

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

MICROSOFT CORPORATION, a Washington Corporation, FORTRA, LLC, a Delaware Limited Liability Company, and HEALTH-ISAC, INC., a Florida Corporation,

Plaintiffs,

v.

JOHN DOES 1-2, JOHN DOES 3-4 (AKA CONTI RANSOMWARE GROUP), JOHN DOES 5-6 (AKA LOCKBIT RANSOMWARE GROUP), JOHN DOES 7-8 (AKA DEV-0193), JOHN DOES 9-10 (AKA DEV-0206), JOHN DOES 11-12 (AKA DEV-0237), JOHN DOES 13-14 (AKA DEV-0243), JOHN DOES 15-16 (AKA DEV-0504), Controlling Computer Networks and Thereby Injuring Plaintiffs and Their Customers,

Defendants.

Case No. 23-cv-2447-LDH-JRC

**FILED UNDER SEAL**

**PLAINTIFFS' *EX PARTE* MOTION FOR A SECOND  
SUPPLEMENTAL PRELIMINARY INJUNCTION ORDER**

Plaintiffs Microsoft Corporation (“Microsoft”), Fortra, LLC (“Fortra”), and Health-ISAC, Inc., (“H-ISAC”) (collectively “Plaintiffs”), by counsel, pursuant to Federal Rule of Civil Procedure 65(b) and (c), the Digital Millennium Copyright Act (17 U.S. § 1201), the Copyright Act (17 U.S.C. §§ 101 *et seq.*), Computer Fraud and Abuse Act, 18 U.S.C. § 1030, Trademark Infringement under the Lanham Act, 15 U.S.C. § 1114 *et seq.*, False Designation of Origin under the Lanham Act, 15 U.S.C. § 1125(a), Trademark Dilution under the Lanham Act, 15 U.S.C. § 1125(c), the Racketeer Influenced and Corrupt Organizations Act (18 U.S.C. § 1962), Common Law Trespass to Chattels, Unjust Enrichment, and Conversion, respectfully moves the Court for a Second Supplemental Preliminary Injunction Order.

As discussed in Plaintiffs’ brief in support of this *Ex Parte* Motion for a Second

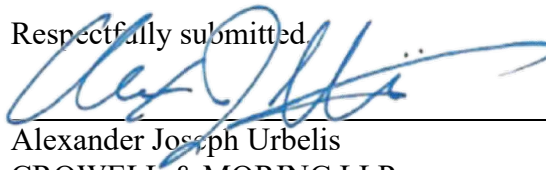
Supplemental Preliminary Injunction Order contemporaneously filed and for the same reasons set forth in Plaintiffs' Application for an *Ex Parte* Temporary Restraining Order and Order to Show Cause re Preliminary Injunction ("TRO Application") and Plaintiff's *Ex Parte* Motion to Supplement the Preliminary Injunction ("First Supplemental Preliminary Injunction Motion"), Plaintiffs request an order allowing them to supplement the list of domains that were subject to the prior Court Orders dated March 30, 2023 and June 16, 2023, with the new domains being used by Defendants set forth in **Appendix A** to the Proposed Order filed concurrently with this Motion.

As set forth more fully in Plaintiffs' brief, recent evidence shows that Defendants are again rebuilding the cracked Cobalt Strike infrastructure in defiance of the Court's authority, by registering new malicious domains, which Defendants are using in the same illegal manner and for the same illegal purposes described in the TRO Application and First Supplemental Preliminary Injunction Motion.

The requested relief is necessary to halt the cracked Cobalt Strike operation that is causing irreparable injury to Plaintiffs and their customers. Plaintiffs respectfully request that the Court grant this Motion.

Dated: September 27, 2023

Respectfully submitted,



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