

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

MICROSOFT CORPORATION,)	
)	
Plaintiff,)	
)	
v.)	Case No. <u>1:25-CV-2695-MHC</u>
)	
DOES 1-10,)	<u>FILED UNDER SEAL</u>
)	
Defendants.)	
)	
)	
)	

**PLAINTIFFS' MOTION FOR
PROTECTIVE ORDER TEMPORARILY SEALING DOCUMENTS**

Pursuant to Fed. R. Civ. P. 26(c)(1), Plaintiff Microsoft Corporation hereby moves for a protective order temporarily sealing the following documents filed by Plaintiff in this action:

1. Application of Microsoft Corporation For An Emergency *Ex Parte* Order For Temporary Restraining Order and Related Relief;
2. Brief in Support of Application of Microsoft Corporation For An Emergency *Ex Parte* Order For Temporary Restraining Order and Related Relief;
3. Emergency Motion to Waive Time Requirements;

4. [Proposed] Order Granting Application of Microsoft Corporation For An Emergency *Ex Parte* Order For Temporary Restraining Order and Related Relief;
5. Declaration of Derek Richardson in Support of Application of Microsoft Corporation For An Emergency *Ex Parte* Order For Temporary Restraining Order and Related Relief, and exhibits thereto;
6. Declaration of Igor Aronov in Support of Application of Microsoft Corporation For An Emergency *Ex Parte* Order For Temporary Restraining Order and Related Relief, and exhibits thereto;
7. Declaration of Rodelio Finones in Support of Application of Microsoft Corporation For An Emergency *Ex Parte* Order For Temporary Restraining Order and Related Relief, and exhibits thereto;
8. Declaration of Jakub Tomanek in Support of Application of Microsoft Corporation For An Emergency *Ex Parte* Order For Temporary Restraining Order and Related Relief, and exhibits thereto;
9. Declaration of Robert Uriarte in Support of Application of Microsoft Corporation For An Emergency *Ex Parte* Order For Temporary Restraining Order and Related Relief;

10. Plaintiff's Motion for Leave to Exceed Page Limits Re: Application of Microsoft Corporation For An Emergency *Ex Parte* Order For Temporary Restraining Order and Related Relief;
11. Brief in Support of Plaintiff's Motion for Leave to Exceed Page Limits Re: Application of Microsoft Corporation For An Emergency *Ex Parte* Order For Temporary Restraining Order and Related Relief;
12. [Proposed] Order Granting Plaintiff's Motion for Leave to Exceed Page Limits Re: Application of Microsoft Corporation For An Emergency *Ex Parte* Order For Temporary Restraining Order and Related Relief;
13. Motion for Protective Order Temporarily Sealing Documents;
14. Brief in Support of Motion for Protective Order Temporarily Sealing Documents;
15. Declaration of Robert Uriarte in Support of Motion for Protective Order Temporarily Sealing Documents;
16. [Proposed] Order Granting Plaintiff's Motion for Protective Order Temporarily Sealing Documents;
17. Plaintiff's Motion for Issuance of Summons and Authorization to Serve Process on Defendants by Electronic Means Pursuant to Fed. R. Civ. P. 4(f)(3);

18. Brief in Support of Plaintiff's Motion for Issuance of Summons and

Authorization to Serve Process on Defendants by Electronic Means Pursuant to Fed. R. Civ. P. 4(f)(3);

19. [Proposed] Order Granting Plaintiff's Motion for Issuance of Summons and

Authorization to Serve Process on Defendants by Electronic Means Pursuant to Fed. R. Civ. P. 4(f)(3);

20. Plaintiff's *Ex Parte* Motion for Expedited Discovery;

21. Brief in Support of Plaintiff's *Ex Parte* Motion for Expedited Discovery;

22. [Proposed] Order Granting Plaintiff's *Ex Parte* Motion for Expedited Discovery;

23. *Pro Hac Vice* Applications for Robert L. Uriarte, Jacob Heath, Lauren Baron, and Ana Mendez-Villamil.

Plaintiff respectfully requests that the case in general and these materials be sealed pending execution of the *ex parte* temporary relief sought in the Application of Microsoft Corporation For An Emergency *Ex Parte* Order For Temporary Restraining Order and Related Relief. Plaintiff 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, Plaintiff will file with the Clerk of the Court a Notice that upon the temporary restraining order, Plaintiff 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.

Plaintiff respectfully requests that should the Court decide not to grant the *ex parte* relief requested in the Application of Microsoft Corporation For An Emergency *Ex Parte* Order For Temporary Restraining Order and Related Relief, that the materials be sealed indefinitely.

Dated: May 14, 2025

Respectfully submitted,

/s/ Joshua D. Curry

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CERTIFICATION OF COMPLIANCE

Pursuant to L.R. 7.1(D), N.D. Ga., counsel for Plaintiff hereby certifies that this Motion has been prepared with one of the font and point selections approved by the Court in L.R. 5.1, N.D. Ga.

Dated: May 14, 2025

/s/ Joshua D. Curry