

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

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

Plaintiffs,

v.

Abanoub Nady (also known as MRxC0DER),

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**

**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 LF Projects, LLC ("LF Projects") by their attorneys, 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. Plaintiffs' Complaint and Appendices in support thereof;
2. Civil Cover Sheet;
3. Summons to Abanoub Nady and John Does 1-4
4. Application for an Emergency *Ex Parte* Temporary Restraining Order and Order to Show

- Cause Re: Preliminary Injunction;
5. Brief in Support of Emergency *Ex Parte* Temporary Restraining Order and Order to Show Cause Re: Preliminary Injunction;
 6. [Proposed] Order Granting Plaintiffs' Application for a Temporary Restraining Order and Order to Show Cause Re: Preliminary Injunction;
 7. Declaration of Jason B. Lyons in Support of Plaintiffs' Application for an Emergency *Ex Parte* Temporary Restraining Order and Order to Show Cause Re: Preliminary Injunction;
 8. Declaration of Michael Dolan in Support of Plaintiffs' Application for an Emergency *Ex Parte* Temporary Restraining Order and Order to Show Cause Re: Preliminary Injunction;
 9. Declaration of Jeffrey L. Poston in Support of Plaintiffs' Application for an Emergency *Ex Parte* Temporary Restraining Order and Order to Show Cause Re: Preliminary Injunction;
 10. Motion for Protective Order Temporarily Sealing Documents;
 11. Brief in Support of Motion for Protective Order Temporarily Sealing Documents;
 12. Declaration of Jeffrey L. Poston in Support of Motion for Protective Order Temporarily Sealing Documents;
 13. [Proposed] Order Granting Plaintiffs' Motion for Protective Order Temporarily Sealing Documents;
 14. Motion for Leave to Exceed Page Limits Re: TRO Application
 15. Brief in Support of Motion for Leave to Exceed Page Limits Re: TRO Application
 16. Declaration of Jeffrey L. Poston in Support of Motion for Leave to Exceed Page Limits Re: TRO Application
 17. [Proposed] Order Granting Motion for Leave to Exceed Page Limits Re: TRO

Application; and

18. *Pro Hac Vice* Applications for Jeffery L. Poston, Garylene Javier, and Anna Z. Saber.

Plaintiffs respectfully requests that these materials be sealed pending execution of the *ex parte* relief sought in Plaintiffs' TRO Application, in particular the disabling of the website domains used by Fraudulent ONNX Defendants to support their phishing operation 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 requests that all sealed documents be immediately unsealed.

Plaintiffs' respectfully requests 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: November 12, 2024



Robbie Rogart Jost (VA Bar No. 84377)

David J. Ervin (VA Bar No. 34719)

Jeffrey L. Poston (*pro hac vice* forthcoming)

Garylene Javier (*pro hac vice* forthcoming)

CROWELL & MORING LLP

1001 Pennsylvania Avenue NW

Washington, DC 20004

T: 202-624-2500

F: 202628-5116

RJost@crowell.com

Dervin@crowell.com

JPoston@crowell.com

GJavier@crowell.com

Amanda (Anna) Z. Saber (*pro hac vice* forthcoming)

CROWELL & MORING LLP

3 Embarcadero Center, 26th Floor

San Francisco, CA 94111

T: 415-986-2800

F: 415-986-2827

ASaber@crowell.com

*Counsel for Plaintiffs Microsoft Corporation and LF
Projects LLC*