

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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MICROSOFT CORPORATION,	:	
	:	
Plaintiff,	:	Case No. 23 Civ. 10685 (PAE)
-against-	:	
	:	
DUONG DINH TU,	:	
LINH VAN NGUYEN, and	:	
TAI VAN NGUYEN,	:	
	:	
Defendants.	:	
-----X		

**MICROSOFT’S MOTION FOR DEFAULT JUDGMENT AND
PERMANENT INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 55(b)(2); the Lanham Act, 15 U.S.C. § 1114 *et seq.* and 15 U.S.C. § 1125; the Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. §§ 1962, 1964; the All Writs Act, 28 U.S.C. § 1651; and this Court’s inherent equitable authority, Plaintiff Microsoft Corporation (“Microsoft”) respectfully moves the Court for an entry of default judgment and permanent injunction against Defendants Duong Dinh Tu, Linh Van Nguyen (a/k/a Nguyen Van Linh), and Tai Van Nguyen (collectively, “Defendants”). As discussed in Microsoft’s Memorandum of Law in Support of this Motion for Default Judgment and Permanent Injunction, Microsoft requests an order entering default judgment against Defendants, who have failed to appear, answer, or otherwise respond to the Complaint after having been properly served. Microsoft further requests a permanent injunction preventing Defendants from continuing their harmful activities and permanently transferring to Microsoft ownership of the malicious domains identified in the Court’s preliminary injunction order and supplemental preliminary injunction order.

The requested relief is necessary to prevent Defendants from continuing their unlawful operations, which are causing irreparable injury to Microsoft, its customers, and the public. Microsoft respectfully requests that the Court grant this Motion.

Dated: August 27, 2024
New York, New York

CAHILL GORDON & REINDEL LLP

By: /s/ Brian T. Markley

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