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

2015 FEB 20 A 9: 20

MICROSOFT CORPORATION, a Washington corporation, and FS-ISAC, INC., a Delaware corporation,) CLERK US DISTRICT COURT) ALEXANDRIA, VIRGINIA)
Plaintiffs,))
V.) Civil Action No: [:15 av 240 LMB/10D
JOHN DOES 1-3, CONTROLLING A COMPUTER BOTNET THEREBY INJURING PLAINTIFFS AND THEIR CUSTOMERS AND MEMBERS,	FILED UNDER SEAL PURSUANT TO LOCAL CIVIL RULE 5
Defendants.))
)))

[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION FOR A PROTECTIVE ORDER TEMPORARILY SEALING DOCUMENTS

Before the Court is Plaintiffs' Motion for a Protective Order Temporarily Sealing

Documents. Upon consideration of the Motion, the pleadings filed herein, the arguments of
counsel, and the Court finding that the arguments of applicable rules and Fourth Circuit

precedent are satisfied, that the requested order is the least restrictive means available to protect
the interests of Plaintiffs and the public, and that there is a compelling need to enter a temporally
limited sealing order, THEREFORE it is hereby ORDERED that the instant case and the
following documents be filed and maintained UNDER SEAL in accordance with Fed. R. Civ. P.

26(c)(1) and Local Civil Rule 5, pending execution of both the temporary restraining order
requested in Plaintiffs' Ex Parte Application for Emergency Temporary Restraining Order And
Order To Show Cause re Preliminary Injunction concurrently filed in this matter on February 20,
2015:

- 1. The instant Motion for Protective Order Temporarily Sealing Documents and attachments hereto, including the Non-Confidential Brief in support of this Motion;
- 2. Plaintiffs' Complaint and attachments thereto;
- 3. *Pro Hac Vice* Applications of Richard Boscovich, Gabriel Ramsey, Jeffery Cox, Jacob Heath, and Robert Uriarte;
- 4. Motion to Exceed Page Limits and Attachments thereto;
- 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;
- 7. The Declaration of Vikram Thakur in Support of *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and Exhibits thereto;
- 8. The Declaration of Jason Lyons in Support of *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and Exhibits thereto;
- 9. The Declaration Jacob Heath in Support of *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and Exhibits thereto;
- 10. The Declaration of Eric Guerrino in Support of Ex Parte Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and Exhibits thereto;
- 11. The Declaration of Tim Liu in Support of *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and Exhibits thereto;
- 12. The Declaration of Karthik Selvaraj in Support of *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary

Injunction and Exhibits thereto; and

13. [Proposed] Ex Parte Temporary Restraining Order and Order To Show Cause Re

Preliminary Injunction.

IT IS FURTHER ORDERED that, immediately upon execution of the temporary

restraining order sought by Plaintiffs in the Application for TRO, the instant case shall be

unsealed and the foregoing documents shall be filed in the public docket.

IT IS FURTHER ORDERED that upon execution of the ex parte relief sought in the

Application for TRO, Plaintiffs shall file with the Clerk of the Court a Notice that the temporary

restraining order has been executed, and Plaintiffs shall be permitted to disclose such material as

deemed necessary, including in order to commence their efforts to provide Defendants notice of

the preliminary injunction hearing and service of the Complaint by publication and other means.

IT IS FURTHER ORDERED that in the event the Court elects not to grant Plaintiffs'

TRO Application, these materials shall remained sealed until such time as public filing of these

materials will no longer present a risk of preventing Plaintiffs from obtaining effective relief on

their claims.

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IT IS SO ORDERED.

Entered this _	day of	, 2014.	
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United States District Judge

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