

**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.

Civil Action No. 1:26-cv-01603-DLC

**NOTICE OF MOTION FOR
DEFAULT JUDGMENT AND PERMANENT INJUNCTION**

PLEASE TAKE NOTICE that on October 20, 2026, at 1:00 p.m., or as soon thereafter as this matter may be heard before Judge Denise L. Cote in Courtroom 18B of Daniel Patrick Moynihan Courthouse in the Southern District of New York, located at 500 Pearl Street, New York, New York 10007, Plaintiffs Microsoft Corporation (“Microsoft”) and Health-ISAC, Inc., (collectively, “Plaintiffs”) will move, pursuant to Federal Rule of Civil Procedure 55(b)(2), for an Order Granting Plaintiffs’ Motion for Default Judgment and Permanent Injunction against Saad Fridi and John Does 1-4 (collectively “Tycoon 2FA Defendants”) named in this lawsuit in connection with Plaintiffs’ claims for relief pursuant to: (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; (3) Conspiracy to Violate the Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. § 1962(d); (4) the Electronic Communications Privacy Act, 18 U.S.C. § 2701; (5) False Designation of Origin under the Lanham Act, 15 U.S.C. § 1125(a); (6) Trademark Infringement under the

Lanham Act, 15 U.S.C. § 1114 et seq.; (7) Trademark Dilution under the Lanham Act, 15 U.S.C. § 1125(c); (8) common law trespass to chattels; (9) conversion; and (10) unjust enrichment.

The relief sought by Plaintiffs is made upon the accompanying Memorandum of Law for Default Judgment and Permanent Injunction, and the Proposed Order filed concurrently, together with all pleadings and papers previously filed in connection with this matter.

Dated: October 9, 2026

Respectfully submitted,

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