



information from DXC's servers and networks.

3. I am informed and believe that, for reasons explained in detail in the declaration of Mark Hughes In Support Of DXC's *Ex Parte* Motion for an Emergency Temporary Restraining Order and Order to Show Cause re Preliminary Injunction, filed contemporaneously herewith, permitting Defendants to learn of these proceedings prior to execution of the temporary *ex parte* relief sought in DXC's Preliminary Injunctive Order—in particular the portion to disable the domains in **Appendix A** to the Complaint—would preclude DXC's ability to obtain effective relief against Defendants. This is because Defendants are highly sophisticated cybercriminals capable of quickly adapting the command and control infrastructure used to perpetrate Defendants' unlawful conduct in order to overcome DXC's remediation efforts.

4. I am informed and believe that, absent a protective order, there is a substantial risk that Defendants will learn of these proceedings before the temporary *ex parte* relief to disable the domains in **Appendix A** to the Complaint can be effected and will take steps to evade the relief sought.

5. Over the past ten years, I have been involved with prosecuting over seventeen similar cases. These cases all involved similar litigation strategies and claims and have involved John Doe defendants conducting illegal activities through identifiable but movable online command and control infrastructures similar to that used by Defendants. In several of those cases, I personally observed that Defendants also immediately took action to attempt to defy and evade the court's order as soon as they detected legal action being taken against them.

6. Given the risk that Defendants will attempt to evade the effects of the Court's order if given notice in advance and given my past experience with cases under very similar circumstance as those here, it is my belief that even disclosing that DXC has requested a

Temporary Restraining Order to transfer control of the domains at **Appendix A** to the Complaint gives Defendants the opportunity to adapt the command and control infrastructure so that they can continue to perpetrate their unlawful conduct. For this reason, DXC respectfully requests that all documents filed in this case be temporarily sealed.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge. Executed on this 20th day of July 2020, in San Francisco, California.



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Gabriel M. Ramsey