

# **EXHIBIT 2**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Microsoft Corporation, a Washington State  
Corporation and Health-ISAC, Inc., a Florida non-  
profit organization,

Plaintiffs,

v.

Saad Fridi,

and

John Does 1-4, Controlling A Computer Network and  
Thereby Injuring Plaintiffs and Their Customers,

Defendants.

**Case No.**

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

**PLAINTIFFS' EX PARTE APPLICATION FOR AN EMERGENCY TEMPORARY  
RESTRAINING ORDER AND ORDER TO SHOW CAUSE RE PRELIMINARY  
INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65(b) and (c), Plaintiffs Microsoft Corporation (“Microsoft”) and Health-ISAC, Inc. by counsel, respectfully move the Court for an emergency *ex parte* temporary restraining order and an order to show cause why a preliminary injunction should not issue against Defendants Saad Fridi and John Does 1-4 (“Tycoon 2FA Defendants”).

As discussed in Plaintiffs’ Memorandum in Support of this Application, Tycoon 2FA Defendants developed phishing kits and are engaged in an ongoing, illegal Internet-based phishing operation that sells, distributes, and implements these phishing kits. These Tycoon 2FA phishing kits are designed to steal sensitive information from Microsoft customers that is then used to perpetrate additional cybercrimes including compromising business email, ransomware, malware, and financial fraud. Tycoon 2FA Defendants leverage Internet domains as part of an Internet infrastructure for the phishing operation.

Plaintiffs assert the Defendants are liable under and have violated (1) the Computer Fraud and Abuse Act, 18 U.S.C. § 1030; (2) the Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. § 1962 and 18 U.S.C. § 1962(d); (3) the Electronic Communications Privacy Act, 18 U.S.C. § 2701; (4) False Designation of Origin under the Lanham Act, 15 U.S.C. § 1125(a); (5) Trademark Infringement under the Lanham Act, 15 U.S.C. § 1114 et seq.; (6) Trademark Dilution under the Lanham Act, 15 U.S.C. § 1125(c); (7) common law trespass to chattels; (8) common law conversion; and (9) common law unjust enrichment,

The requested relief is necessary to halt the growth of Tycoon 2FA Defendants' unlawful activity by disabling Internet domains associated with Tycoon 2FA Defendants' Internet infrastructure. As discussed in Plaintiffs' Memorandum in support of this Application, *ex parte* relief is essential because if Tycoon 2FA Defendants are given prior notice, they will be able to destroy, move, conceal, or otherwise make inaccessible the facilities through which Tycoon 2FA Defendants direct the harmful activity and will significantly impede, if not preclude, Plaintiffs' ability to obtain effective relief against Tycoon 2FA Defendants. That is because Tycoon 2FA Defendants are highly sophisticated cybercriminals capable of quickly adapting the Internet infrastructure used to secretly establish themselves on a victim's network.

Plaintiffs' Application is based on this Application; Plaintiffs' Memorandum in Support of this Application; the Declarations of Derek Richarson, Errol Weiss, Selena Larson and Jeffrey L. Poston, in support of Plaintiffs' Application and the exhibits attached thereto; the pleadings on file in this action; and on such argument and evidence as may be presented at the hearing on this Application.

Plaintiffs further respectfully request oral argument on this motion to be set for February 24, 2026 or as soon thereafter as the Court deems possible.

Dated: February 24, 2026

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