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

FEB 15 2011

JAMES N. HATTEN, Clerk
By: *[Signature]* Deputy Clerk

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 NO.

111·CV-0458

FILED UNDER SEAL

PLAINTIFFS' MOTION TO FILE UNDER SEAL

Pursuant to Electronic Case Filing Standing Order No. 04-01, and other applicable law, Plaintiffs Gregory D. Evans (Mr. Evans), LIGATT Security International, Inc. ("LIGATT Security"), and Spoofer.com USA Inc. ("Spoofer") (collectively "Plaintiffs"), respectfully move this Court for an order granting it leave to file their Verified Complaint, Motions for Temporary, Preliminary and Permanent Injunction, and accompanying declarations and evidence under seal. In support of this Motion, Plaintiffs show the Court as follows:

1.

Plaintiffs are bringing this action against *John Doe* Defendants pursuant to the Computer Fraud and Abuse Act, 18 U.S.C. § 1030 *et. seq.*, the Georgia Computer Systems Protection Act, O.C.G.A. § 16-9-90, *et. seq.*, and other laws to recover legal and equitable relief for Defendants' unlawful conduct constituting, among other things, tortuous interference with contractual relations, business relations, and potential business relations, trespass to chattels and misappropriation of Plaintiff's trade secrets. Plaintiffs seek temporary, preliminary, and permanent injunctive relief, as well as compensatory damages, punitive damages, costs, and reasonable attorneys' fees and any and all appropriate additional relief.

2.

In addition to the Verified Complaint, Plaintiffs are filing a Motion for Temporary, Preliminary and Permanent Injunction, supporting declarations, and an accompanying Memorandum of Law.

3.

Evidence submitted by Plaintiffs show that Defendants have, among other things (more fully detailed in the Verified Complaint), accessed one or more computers on Plaintiffs' private business network by means of hacking, including Plaintiffs' internal Service Management Server and their web server. After

hacking into Plaintiffs' network, one or more of the Defendants downloaded, copied or otherwise acquired confidential, proprietary, and commercially sensitive from the Service Management Server, including at least passwords and pass codes to various virtual and physical company locations that housed additional confidential information. Defendants further downloaded, copied or otherwise acquired the company's web files stored on Plaintiffs' web server and subsequently deleted those files from their location on Plaintiffs' web server.

4.

Additional evidence has shown that, on or about February 2, 2011, one or more of the Defendants accessed Plaintiffs' email accounts by means of hacking, and downloaded, copied or otherwise acquired in excess of 80,000 company emails, attachments included, stored in my company email accounts. The emails contained in my accounts dated back at least 5 years and contained countless attachments and communications discussing and disclosing proprietary, confidential, commercially sensitive and private information.

5.

Plaintiffs respectfully seek leave to file this matter under seal because: (1) the Verified Complaint and Injunction papers include and attach highly sensitive and confidential information; and (2) this matter involves the disclosure of

confidential information over the Internet and the attending issues associated with the Internet's anonymity, including and especially, the Defendants ability to transfer their websites with other registrars and possibly registrars in a foreign country.

6.

The requests made herein are not being sought for any purpose contrary to the Federal Rules of Civil Procedure or the Local Rules of this Court.

WHEREFORE, for the foregoing reasons, Plaintiffs respectfully request that the Court grant them leave to file this matter under seal.

Respectfully submitted, this 15th of February, 2011.



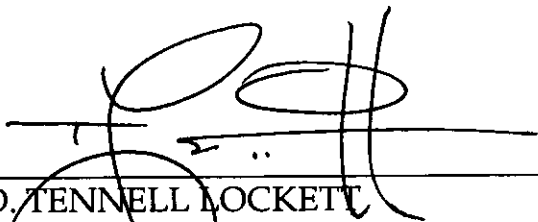
D. TENNELL LOCKETT
Georgia Bar No. 455547

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Attorneys for Plaintiffs

LR 7.1.D., NDGa CERTIFICATION

The undersigned counsel for Plaintiffs state and certify that the foregoing has been prepared with one of the font and point selections approved by the court in LR 5.1B.



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