

PARTIES

2. DXC Technology Company is a Nevada corporation with its principal office at 1775 Tysons Blvd., 9th Floor, Tysons Corner, Virginia 22102.

3. DXC is a provider of technology-enabled business processing, technology services, and other technology-focused services to customers throughout the world. This includes services provided to DXC customers through its Xchanging business.

4. On information and belief, John Doe 1 engaged in a coordinated attack on some of DXC's systems or infrastructure designed to injure DXC and its reputation, brand and goodwill. DXC is informed and believes and thereupon alleges that John Doe 1 can likely be contacted directly or through third-parties using the information set forth in **Appendix A**.

5. On information and belief, John Doe 2 engaged in a coordinated attack on some of DXC's systems or infrastructure designed to injure DXC and its reputation, brand and goodwill. DXC is informed and believes and thereupon alleges that John Doe 2 can likely be contacted directly or through third-parties using the information set forth in **Appendix A**.

6. Third party PDR Ltd. d/b/a PublicDomainRegistry.com, a wholly owned subsidiary of Endurance International Group, Ltd., is a domain registrar and is located at 10 Corporate Drive, Burlington, MA 01803.

7. Third party DotSpace Inc. (Radix) is the domain name registry that oversees the registration of all domain names ending in ".space" and is located at F/19, BC1, Ras Al Khaimah FTZ, P.O Box # 16113, Ras Al Khaimah, Ras Al Khaimah 16113 AE.

8. Third party DotWebsite Inc. (Radix) is the domain name registry that oversees the registration of all domain names ending in ".website" and is located at F/19, BC1, Ras Al Khaimah FTZ, P.O Box # 16113, Ras Al Khaimah, Ras Al Khaimah 16113 AE.

9. Third party DotSite Inc. (Radix) is the domain name registry that oversees the registration of all domain names ending in “site” and is located at F/19, BC1, Ras Al Khaimah FTZ, P.O Box # 16113, Ras Al Khaimah, Ras Al Khaimah 16113 AE.

10. Set forth in **Appendix A** are the identities of and contact information for third party domain registries that control the domains used by Defendants.

11. On information and belief, John Does 1-2 jointly own, rent, lease, or otherwise have dominion over infrastructure used to conduct a coordinated attack by defendants on DXC-owned computer systems and infrastructures using a variety of tactics and software tools in order to ultimately deliver and trigger a malicious type of software known as ransomware, which is designed to encrypt electronic files on workstation computers and servers in order to make those files effectively inaccessible and the targeted workstation computers and servers unusable. DXC will amend this complaint to allege the Doe Defendants’ true names and capacities when ascertained. DXC will exercise due diligence to determine Doe Defendants’ true names, capacities, and contact information, and to effect service upon those Doe Defendants.

12. DXC is informed and believes and thereupon alleges that each of the fictitiously named Doe Defendants is responsible in some manner for the occurrences herein alleged, and that DXC’s injuries as herein alleged were proximately caused by such Defendants.

13. On information and belief, the actions and omissions alleged herein to have been undertaken by John Does 1-2 were actions that Defendants, and each of them, authorized, controlled, directed, or had the ability to authorize, control or direct, and/or were actions and omissions each Defendant assisted, participated in, or otherwise encouraged, and are actions for which each Defendant is liable. Each Defendant aided and abetted the actions of Defendants set forth below, in that each Defendant had knowledge of those actions and omissions, provided

assistance and benefited from those actions and omissions, in whole or in part. Each Defendant was the agent of each of the remaining Defendants, and in doing the things hereinafter alleged, was acting within the course and scope of such agency and with the permission and consent of other Defendants.

JURISDICTION AND VENUE

14. The Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 because this action arises out of Defendants' violation of The Computer Fraud and Abuse Act (18 U.S.C. § 1030) and the Electronic Communications Privacy Act, 18 U.S.C. § 2701. The Court also has subject matter jurisdiction over DXC's claims for trespass to chattels, conversion, and unjust enrichment pursuant to 28 U.S.C. § 1367.

15. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(b) because a substantial part of the events or omissions giving rise to DXC's claims has occurred in this judicial district, because a substantial part of the property that is the subject of DXC's claims is situated in this judicial district, and because a substantial part of the harm caused by Defendants has occurred in this judicial district. Defendants have directed their attacks at computer systems and infrastructure owned by DXC Technology Company, which maintains its headquarters in Tysons, Virginia, which resides in the Eastern District of Virginia.

16. Defendants have affirmatively directed actions at Virginia and the Eastern District of Virginia by directing their activities and malicious computer code at computer systems and infrastructures owned by DXC Technology Company, which maintains its headquarters in Tysons, Virginia. Defendants' malicious code communicates with the Internet domains addressed in **Appendix A**, from which the code can download additional malicious files and commands. Defendants have undertaken the acts alleged herein with knowledge that such acts

would cause harm to computer systems and infrastructures owned by DXC Technology Company, which is headquartered in Tysons, Virginia, which resides in the Eastern District of Virginia, thereby injuring DXC in the Eastern District of Virginia and elsewhere in the United States. Therefore, this Court has personal jurisdiction over Defendants.

17. Pursuant to 28 U.S.C. § 1391(b), venue is proper in this judicial district. A substantial part of the events or omissions giving rise to DXC's claims, together with a substantial part of the property that is the subject of DXC's claims, are situated in this judicial district. Venue is proper in this judicial district under 28 U.S.C. § 1391(c) because Defendants are subject to personal jurisdiction in this judicial district.

FACTUAL BACKGROUND

Defendants' Method of Attack

18. Evidence indicates that the defendants operate in the following manner.

19. The infection process started when an attacker gained unauthorized access to a DXC network and infrastructure that is primarily used by the Xchanging business

20. After gaining access to this network, the attacker installed software known as Cobalt Strike BEACON on workstation computers and servers connected to the network. The software has capabilities that can be used for malicious activities. The attacker installed the software using a technique that manipulates otherwise legitimate processes running on targeted computers to execute unauthorized code, which is intended to avoid detection by security tools. Once installed, the software deployed a number of "backdoor" files in those computers. These backdoor files are used by the attacker-installed software to "beacon" out through the Internet from those systems to the attacker's infrastructure in order to establish Internet connections for further use by the attacker. To do this, the attacker-installed software rotates through multiple

different domains that are configured in the backdoor files to try to connect to them and then ultimately to the attacker's infrastructure. This rotation through multiple domains is intended to avoid interruption (e.g., a domain no longer exists) and evade countermeasures (e.g., access to a domain is blocked in that system). The attacker also used a reverse proxy service called Cloudflare to mask the IP address to which traffic to these domains was ultimately connecting.

21. The backdoor files that the attacker deployed on targeted workstation computers and servers were configured to communicate to three (3) attacker-owned domains, as follows:

probes[.]website
probes[.]space
probes[.]site

22. The attacker was then able to use the connections established through the software backdoors to download and deploy ransomware software on workstation computers and servers in the targeted network, which encrypted the files on them and also created a ransom note file that included a request for payment in exchange for decryption of the files. The type of ransomware deployed is novel or at least little-known in the security community.

23. Defendants use these domains in an attempt to deceive DXC's customers and to attack DXC's devices.

24. Defendants appear to have taken steps to disguise their activities, including software installation techniques designed to avoid detection and using software configured to use multiple domains to avoid interruption and evade countermeasures, as well as masking their ultimate IP address through use of Cloudflare.

25. Defendants use these domains in an attempt to mask their activity and to attack DXC-owned systems used by DXC and its customers.

Harm to DXC

26. DXC is a provider of technology-enabled business processing, technology services, and other technology-focused services to customers throughout the world. This includes services provided to DXC customers through its Xchanging business. DXC has invested substantial resources in developing high-quality services, as well as building and operating the computer systems used to provide those services in a reliable and highly available manner. Due to the high quality and effectiveness of DXC's services and the expenditure of significant resources by DXC to market those services, DXC has generated substantial goodwill with its customers, has established a strong brand, and has developed the DXC and Xchanging names into world-wide symbols that are well-recognized within DXC's channels of trade.

