

FILED

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

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MICROSOFT CORPORATION, a
Washington corporation,

Plaintiff,

v.

JOHN DOES 1-2, CONTROLLING A
COMPUTER NETWORK AND THEREBY
INJURING PLAINTIFF AND ITS
CUSTOMERS,

Defendants.

CLERK US DISTRICT COURT
ALEXANDRIA, VIRGINIA

Civil Action No: 1:16-cv-993

FILED UNDER SEAL PURSUANT TO
LOCAL RULE 5

**MICROSOFT'S MOTION FOR
PROTECTIVE ORDER TEMPORARILY SEALING DOCUMENTS**

Pursuant to Fed. R. Civ. P. 26(c)(1) and Local Civil Rule 5, Plaintiff Microsoft Corp. ("Microsoft") hereby moves for a protective order temporarily sealing the instant case in general, and the following documents in particular, filed by Microsoft in this action:

1. The instant Motion for Protective Order Sealing Documents and accompanying documents, including the Brief in support of this Motion;
2. Microsoft's Complaint and accompanying documents;
3. *Pro Hac Vice* Applications of Gabriel Ramsey and Jeffrey Cox ;
4. Motion to Exceed Page Limits and accompanying documents;
5. *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and accompanying documents;
6. Brief in Support of *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and accompanying

documents;

7. The Declaration of Jason L. Norton in Support of *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and attachments thereto;
8. The Declaration Jeffrey L. Cox in Support of *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and attachments thereto;
9. [Proposed] *Ex Parte* Temporary Restraining Order and Order To Show Cause Re Preliminary Injunction.

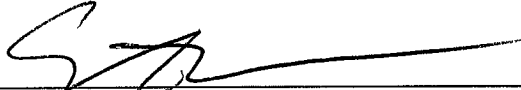
Microsoft respectfully requests that the case in general and these materials be sealed pending execution of the *ex parte* temporary relief sought in Microsoft's Application for Temporary Restraining Order. Microsoft respectfully requests that upon the execution of the temporary restraining order, the instant case be unsealed and the foregoing documents be filed in the public docket. Upon execution of the *ex parte* relief, Microsoft will file with the Clerk of the Court a Notice that the temporary restraining order has been executed. Microsoft further requests that upon execution of the temporary restraining order, Microsoft be permitted to disclose such materials as it deems necessary to commence its efforts to provide Defendants notice of the preliminary injunction hearing and service of the Complaint.

Microsoft respectfully requests that should the Court decide not to grant the *ex parte* temporary relief requested in Microsoft's Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction, that the materials be sealed indefinitely.

Dated: August 2, 2016

Respectfully submitted,

ORRICK, HERRINGTON & SUTCLIFFE
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