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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

GREGORY D. EVANS, LIGATT
SECURITY INTERNATIONAL,
INC., and SPOOFEM.COM USA
INC.,

Plaintiffs,

vs.

JOHN DOES 1-8,

Defendants.

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CIVIL ACTION FILE

NO. ~~111~~ CV - 0458

FILED UNDER SEAL

PLAINTIFFS' MOTION FOR TEMPORARY
RESTRAINING ORDER AND PRELIMINARY INJUNCTION

Pursuant to Fed. R. Civ. P. 65(b), Plaintiffs Gregory D. Evans ("Mr. Evans") LIGATT Security International, Inc. ("LIGATT Security") and Spoofer.com USA Inc. ("Spoofer") (collectively "Plaintiffs"), by and through their undersigned counsel, hereby move this Court for a Temporary Restraining Order, Emergency Hearing, and Preliminary Injunction restraining and enjoining the activities of Defendants John Does 1-8 as requested herein.

Specifically, Plaintiffs respectfully request that this Court order the following :

1. That the following domain name registrars¹ being prevented from transferring the accounts associated with the following domain name registrations to another registrar and immediately take steps to preserve, maintain and keep from destruction any and all files, logs, sheets, records or any such other items of information that may reasonably identify or assist in identifying the account owner(s) of the domain name or the operator(s) of the website hosted using the domain name and provide such files, logs, sheets, records or other information to the undersigned counsel for Plaintiffs as quickly as reasonably possible:

<u>Domain Name</u>	<u>Registrar</u>
Ligattleaks.com	1&1 Internet, Inc. 701 Lee Road, Suite 300 ATTN: ligattleaks.com Chesterbrook, PA 19087
Ligattleaks.org	1&1 Internet, Inc. 701 Lee Road, Suite 300 ATTN: ligattleaks.org Chesterbrook, PA 19087
Ligattleaks.net	1&1 Internet, Inc. 701 Lee Road, Suite 300 ATTN: ligattleaks.net Chesterbrook, PA 19087
Pastebin.org	GoDaddy.Com, Inc. 14455 N Hayden Suite 226,

¹ See Declaration of Gregory D. Evans filed herewith at ¶50 and the exhibit referenced therein.

	Scottsdale, AZ 85260, US
TheTechHerald.com	Wild West Domains, Inc. 14455 North Hayden Rd Suite 219, Scottsdale, Arizona 85260
Attrition.org	Network Solutions LLC 13861 Sunrise Valley Drive Suite 300 Herndon, Virginia 20171

2. That Defendants immediately destroy, delete or dispossess, any file, document, information, material, or thing that was contained in the electronic file posted by John Doe 1 to www.pastebin.com on February 2, 2011 and, to the extent that they are still displayed, immediately remove any previous display, posting or communication containing such information, and that Defendants immediately discontinue all further transfer, transmission, display, review, possession, dissemination or use of such information.
3. That Defendants, upon 3 days of receiving this Court's order, certify to the court in writing, with a copy served on Plaintiffs' counsel of record, that it has complied with the foregoing provision and that it will continue to do so.

4. That following domain name registrars immediately “park” the following domain names until John Does 2 and 3 submit the foregoing certification to the court:

<u>Domain Name</u>	<u>Registrar</u>
Ligattleaks.com	1&1 Internet, Inc. 701 Lee Road, Suite 300 ATTN: ligattleaks.com Chesterbrook, PA 19087
Ligattleaks.org	1&1 Internet, Inc. 701 Lee Road, Suite 300 ATTN: ligattleaks.org Chesterbrook, PA 19087
Ligattleaks.net	1&1 Internet, Inc. 701 Lee Road, Suite 300 ATTN: ligattleaks.net Chesterbrook, PA 19087
Pastebin.org	GoDaddy.Com, Inc. 14455 N Hayden Suite 226, Scottsdale, AZ 85260, US

5. That the company that owns and operates the website located at www.twitter.com immediately put a technical hold on the Twitter accounts operating under the aliases/handles “ligattleaks” and “lucky225,” preventing the same from sending or receiving electronic communications via Twitter’s real-time information network or any

other communication network or tool offered by Twitter at

www.twitter.com.

6. That the company that owns and operates the website located at www.twitter.com immediately take steps to preserve, maintain and keep from destruction any and all files, logs, sheets, records or any such other items of information that may reasonably identify or assist in identifying the owner(s) or operator(s) of the Twitter accounts associated with the following aliases/handles Twitter accounts and provide such files, logs, sheets, records or other information to the undersigned counsel for Plaintiffs as quickly as reasonably possible:
"ligattleaks," "attritionorg" and "lucky225."

Emergency relief is justified and necessary in this case because of the immediate and irreparable injury, loss and damage Plaintiffs will suffer before a preliminary injunction may be scheduled on Plaintiffs' claims. This Motion is based upon the Complaint, the arguments and citations of authority contained in Plaintiffs' Memorandum of Law in Support of this Motion and the Declaration of LIGATT Securities' and Spoofer's Chief Executive Officer Gregory D. Evans (attached to the Memorandum as Exhibit "A"), all filed concurrently herewith.

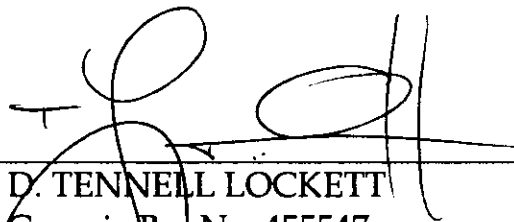
As explained in greater detail in the Brief accompanying this Motion, Defendants have stolen, acquired, possessed, used and/or displayed, and continue to possess, use and display, a substantial amount of Plaintiffs' private, personal, commercially sensitive, proprietary information and trade secrets without Plaintiff's authorization, and indeed, against Plaintiffs' will and demand. Specifically, a yet unidentified individual hacked into Plaintiffs' secured corporate network, gaining access to Plaintiffs' internal servers, databases, electronic mail archives and stealing over 80,000 electronic mail files and a yet undetermined amount of additional files, data and information. That individual also crashed Plaintiffs' commercial websites, hijacked Plaintiffs' corporate Twitter account, issued a manifesto describing his activities and made the Plaintiffs' private, proprietary and confidential information and trade secrets available to additional individuals using one or more computer networks. Defendants continue to possess, review, use and display such materials and information.

Defendants' conduct has and will continue to cause economic damage, monetary loss and other irreparable injury to Plaintiffs, and, if unchecked, may disparage the goodwill and business reputation that Plaintiffs have acquired through years of hard work. As a result of the foregoing, Plaintiffs are entitled to

a temporary restraining order and preliminary injunction because: (1) Plaintiffs are now suffering and will continue to suffer substantial irreparable harm as a result of Defendants' conduct; (2) Plaintiffs are likely to succeed on the merits of their claims; (3) the balance of hardships tips decidedly in Plaintiffs' favor; and (4) the public interest will be served by an injunction.

For the foregoing reasons and the reasons set forth in Plaintiffs' accompanying Memorandum of Law in Support of this Motion, Plaintiffs respectfully request that this Court enter a Temporary Restraining Order and thereafter a Preliminary Injunction in the form attached hereto as Exhibit "A."

Respectfully submitted this 15th day of February, 2011.



D. TENNELL LOCKETT
Georgia Bar No. 455547

TOWNSEND LOCKETT & MILFORT, LLC
1401 Peachtree Street
Atlanta, Georgia 30309
Telephone: (404) 870-8501
Fax: (404) 870-8502

Attorneys for Plaintiffs LIGATT Security
International, Inc. and Spoofem.com USA
Inc.

EXHIBIT A