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MICROSOFT CORPORATION  
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17 UNITED STATES DISTRICT COURT  
18 DISTRICT OF NEVADA  
19

20 MICROSOFT CORPORATION,  
21 Plaintiff,  
22 vs.

23 NASER AL MUTAIRI, an individual;  
MOHAMED BENABDELLAH, an individual;  
24 VITALWERKS INTERNET SOLUTIONS,  
LLC, d/b/a NO-IP.com; and DOES 1-500,  
25 Defendants.  
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) Case No. 2:14-cv-00987-GMN-GWF  
)  
) **MICROSOFT'S MOTION FOR DEFAULT**  
) **JUDGMENT**  
) **(Hearing Requested)**  
) Filed Concurrently Herewith:  
) Memorandum of Points & Authorities;  
) Declaration of Jason Lyons; Declaration of  
) Rachael M. Smith; [Proposed] Order

1 Pursuant to Fed. R. Civ. P. 55, Plaintiff Microsoft Corporation moves for an order of default  
2 judgment against Defendant Naser Al Mutairi and Defendant Mohamed Benabdellah (“Defendants”)  
3 on its claims brought under the Computer Fraud and Abuse Act and Nevada’s Unlawful Acts  
4 Regarding Computers and Information Services Statute.<sup>1</sup> Defendants have failed to respond or  
5 otherwise participate in this litigation. As a result, Microsoft obtained an entry of default against  
6 them and now seeks an order from this Court to permanently enjoin them from further spreading and  
7 infecting Microsoft’s customers with the Blandabindi/Jenxcus malware. Microsoft also seeks an  
8 award of damages in the amount of \$750,000 for costs related to its investigation and loss of  
9 goodwill as a result of the malware infections as set forth in the Declaration of Jason Lyons. These  
10 damages are recoverable under the Computer Fraud and Abuse Act, 18 U.S.C. § 1030(g) and  
11 Nevada’s Unlawful Acts Regarding Computers and Information Services Statute, N.R.S. §  
12 205.511(1)(a), (c). Last, Microsoft requests a hearing on this motion to give Defendants one more  
13 opportunity to appear and respond before a default judgment is entered against them.

14  
15 Dated: October 29, 2014

SHOOK, HARDY & BACON L.L.P.

16  
17 */s/ Randall D. Haimovici*  
RANDALL D. HAIMOVICI  
18 RACHAEL M. SMITH

19 Attorneys for Plaintiff Microsoft  
20 Corporation

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28 <sup>1</sup> Microsoft also asserted in the Complaint that Defendants violated the Anti-Cybersquatting  
Consumer Protection Act and were liable for common law trespass, conversion, and negligence.  
Microsoft is not seeking a default judgment as to these claims.