27. The activities carried out by the defendants, described above, injure DXC and its reputation, brand and goodwill.

28. DXC is injured because the defendants direct their intrusions to DXC computer systems that are used by DXC to provide services to its customers. DXC must respond to customer service inquiries and issues caused by the defendants and must expend substantial resources dealing with the mitigation of the issue and assisting customers to avoid any injury caused by defendants. DXC has had to expend substantial resources in an attempt to assist its customers and to prevent the misperception that DXC is the source of damage caused by the defendants. For example, DXC must expend resources to remove or otherwise mitigate the impacts of the malicious software used by defendants as discussed above.

29. Customers may incorrectly attribute the negative impact of the defendants to DXC. There is a serious risk that defendants' actions will interfere with DXC's business activities and its relationships with its customers. Defendants' activities create a serious risk of unwarranted impairment of DXC's goodwill and defendants' activities improperly create

perceived risk that interferes with DXC's relationships.

30. Among other things, the defendants install and run software without DXC's or its customers' knowledge or consent, to support the defendants' attacks and to attempt to steal information. The defendants have specifically targeted the DXC-owned systems primarily used by the Xchanging business to provide services to DXC customers. For example, as discussed they execute unauthorized code, deploy unauthorized software and encrypt electronic files, without the consent of DXC or its customers.

31. All of the foregoing activities and circumstances cause injury to DXC.

FIRST CLAIM FOR RELIEF

Violation of the Computer Fraud & Abuse Act, 18 U.S.C. § 1030

32. DXC incorporates by reference each and every allegation set forth in paragraphs above.

33. Defendants knowingly and intentionally accessed and continue to access protected computers without authorization and knowingly caused the transmission of a program, information, code and commands, resulting in damage to the protected computers, the software residing thereon, and DXC.

34. Defendants' conduct involved interstate and/or foreign communications.

35. Defendants' conduct has caused a loss to DXC during a one-year period aggregating at least \$5,000.

36. DXC seeks injunctive relief and compensatory and punitive damages under 18 U.S.C. §1030(g) in an amount to be proven at trial.

37. As a direct result of Defendants' actions, DXC has suffered and continues to suffer irreparable harm for which there is no adequate remedy at law, and which will continue

unless Defendants' actions are enjoined.

SECOND CLAIM FOR RELIEF

Violation of Electronic Communication Privacy Act, 18 U.S.C. § 2701

38. DXC incorporates by reference each and every allegation set forth in paragraphs above.

39. DXC's operating system and DXC's customers' computers are facilities through which electronic communication service is provided to DXC's users and customers.

40. Defendants knowingly and intentionally accessed DXC's operating system, DXC's customers' computers without authorization or in excess of any authorization granted by DXC or any other party.

41. Through this unauthorized access, Defendants intercepted, had access to, obtained and altered authorized access to, wire electronic communications transmitted via DXC's operating system, computers running such software, and DXC's services.

42. DXC seeks injunctive relief and compensatory and punitive damages in an amount to be proven at trial.

43. As a direct result of Defendants' actions, DXC has suffered and continues to suffer irreparable harm for which no adequate remedy at law exists, and which will continue unless Defendants' actions are enjoined.

THIRD CLAIM FOR RELIEF

Common Law Trespass to Chattels

44. DXC incorporates by reference each and every allegation set forth in paragraphs above.

45. Defendants have used a computer and/or computer network, without authority,

with the intent to cause physical injury to the property of another.

46. Defendants have, without authority, used a computer and/or computer network, without authority, with the intent to trespass on the computers and computer networks of Microsoft and its customers.

47. Defendants' actions result in unauthorized access to DXC's operating system and the computers on which such programs and services run and result in unauthorized intrusion into those computers.

