

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

MICROSOFT CORPORATION,)
)
 Plaintiff,)
)
 v.) Case No. _____
)
DOES 1-6,) **FILED UNDER SEAL**
)
 Defendants.)
)
)
)

**PLAINTIFFS’ MOTION FOR
PROTECTIVE ORDER TEMPORARILY SEALING
THIS CASE AND CERTAIN DOCUMENTS**

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

1. Plaintiff’s Complaint, and the attachments thereto
2. Civil Cover Sheet
3. Certificate of Interested Persons and Corporate Disclosure Statement Pursuant to Fed. R. Civ. P. 7.1
4. Application of Microsoft Corporation For An Emergency *Ex Parte* Order For Temporary Restraining Order and Related Relief

5. Brief in Support of Application of Microsoft Corporation For An Emergency *Ex Parte* Order For Temporary Restraining Order and Related Relief
6. Emergency Motion to Waive Time Requirements
7. [Proposed] Order Granting Application of Microsoft Corporation For An Emergency *Ex Parte* Order For Temporary Restraining Order and Related Relief
8. 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
9. Motion for Protective Order Temporarily Sealing Documents
10. Brief in Support of Motion for Protective Order Temporarily Sealing Documents
11. Declaration of Robert Uriarte in Support of Motion for Protective Order Temporarily Sealing Documents
12. [Proposed] Order Granting Plaintiff's Motion for Protective Order Temporarily Sealing Documents
13. 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)

14. 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)

15. [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)

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: November 12, 2025

Respectfully submitted,

/s/Joshua D. Curry

Joshua D. Curry

Joshua D. Curry (Georgia Bar No. 117378)
Jonathan D. Goins (Georgia Bar No. 738593)
Abigail Van Horn (Georgia Bar No. 253790)
LEWIS BRISBOIS BISGAARD & SMITH LLP
600 Peachtree Street NE, Suite 4700
Atlanta, GA 30308
Tel: 404.348.8585
Fax: 404.467.8845
josh.curry@lewisbrisbois.com
jonathan.goins@lewisbrisbois.com
abigail.vanhorn@lewisbrisbois.com

Robert L. Uriarte (*pro hac vice* forthcoming)
ORRICK, HERRINGTON & SUTCLIFFE LLP
355 S. Grand Ave.
Ste. 2700
Los Angeles, CA 90017
Tel: (213) 629-2020
Fax: (213) 612-2499
ruriarte@orrick.com

Of Counsel:

Richard Boscovich
MICROSOFT CORPORATION
Microsoft Redwest Building C
5600 148th Ave NE
Redmond, Washington 98052
Tel: (425) 704-0867
Fax: (425) 936-7329
rbosco@microsoft.com

Attorneys for Plaintiff Microsoft Corporation

CERTIFICATE OF COMPLIANCE

The undersigned counsel hereby certifies that the foregoing was prepared using 14-point Times new Roman font and accordingly complies with Local Rule 5.1. This certificate is given in compliance with Local Rule 7.1(D).

Dated: November 12, 2025

/s/Joshua D. Curry