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15 Attorneys for Plaintiff
16 MICROSOFT CORPORATION

17 UNITED STATES DISTRICT COURT

18 DISTRICT OF NEVADA

19
20 MICROSOFT CORPORATION,

21 Plaintiff,

22 vs.

23 VITALWERKS INTERNET SOLUTIONS,
24 LLC, d/b/a NO-IP.com; NASER AL MUTAIRI,
an individual; MOHAMED BENABDELLAH,
25 an individual; and DOES 1-500,

26 Defendants.
27
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) Case No. 14-cv-0987

) **FILED UNDER SEAL**

) **APPLICATION OF MICROSOFT
CORPORATION FOR AN EMERGENCY
TEMPORARY RESTRAINING ORDER
AND ORDER TO SHOW CAUSE
REGARDING PRELIMINARY
INJUNCTION**

1 Plaintiff Microsoft Corporation (“Microsoft”), by counsel, pursuant to Federal Rule of Civil
2 Procedure 65(a) and (b), the Computer Fraud and Abuse Act (18 U.S.C. § 1030), the Anti-
3 Cybersquatting Consumer Protection Act (15 U.S.C. § 1125), Nevada’s Unlawful Acts Regarding
4 Computers and Information Services (N.R.S. § 205.4765), the common law, and the All Writs Act
5 (28 U.S.C. § 1651), respectfully moves the Court for an emergency *ex parte* temporary restraining
6 order and order to show cause why a preliminary injunction should not issue.

7 As discussed in Microsoft’s brief in support of this motion, Microsoft requests an order that
8 will allow it to enjoin the spread of Bladabindi/Jenxcus malware and to block traffic between
9 personal computers infected with said malware and domains registered to Defendant Vitalwerks,
10 through which Defendants Mutairi, Benabdellah, and Does 1-500 (“Malware Defendants”)
11 communicate with the infected computers. The requested relief is necessary to halt the illegal
12 malware-related activity enabled by No-IP domains, which is causing irreparable injury to
13 Microsoft, its customers, and the general public. Therefore, Microsoft respectfully requests that the
14 Court grant this motion.

15 Microsoft further respectfully requests oral argument on this motion to be set for June 19
16 2014 at 2:00 p.m., or as soon as it may be heard.

17
18 Dated: June 19, 2014

Respectfully submitted,

SHOOK, HARDY & BACON, L.L.P.

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21 */s/ Tony M. Diab*

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23 TONY M. DIAB
24 Attorneys for Plaintiff Microsoft Corporation
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