48. Defendants intentionally caused this conduct and this conduct was unlawful and unauthorized.

49. Defendants' actions have caused injury to DXC and have interfered with the possessory interests of DXC over its software.

50. DXC seeks injunctive relief and compensatory and punitive damages in an amount to be proven at trial.

51. As a direct result of Defendants' actions, DXC has suffered and continues to suffer irreparable harm for which no adequate remedy at law exists, and which will continue unless Defendants' actions are enjoined.

FOURTH CLAIM FOR RELIEF

Conversion

52. DXC incorporates by reference each and every allegation set forth in paragraphs above.

53. Defendants have interfered with, unlawfully and without authorization, and dispossessed DXC of control over its software and services.

54. Defendants have, without authority, used a computer and/or computer network,

without authority, with the intent to remove, halt, or otherwise disable computer data, computer programs, and/or computer software from a computer or computer network.

55. Defendants have, without authority, used a computer and/or computer network, without authority, with the intent to exfiltrate documents or cause a computer to malfunction.

56. DXC seeks injunctive relief and compensatory and punitive damages in an amount to be proven at trial.

57. As a direct result of Defendants' actions, DXC suffered and continues to suffer irreparable harm for which no adequate remedy at law exists, and which will continue unless Defendants' actions are enjoined.

FIFTH CLAIM FOR RELIEF

Unjust Enrichment

58. DXC incorporates by reference each and every allegation set forth in paragraphs above.

59. The acts of Defendants complained of herein constitute unjust enrichment of the Defendants at the expense of DXC in violation of the common law. Defendants used, without authorization or license, software belonging to DXC to facilitate unlawful conduct inuring to the benefit of Defendants.

60. Defendants profited unjustly from their unauthorized and unlicensed use of DXC's intellectual property.

61. Upon information and belief, Defendants had an appreciation and knowledge of the benefit they derived from their unauthorized and unlicensed use of DXC's intellectual property.

62. Retention by the Defendants of the profits they derived from their malfeasance

would be inequitable.

63. DXC seeks injunctive relief and compensatory and punitive damages in an amount to be proven at trial, including without limitation disgorgement of Defendants' ill-gotten profits.

64. As a direct result of Defendants' actions, DXC suffered and continues to suffer irreparable harm for which there is no adequate remedy at law, and which will continue unless Defendants' actions are enjoined.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray that the Court:

1. Enter judgment in favor of DXC and against the Defendants.
2. Declare that Defendants' conduct has been willful and that Defendants have acted with fraud, malice and oppression.
3. Enter a preliminary and permanent injunction enjoining Defendants and their officers, directors, principals, agents, servants, employees, successors, and assigns, and all persons and entities in active concert or participation with them, from engaging in any of the activity complained of herein or from causing any of the injury complained of herein and from assisting, aiding or abetting any other person or business entity in engaging in or performing any of the activity complained of herein or from causing any of the injury complained of herein.
4. Enter a preliminary and permanent injunction giving DXC control over the domains used by Defendants to cause injury and enjoining Defendants from using such instrumentalities.
5. Enter judgment awarding Plaintiffs actual damages from Defendants adequate to compensate Plaintiffs for Defendants' activity complained of herein and for any injury

complained of herein, including but not limited to interest and costs, in an amount to be proven at trial.

6. Enter judgment disgorging Defendants' profits.
7. Enter judgment awarding enhanced, exemplary and special damages, in an amount to be proved at trial.
8. Enter judgment awarding attorneys' fees and costs, and
9. Order such other relief that the Court deems just and reasonable.

DEMAND FOR JURY TRIAL

DXC respectfully requests a trial by jury on all issues so triable in accordance with Fed.

