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16 MICROSOFT CORPORATION

17 UNITED STATES DISTRICT COURT

18 DISTRICT OF NEVADA

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20 MICROSOFT CORPORATION,

21 Plaintiff,

22 vs.

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

26 Defendants.
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) Case No.

) **FILED UNDER SEAL**

) **MICROSOFT CORPORATION'S MOTION
TO SEAL DOCUMENTS**

1 Pursuant to Fed. R. Civ. P. 26(c)(1) and Local Rule 10-5, Plaintiff Microsoft Corporation
2 moves for an order sealing this case and the following specific documents, filed by Microsoft in this
3 action:

- 4 1. Complaint;
- 5 2. Application of Microsoft Corporation for an Emergency Temporary Restraining
6 Order and Order to Show Cause Regarding Preliminary Injunction;
- 7 3. Memorandum in Support of Application of Microsoft Corporation for an Emergency
8 Temporary Restraining Order and Order to Show Cause Regarding Preliminary
9 Injunction;
- 10 4. Declaration of Jason Lyons in Support of Application of Microsoft Corporation for an
11 Emergency Temporary Restraining Order and Order to Show Cause Regarding
12 Preliminary Injunction, including all attached Exhibits;;
- 13 5. Declaration of David Anselmi in Support of Application of Microsoft Corporation for
14 an Emergency Temporary Restraining Order and Order to Show Cause Regarding
15 Preliminary Injunction, including all attached Exhibits;
- 16 6. Declaration of Francis Tan Seng in Support of Application of Microsoft Corporation
17 for an Emergency Temporary Restraining Order and Order to Show Cause Regarding
18 Preliminary Injunction, including all attached Exhibits;
- 19 7. Declaration of Randall D. Haimovici in Support of Application of Microsoft
20 Corporation for an Emergency Temporary Restraining Order and Order to Show
21 Cause Regarding Preliminary Injunction, including all attached Exhibits; and
- 22 8. [Proposed] Ex Parte Temporary Restraining Order and Order To Show Cause
23 Regarding Preliminary Injunction.

24 Microsoft requests that the case and these materials be sealed until Microsoft is able to
25 execute the Temporary Restraining Order (“TRO”) it is seeking from this Court, after which time the
26 materials may be filed in the public docket. In addition, Microsoft requests that upon effecting the
27 TRO, that Microsoft be permitted to disclose such materials as it deems necessary, including to
28 commence its efforts to provide Defendants notice of the preliminary injunction hearing and service

1 of the Complaint. Should the Court decide not to grant the *ex parte* temporary relief requested in
2 Microsoft's Temporary Restraining Order, Microsoft requests that the materials be sealed
3 indefinitely.

4 Dated: June 19, 2014

Respectfully submitted,

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

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/s/ Tony M. Diab

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TONY M. DIAB

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Attorneys for Plaintiff Microsoft Corporation

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