

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

DXC TECHNOLOGY COMPANY, a)	
Nevada corporation,)	
)	
Plaintiff,)	
)	
v.)	
)	
JOHN DOES 1-2,)	Civil Action No:
)	
)	
Defendants.)	FILED UNDER SEAL PURSUANT TO LOCAL RULE 5
)	
)	
)	
)	

**DXC’S EX PARTE APPLICATION FOR AN
EMERGENCY TEMPORARY RESTRAINING ORDER AND
ORDER TO SHOW CAUSE RE PRELIMINARY INJUNCTION**

Plaintiff DXC Technology Company, by counsel, pursuant to Federal Rule of Civil Procedure 65(b) 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, and the All Writs Act (28 U.S.C. § 1651), respectfully moves the Court for an emergency *ex parte* temporary restraining order and an order to show cause why a preliminary injunction should not issue.

As discussed in DXC’s brief in support of this Application, DXC requests an order transferring to it a number of Internet Domains set forth at **Appendix A** to the Complaint through which John Does 1-2 (“Defendants”) engaged in a coordinated attack, targeting DXC’s computers and networks and apparently intended to remotely execute code and steal information from DXC’s servers and networks. In order to obtain unauthorized access, Defendants have developed a command and control infrastructure comprised of server computers hosting certain

Internet domains (*i.e.* websites). Through this infrastructure, Defendants direct malicious software to DXC's servers and networks.

The requested relief is necessary to halt the growth of Defendants' unlawful activity. As discussed in DXC's brief in support of this Application, *ex parte* relief is essential because if Defendants are given prior notice, they will be able to destroy, move, conceal, or otherwise make inaccessible the facilities through which Defendants direct the harmful activity and will significantly impede, if not preclude, DXC's ability to obtain effective relief against Defendants. That is because Defendants are highly-sophisticated cybercriminals capable of quickly adapting the command and control infrastructure used to carry out their attacks.

DXC's Application is based on: this Application; DXC's Brief In Support Of This Application; the Declarations of Mark Hughes and Matthew Welling in support of DXC's Application and the exhibits attached thereto; the pleadings on file in this action; and on such argument and evidence as may be presented at the hearing on this Application.

Dated: July 20, 2020

Respectfully submitted,



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