

**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)

**PLAINTIFFS’ MOTION FOR DEFAULT JUDGMENT
AND PERMANENT INJUNCTION**

Plaintiffs Microsoft Corp. (“Microsoft”) and FS-ISAC, Inc. (“FS-ISAC”) (collectively “Plaintiffs”), by counsel, pursuant to Federal Rules of Civil Procedure 55(b)(2), 53, 65(a) and (c), the Copyright Act (17 U.S.C. § 101, *et seq.*), 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), the common law, the All Writs Act, (28 U.S.C. § 1651) and the Court’s inherent equitable authority, respectfully moves the Court for entry of a default judgment and permanent injunction against the Defendants.

As discussed in Microsoft’s brief in support of this motion for default judgment and permanent injunction, Microsoft requests an order entering default judgment against the Defendants who have failed to answer, plead or otherwise defend this action, and a permanent injunction preventing Defendants from continuing their harmful activities by providing Plaintiffs

control over the existing and newly discovered Trickbot IP addresses and appointing a Court Monitor to oversee Defendants' compliance with the permanent injunction.

The requested relief is necessary to halt the Trickbot operation that is causing irreparable injury to Plaintiffs and its customers. Plaintiffs respectfully request that the Court grant this Motion.

Dated: May 20, 2021

Respectfully submitted,

/s/ Julia Milewski

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*Attorneys for Plaintiffs Microsoft Corp. and
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CERTIFICATE OF SERVICE

I hereby certify that on May 20, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system.

Copies of the forgoing were also served on the defendants listed below by electronic mail:

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c/o

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