R. Civ. P. 38.

Dated: July 20, 2020

Respectfully submitted,



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Company*

APPENDIX A

.SPACE DOMAINS

Registrar

PDR Ltd. d/b/a PublicDomainRegistry.com
c/o Endurance International Group Inc.
10 Corporate Drive
Burlington, MA 01803

Registry

DotSpace Inc. (Radix)
F/19, BC1, Ras Al Khaimah FTZ, P.O Box # 16113
Ras Al Khaimah, Ras Al Khaimah 16113
AE
Tel: +1 415 449 4774
Email: contact@radixregistry.com
<http://radixregistry.com/>

Probes.space	Domain Name: PROBES.SPACE Registry Domain ID: Not Available From Registry Registrar WHOIS Server: whois.publicdomainregistry.com Registrar URL: www.publicdomainregistry.com Updated Date: 2020-06-25T12:09:09Z Creation Date: 2020-06-25T12:09:08Z Registrar Registration Expiration Date: 2021-06-25T23:59:59Z Registrar: PDR Ltd. d/b/a PublicDomainRegistry.com Registrar IANA ID: 303 Domain Status: clientTransferProhibited https://icann.org/epp#clientTransferProhibited Registry Registrant ID: Not Available From Registry Registrant Name: Sergey Registrant Organization: Registrant Street: Moscow Registrant City: Moscow Registrant State/Province: Moscow Registrant Postal Code: 143900 Registrant Country: RU Registrant Phone: +7.9124531269 Registrant Phone Ext: Registrant Fax: Registrant Fax Ext: Registrant Email: probeswork666@gmail.com Registry Admin ID: Not Available From Registry Admin Name: Sergey Admin Organization: Admin Street: Moscow Admin City: Moscow Admin State/Province: Moscow
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	Admin Postal Code: 143900 Admin Country: RU Admin Phone: +7.9124531269 Admin Phone Ext: Admin Fax: Admin Fax Ext: Admin Email: probeswork666@gmail.com Registry Tech ID: Not Available From Registry Tech Name: Sergey Tech Organization: Tech Street: Moscow Tech City: Moscow Tech State/Province: Moscow Tech Postal Code: 143900 Tech Country: RU Tech Phone: +7.9124531269 Tech Phone Ext: Tech Fax: Tech Fax Ext: Tech Email: probeswork666@gmail.com Name Server: casey.ns.cloudflare.com Name Server: desiree.ns.cloudflare.com DNSSEC: Unsigned Registrar Abuse Contact Email: abuse- contract@publicdomainregistry.com Registrar Abuse Contact Phone: +1.2013775952 URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/ >>> Last update of WHOIS database: 2020-07-17T01:11:09Z <<< For more information on Whois status codes, please visit https://icann.org/epp Registration Service Provided By: REGWAY.COM
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.WEBSITE DOMAINS

Registrar

**PDR Ltd. d/b/a PublicDomainRegistry.com
c/o Endurance International Group Inc.
10 Corporate Drive
Burlington, MA 01803**

