuse@itldc.com	ITL-Bulgaria Ltd. c/o Equinix, Inc. 1920 E. Maple Ave. El Segundo, CA 90245
aol-abuse@performive.com	Twinservers Hosting Solutions, Inc. c/o Performive LLC 1130 Powers Ferry Pl. Marietta, GA 30067
aol-abuse@performive.com	Performive LLC c/o Holt Ney Zatcoff & Wasserman LLP 100 Galleria Parkway, Suite 1800 Atlanta, GA 30339
abuse@securedservers.com legal@securedservers.com	Secured Servers LLC 2353 W. University Dr., Bldg A. Tempe, AZ 85281
conseev@cloudequitygroup.com abuse@conseev.com noc@conseev.com	Cloud Equity Group LLC 14 Wall Street, FL20 New York, NY 10005
conseev@cloudequitygroup.com abuse@conseev.com noc@conseev.com	Conseev LLC 14 Wall Street, FL20 New York, NY 10005
conseev@cloudequitygroup.com abuse@conseev.com noc@conseev.com	Conseev LLC 848 N. Rainbow Blvd. Las Vegas, NY 89107
abuse@cogentco.com	Cogent Communications, Inc. 2450 N Street NW Washington, DC 20037
abuse@TrunkspaceHosting.com	Trunkspace Hosting 925 De Maisonneuve Ouest, Suite 150 Montreal, QC, H3A 0A5
gdn2@hotmail.com abuse@twinservers.net	Twinservers Hosting Solutions, Inc. c/o Dmytro Goryayinov 23 Meadowview Circle Nashua, NH 03062

Plaintiffs provided notice to Defendants by requesting that the following hosting providers and/or data centers associated with IP addresses contained in the Temporary

Restraining Order and Supplemental Restraining Order forward to Defendants those orders, the notice language proposed in Plaintiffs' pleadings and an Internet link to all pleadings filed in this action. These third parties have either ignored our communications or refused to provide Plaintiffs with contact information for Defendants, who are these third parties' customers:

vladimir@king-servers.com abuse@king-servers.com	Hosting Solution Ltd. c/o Vladimir Fomenko 201 Rogers Office Building Edwin Wallace Rey Drive George Hill, Anguilla AI-2640
vladimir@king-servers.com abuse@king-servers.com	Hosting Solution Ltd. c/o Vladimir Fomenko c/o Hurricane Electric LLC 48233 Warm Springs Blvd Fremont, CA 94539
abuse@hostkey.us info@hostkey.com	Hostkey USA Inc. c/o Ivan Bevzyuk 122 East 42nd Street Suite 3900 New York, NY 10168 US
aogar@hostkey.com	Hostkey USA Inc. c/o Antonina Ogar 122 East 42nd Street Suite 3900 New York, NY 10168 US
alex@hostkey.com	Hostkey USA Inc. c/o Alexander Ovchinnikov 122 East 42nd Street Suite 3900 New York, NY 10168 US

The following third parties refused to respond to Plaintiffs' requests pursuant to the Temporary Restraining Order, including Plaintiffs request that these third parties provide any available contact information for Defendants. Notwithstanding service of process by mail and email, these third parties have refused to respond at all. In some cases, these parties also provided false information regarding their operations, which could not be located.

abuse@volumedrive.com info@volumedrive.com support@volumedrive.com	VolumeDrive, Inc. c/o Joshua Bohanon 320 Scott Rd.
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volumedrive@gmail.com	South Abington Township, PA 18411-9368
josh1042@hotmail.com	VolumeDrive, Inc. c/o Joshua Bohanon 9 E Market St, Suite A, Wilkes Barre, PA 18701 Luzerne County
josh1042@hotmail.com	VolumeDrive, Inc. c/o Joshua Bohanon 1143 Northern Blvd South Abington Township, PA 18411-2221 Lackawanna County
keith@fastlink.net abuse@fastlink.net noc@fastlink.net brock.courneya@gmail.com brock.courneya@xnstg.com	Fastlink Network, Inc. c/o Brock Courneya, President 624. S. Grand Ave. Los Angeles, CA 90017
keith@fastlink.net abuse@fastlink.net noc@fastlink.net brock.courneya@gmail.com brock.courneya@xnstg.com	Fastlink Network, Inc. Fastlink Network – Newtrend Division c/o Brock Courneya, President P.O. Box 17295 Encino, CA 91416
keith@fastlink.net abuse@fastlink.net noc@fastlink.net brock.courneya@gmail.com brock.courneya@xnstg.com	Fastlink Network, Inc. c/o Incorp Services, Inc. 5716 Corsa Ave, Suite 110 Westlake Village, CA 9136

Plaintiffs provided notice to Defendants by sending to the following email addresses used by Defendants, emails attaching and containing the Complaint, Temporary Restraining Order, Supplemental Restraining Order, Notice of the Preliminary Injunction Hearing, the notice language proposed in Plaintiffs' pleadings and an Internet link to all pleadings filed in this action.

lloyd.hyman@protonmail.com
vsr32node@protonmail.com
badroom@keemail.me
vsr32node@protonmail.com

Dated: October 19, 2020

Respectfully submitted,

/s/ Julia Milewski

Julia Milewski (VA Bar No. 82426)
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Washington DC 20004-2595
Telephone: (202) 624-2500
Fax: (202) 628-5116
jmilewski@crowell.com

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Kayvan Ghaffari (*pro hac vice*)
Jacob Canter (*pro hac vice*)
CROWELL & MORING LLP
3 Embarcadero Center, 26th Floor
San Francisco, CA 94111
Telephone: (415) 986-2800
Fax: (415) 986-2827
gramsey@crowell.com
kghaffari@crowell.com

Richard Domingues Boscovich (*pro hac vice*)
MICROSOFT CORPORATION
One Microsoft Way
Redmond, WA 98052-6399
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rbosco@microsoft.com

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FS-ISAC, Inc.*