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WESTERN DISTRICT OF WASHINGTON
DEPUTY



11-CV-00222-BOND

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MICROSOFT CORPORATION,

Plaintiff,

v.

JOHN DOES 1-11 CONTROLLING A
COMPUTER BOTNET THEREBY
INJURING MICROSOFT AND ITS
CUSTOMERS,

Defendants.

Case No.

C11-0222 *jr*

COMPLAINT

****FILED UNDER SEAL****

Plaintiff MICROSOFT CORP. ("Microsoft") hereby complains and alleges that JOHN DOES 1-11 ("Defendants") are controlling an illegal, notorious, and world-wide computer network known as the "Rustock botnet," made up of end-user computers connected to the Internet, which Defendants have infected with malicious software, and which Defendants consequently can and do direct and control for nefarious and illegal purposes through servers connected to the Internet.

NATURE OF ACTION

1. This is an action based upon: (1) the Computer Fraud and Abuse Act (18 U.S.C. § 1030), (2) CAN-SPAM Act (15 U.S.C. § 7704), (3) trademark infringement under the

COMPLAINT

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Seattle, Washington 98104-7097
tel+1-206-839-4300

Summons issued SEA039572

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1 Lanham Act (15 U.S.C. § 1114), (4) false designation of origin under the Lanham Act (15
2 U.S.C. § 1125(a)), (5) trademark dilution under the Lanham Act (15 U.S.C. 1125(c)), (6)
3 common law trespass to chattels, (7) common law conversion, and (8) unjust enrichment.
4 Microsoft seeks injunctive and other equitable relief and damages against Defendants for their
5 creation and ongoing use of the "Rustock" Botnet, which has caused and continues to cause
6 irreparable injury to Microsoft, its customers and the public.

7 **PARTIES**

8 2. Plaintiff Microsoft is a corporation duly organized and existing under the laws of
9 the State of Washington, having its headquarters and principal place of business in Redmond,
10 Washington.

11 3. The Defendants control server software operating from and through the
12 Command and Control IP Addresses/Domains set forth at Appendices A and B, which is used
13 to cause harm to Microsoft, its customers and the public.

14 4. Microsoft is unaware of the true names and capacities of the Defendants sued
15 herein as John Does 1-11, inclusive, and therefore sues these Defendants by such fictitious
16 names. Defendants own, operate and control the Rustock Botnet from and through the
17 Command and Control IP Addresses/Domains set forth at Appendices A and B.

18 5. Microsoft will amend this complaint to allege the Defendants' true names and
19 capacities when ascertained. Microsoft will exercise due diligence to determine Defendants'
20 true names, capacities and contact information, and to effect service upon those Defendants.

21 6. Microsoft is informed and believes and therefore alleges that each of the
22 fictitiously named Defendants is responsible in some manner for the occurrences herein alleged,
23 and that Microsoft's injuries as herein alleged were proximately caused by such Defendants.

24 7. The servers located at or hosting the Command and Control IP
25 Addresses/Domains are maintained by the companies set forth at Appendices A and B to this
26 Complaint.

27 8. The actions and omissions alleged herein to have been undertaken by the
28 Defendants were undertaken by each Defendant individually, were actions and omissions that

1 each Defendant authorized, controlled, directed, or had the ability to authorize, control or direct,
2 and/or were actions and omissions each Defendant assisted, participated in, or otherwise
3 encouraged, and are actions for which each Defendant is liable. Each Defendant aided and
4 abetted the actions of the Defendants set forth below, in that each Defendant had knowledge of
5 those actions and omissions, provided assistance and benefited from those actions and
6 omissions, in whole or in part. Each of the Defendants was the agent of each of the remaining
7 Defendants, and in doing the things hereinafter alleged, was acting within the course and scope
8 of such agency and with the permission and consent of other Defendants.

