

Accordingly, Plaintiff requests an order directing the RockCAPTCHA Website's (1) registry operator to change the registrar of record for the domain to Plaintiff's registrar of choice, which will then change the registrant of the domain to Plaintiff, and to take reasonable steps to work with Plaintiff to ensure the transfer of the domain; and (2) hosting service provider to disable all services provided thereto. It is imperative that this action be effectuated on an *ex parte* basis, shielded from anyone associated with the Fraudulent Enterprise, until it is complete. If Defendants are alerted to these efforts prior to completion, there is substantial risk they will relocate the infrastructure to an alternative domain or domains, thwarting this attempt to stop the Fraudulent Enterprise.

Microsoft respectfully requests that this Court grant its Motion.

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