IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

DXC TECHNOLOGY COMPANY, a Nevada corporation,))))
Plaintiff,	
v.)) Civil Action No: 1:20-cv-00814
JOHN DOES 1-2,)))))
Defendants.	
)
)

DXC'S MOTION FOR DEFAULT JUDGMENT AND PERMANENT INJUNCTION

Plaintiff DXC Technology Company ("DXC"), by counsel, pursuant to Federal Rules of Civil Procedure 55(b)(2), 53, 65(a) and (c), the Computer Fraud and Abuse Act (18 U.S.C. § 1030), the Electronic Communications Privacy Act (18 U.S.C. § 2701), the common law, the All Writs Act, (28 U.S.C. § 1651) and the Court's inherent equitable authority, respectfully moves the Court for entry of a default judgment and permanent injunction against the Defendants.

As discussed in DXC's brief in support of this motion for default judgment and permanent injunction, DXC requests an order entering default judgment against the Defendants who have failed to answer, plead or otherwise defend this action, and a permanent injunction preventing Defendants from continuing their harmful activities by providing DXC control over existing domains.

The requested relief is necessary to halt the operation that is causing irreparable injury to DXC and its customers. DXC respectfully requests that the Court grant this Motion.

Dated: December 21, 2020

Respectfully submitted,

Mh

Julia Milewski (VA Bar No. 82426) Matthew Welling (pro hac vice) CROWELL & MORING LLP 1001 Pennsylvania Avenue NW Washington DC 20004-2595 Telephone: (202) 624-2500

Fax: (202) 628-5116 jmilewski@crowell.com mwelling@crowell.com

Gabriel M. Ramsey (pro hac vice) Kayvan M. Ghaffari (pro hac vice) CROWELL & MORING LLP 3 Embarcadero Center, 26th Floor San Francisco, CA 94111 Telephone: (415) 986-2800 Fax: (415) 986-2827

gramsey@crowell.com kghaffari@crowell.com

Attorneys for Plaintiff DXC Technology Company