

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

MICROSOFT CORPORATION, a
Washington corporation, FS-ISAC,
INC., a Delaware Corporation, H-
ISAC, INC., a Florida corporation,

Plaintiffs,

v.

DENIS MALIKOV, and
JOHN DOES 1-7,

Defendants.

Civil Action No: 1:22-cv-1328-MHC

**PLAINTIFFS’ MOTION FOR DEFAULT JUDGMENT AND PERMANENT
INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 55(b)(2), 53, 65(a), and 65(c), the Computer Fraud and Abuse Act (18 U.S.C. § 1030), the Electronic Communications Privacy Act (18 U.S.C. § 2701), the Lanham Act (15 U.S.C. § 1114 et seq. and 15 U.S.C. § 1125(a),(c)), the Georgia Computer Systems Protection Act (O.C.G.A. § 16-9-93), the Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. § 1962(c)-(d), the common law, the All Writs Act (28 U.S.C. § 1651) and the Court’s inherent equitable authority, Plaintiffs Microsoft Corporation (“Microsoft”), FS-ISAC, Inc. (“FS-ISAC”), and H-ISAC, Inc. (“H-ISAC”) (collectively “Plaintiffs”) respectfully moves the Court for an entry of default judgment and permanent

injunction against Defendants Denis Malikov and John Does 1-7 (collectively “Defendants”).

As discussed in Plaintiffs’ brief in support of this motion for default judgment and permanent injunction, Plaintiffs’ request an order entering default judgment against the Defendants who have failed to answer, plead, or otherwise defend this action, and a permanent injunction preventing Defendants from continuing their harmful activities by providing Microsoft control over the existing ZLoader domains.

The requested relief is necessary to halt the ZLoader operation that is causing irreparable injury to Plaintiffs and their customers. Plaintiffs respectfully requests that the Court grant this Motion.

Dated: November 17, 2022 Respectfully submitted,

/s/ Joshua D. Curry

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