Registry

**DotWebsite Inc. (Radix)
F/19, BC1, Ras Al Khaimah FTZ, P.O Box # 16113
Ras Al Khaimah, Ras Al Khaimah 16113
AE**

Tel: +1 415 449 4774

Email: contact@radixregistry.com

<http://radixregistry.com/>

Probes.website	<p>Domain Name: PROBES.WEBSITE Registry Domain ID: Not Available From Registry Registrar WHOIS Server: whois.publicdomainregistry.com Registrar URL: www.publicdomainregistry.com Updated Date: 2020-06-25T12:09:10Z Creation Date: 2020-06-25T12:09:08Z Registrar Registration Expiration Date: 2021-06-25T23:59:59Z Registrar: PDR Ltd. d/b/a PublicDomainRegistry.com Registrar IANA ID: 303 Domain Status: clientTransferProhibited https://icann.org/epp#clientTransferProhibited Registry Registrant ID: Not Available From Registry Registrant Name: Sergey Registrant Organization: Registrant Street: Moscow Registrant City: Moscow Registrant State/Province: Moscow Registrant Postal Code: 143900 Registrant Country: RU Registrant Phone: +7.9124531269 Registrant Phone Ext: Registrant Fax: Registrant Fax Ext: Registrant Email: probeswork666@gmail.com Registry Admin ID: Not Available From Registry Admin Name: Sergey Admin Organization: Admin Street: Moscow Admin City: Moscow Admin State/Province: Moscow Admin Postal Code: 143900 Admin Country: RU Admin Phone: +7.9124531269 Admin Phone Ext: Admin Fax: Admin Fax Ext: Admin Email: probeswork666@gmail.com Registry Tech ID: Not Available From Registry Tech Name: Sergey Tech Organization: Tech Street: Moscow Tech City: Moscow Tech State/Province: Moscow Tech Postal Code: 143900 Tech Country: RU Tech Phone: +7.9124531269</p>
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	<p>Tech Phone Ext: Tech Fax: Tech Fax Ext: Tech Email: probeswork666@gmail.com Name Server: ajay.ns.cloudflare.com Name Server: tricia.ns.cloudflare.com DNSSEC: Unsigned Registrar Abuse Contact Email: abuse-contact@publicdomainregistry.com Registrar Abuse Contact Phone: +1.2013775952 URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/ >>> Last update of WHOIS database: 2020-07-17T08:08:09Z <<<</p> <p>For more information on Whois status codes, please visit https://icann.org/epp</p> <p>Registration Service Provided By: REGWAY.COM</p>
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.SITE DOMAINS

Registrar

**PDR Ltd. d/b/a PublicDomainRegistry.com
c/o Endurance International Group Inc.
10 Corporate Drive
Burlington, MA 01803**

Registry

**DotSite Inc. (Radix)
F/19, BC1, Ras Al Khaimah FTZ, P.O Box #16113
Ras Al Khaimah, Ras Al Khaimah 16113
AE
Tel: +14153580831
Email: contact@radixregistry.com
<http://www.radixregistry.com>**

<p>Probes.site</p>	<p>Domain Name: PROBES.SITE Registry Domain ID: Not Available From Registry Registrar WHOIS Server: whois.publicdomainregistry.com Registrar URL: www.publicdomainregistry.com Updated Date: 2020-06-25T12:09:09Z Creation Date: 2020-06-25T12:09:08Z Registrar Registration Expiration Date: 2021-06-25T23:59:59Z Registrar: PDR Ltd. d/b/a PublicDomainRegistry.com Registrar IANA ID: 303 Domain Status: clientTransferProhibited https://icann.org/epp#clientTransferProhibited Registry Registrant ID: Not Available From Registry Registrant Name: Sergey</p>
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Registrant Organization:
Registrant Street: Moscow
Registrant City: Moscow
Registrant State/Province: Moscow
Registrant Postal Code: 143900
Registrant Country: RU
Registrant Phone: +7.9124531269
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:
Registrant Email: probeswork666@gmail.com
Registry Admin ID: Not Available From Registry
Admin Name: Sergey
Admin Organization:
Admin Street: Moscow
Admin City: Moscow
Admin State/Province: Moscow
Admin Postal Code: 143900
Admin Country: RU
Admin Phone: +7.9124531269
Admin Phone Ext:
Admin Fax:
Admin Fax Ext:
Admin Email: probeswork666@gmail.com
Registry Tech ID: Not Available From Registry
Tech Name: Sergey
Tech Organization:
Tech Street: Moscow
Tech City: Moscow
Tech State/Province: Moscow
Tech Postal Code: 143900
Tech Country: RU
Tech Phone: +7.9124531269
Tech Phone Ext:
Tech Fax:
Tech Fax Ext:
Tech Email: probeswork666@gmail.com
Name Server: jacob.ns.cloudflare.com
Name Server: mary.ns.cloudflare.com
DNSSEC: Unsigned
Registrar Abuse Contact Email: abuse-
contact@publicdomainregistry.com
Registrar Abuse Contact Phone: +1.2013775952
URL of the ICANN WHOIS Data Problem Reporting System:
<http://wdprs.internic.net/>
>>> Last update of WHOIS database: 2020-07-17T08:09:33Z
<<<

For more information on Whois status codes, please visit
<https://icann.org/epp>