

**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:
JOHN DOES 1-2,	)	
	)	
	)	
Defendants.	)	<b>FILED UNDER SEAL PURSUANT TO LOCAL RULE 5</b>
	)	
	)	
	)	

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**DXC’S MOTION FOR PROTECTIVE ORDER TEMPORARILY SEALING  
DOCUMENTS**

Pursuant to Fed. R. Civ. P. 26(c)(1) and Local Civil Rule 5, Plaintiff DXC Technology Company hereby moves for this case and all documents filed in this case be sealed pending execution of the temporary restraining order sought in DXC’s *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction (“TRO Application”), and the following documents in particular, filed by DXC in this action:

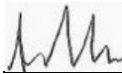
1. The instant Motion for Protective Order Sealing Documents and accompanying documents, including the Brief in support of this Motion;
2. The declaration of Gabriel M. Ramsey in Support of Motion for Protective Order Sealing Documents;
3. DXC’s *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and accompanying documents;
4. The Declaration of Mark Hughes in Support of DXC’s *Ex Parte* Application for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction and attachments thereto;
5. [Proposed] Preliminary Injunction Order and accompanying documents.

DXC respectfully requests that these materials be sealed pending execution of the *ex parte* relief sought in DXC's TRO Application, in particular the disabling of the domains set forth in **Appendix A** to the Complaint. Upon execution of that *ex parte* relief, DXC will file with the Clerk of the Court a Notice that the Temporary Restraining Order has been executed and thereupon requests that all sealed documents be immediately unsealed and deemed unsealed upon the filing of the foregoing Notice.

DXC respectfully requests that should the Court decide not to grant the *ex parte* temporary relief requested in DXC's TRO Application, that the materials be sealed indefinitely.

Dated: July 20, 2020

Respectfully submitted,



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