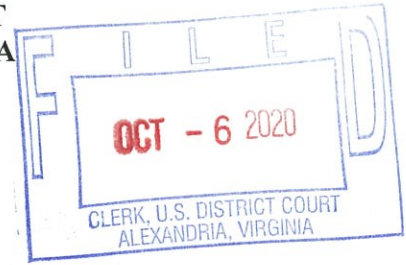


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division



MICROSOFT CORPORATION, a)
Washington corporation, and FS-)
ISAC, INC., a Delaware corporation,)
)
Plaintiffs,)
)
v.)
)
JOHN DOES 1-2, CONTROLLING)
A COMPUTER BOTNET AND)
THEREBY INJURING PLAINTIFFS,)
AND THEIR CUSTOMERS AND)
MEMBERS,)
)
Defendants.)

Civil Action No: 1:20-cv-1171

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

**PLAINTIFFS' MOTION FOR PROTECTIVE ORDER TEMPORARILY
SEALING DOCUMENTS**

Pursuant to Fed. R. Civ. P. 26(c)(1) and Local Civil Rule 5, Plaintiffs Microsoft Corporation ("Microsoft") and FS-ISAC, Inc. ("FS-ISAC"; collectively, "Defendants") hereby move for this case and all documents filed in this case be sealed pending execution of the temporary restraining order sought in Plaintiffs' *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 Plaintiffs 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. Plaintiffs' Complaint;
4. Plaintiffs' *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and

accompanying documents;

5. The declaration of Jason Lyons in Support of Plaintiffs' *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and attachments thereto;
6. The declaration of Rodelio G. Fiñones in Support of Plaintiffs' *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and attachments thereto;
7. The declaration of Steven Silberstein in Support of Plaintiffs' *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and attachments thereto;
8. The declaration of Vikram Thakur in Support of Plaintiffs' *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and attachments thereto;
9. The declaration of Jean-Ian Boutin in Support of Plaintiffs' *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and attachments thereto;
10. The declaration of Kevin Garlow in Support of Plaintiffs' *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and attachments thereto;
11. The declaration of Kayvan M. Ghaffari in Support of Plaintiffs' *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and attachments thereto; and
12. [Proposed] Preliminary Injunction Order and accompanying documents.

Plaintiffs respectfully request that these materials be sealed pending execution of the *ex parte* relief sought in Plaintiffs' TRO Application, in particular the disabling of the IP addresses set forth in **Appendix A** to the Complaint. Upon execution of that *ex parte* relief, Plaintiffs will file with the Clerk of the Court a Notice that the Preliminary Injunction Order has been executed and thereupon such filing would immediately unseal all previously sealed documents without further action.

Plaintiffs respectfully request that should the Court decide not to grant the *ex parte* temporary relief requested in Plaintiffs' TRO Application, that the materials be sealed

indefinitely.

Dated: October 5, 2020

Respectfully submitted,



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