

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

Microsoft Corporation, a Washington State Corporation and LF Projects, LLC, a Delaware State Series Limited Liability Company,

Plaintiffs,

v.

Abanoub Nady (also known as MRxCODER),

and

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

Defendants.

Civil Action No.

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

**DECLARATION OF JEFFREY L. POSTON IN SUPPORT OF PLAINTIFFS' MOTION
FOR LEAVE TO EXCEED PAGE LIMITS RE: PLAINTIFFS' TRO APPLICATION**

I, Jeffrey L. Poston, hereby declare and state as follows:

1. I am a partner at the law firm of Crowell & Moring LLP ("Crowell"), and counsel of record, for Plaintiffs Microsoft Corporation ("Microsoft") and LF Projects, LLC ("LF Projects"). I make this declaration in support of Plaintiffs' Motion for Leave To Exceed Page Limits Re: Plaintiffs' TRO Application. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. Contemporaneously with the filing of this Motion for Leave to Exceed Page Limits, Plaintiffs are filing an Application for an Emergency *Ex Parte* Temporary Restraining Order and Order to Show Cause ("TRO Application") as well as other case-opening documents.

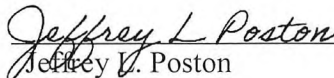
3. Due to the complexity of Plaintiffs' claims, the number of claims Plaintiffs are

asserting against the Fake ONNX Defendants, the intricacies of Fake ONNX's phishing criminal operations, and the technical sophistication of Fake ONNX Defendants, Plaintiffs' brief in support of the TRO Application is 46 pages.

4. Additionally, because the brief in support of the TRO Application analyzes and explains the complex issues of directing third party registries to take action pursuant to the All Writs Act, why *ex parte* relief is necessary, and the explanation of proposed alternative service methods to ensure that the unidentified John Doe cybercriminals are properly afforded their due process rights all merit enlargement of the page limitation such that Plaintiffs are given a full opportunity to describe the extensive factual predicate for their TRO Application.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 12th day of November, 2024 in Washington D.C.



Jeffrey L. Poston