9 JURISDICTION AND VENUE

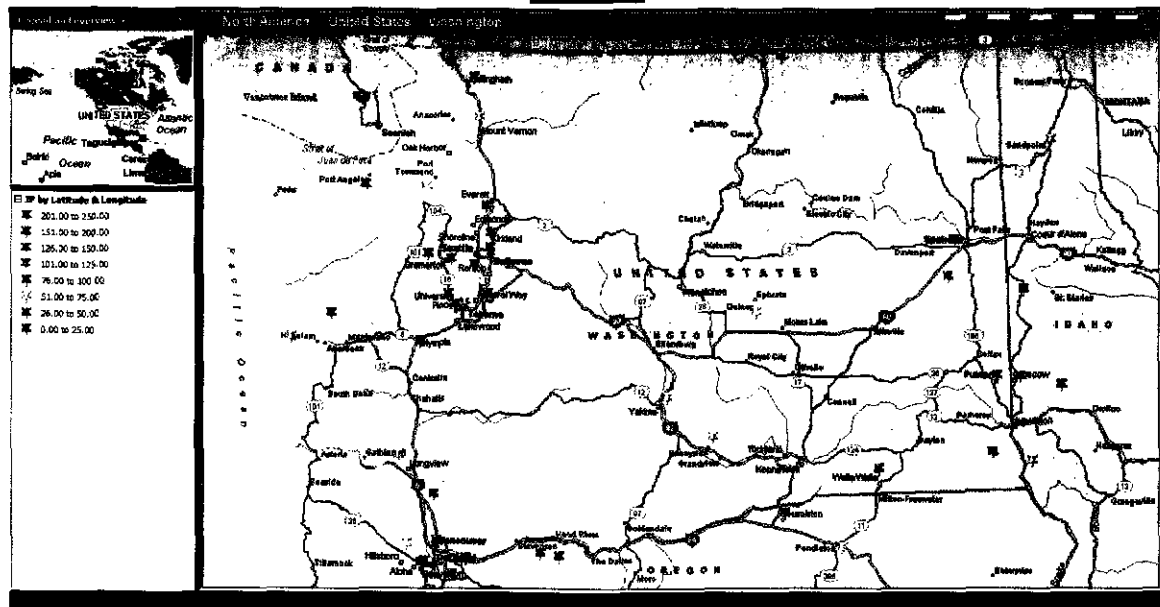
10 9. This action arises out of Defendants' violation of the Federal Computer Fraud
11 and Abuse Act (18 U.S.C. § 1030), CAN-SPAM Act (15 U.S.C. § 7704) and the Lanham Act
12 (15 U.S.C. §§ 1114, 1125(a), (c)). Therefore, the Court has subject matter jurisdiction over this
13 action based on 28 U.S.C. § 1331. This is also an action for trespass to chattels, unjust
14 enrichment and conversion. Accordingly, this Court has subject matter jurisdiction under 28
15 U.S.C. § 1367.

16 10. Defendants have directed acts complained of herein toward Washington, have
17 utilized instrumentalities located in Washington to carry out the acts alleged in this Complaint,
18 and engage in other conduct availing themselves of the privilege of conducting business in
19 Washington. In particular, Defendants have used server software operating from and through
20 the Command and Control IP Addresses/Domains to control a network of compromised user
21 computers, called a "botnet," which is used by Defendants to conduct illegal activities, thereby
22 causing harm to Microsoft as well as Microsoft's customers and other members of the public in
23 Washington.

24 11. Defendants have directed actions at Washington, including specifically the
25 Western District of Washington, by directing malicious computer code at the computers of
26 individual users located in Washington and the Western District of Washington specifically,
27 infecting those user computers with the malicious code and thereby making the user computers
28 part of the "botnet," which is used to injure Microsoft, its customers and the public. Figure 1

1 depicts the geographical location of user computers in Washington to which Defendants are
 2 known to have directed malicious code, causing them to become infected and part of the botnet:

3 **Figure 1**



13

14 12. Defendants have undertaken the foregoing acts with knowledge that such acts
 15 would cause harm through user computers located in Washington, thereby injuring Microsoft,
 16 its customers and others in Washington and elsewhere in the United States. Therefore, this
 17 Court has personal jurisdiction over Defendants.

18 13. Pursuant to 28 U.S.C. § 1391(b), venue is proper in this judicial district. A
 19 substantial part of the events or omissions giving rise to Microsoft's claims, together with a
 20 substantial part of the property that is the subject of Microsoft's claims, are situated in this
 21 judicial district. Venue is proper in this judicial district under 28 U.S.C. § 1391(c) because the
 22 Defendants are subject to personal jurisdiction in this judicial district.

23 **FACTUAL BACKGROUND**

24 **A. Rustock's Architecture Provides A Platform For World-Wide Illegal Activity**

25 **1. Overview of Rustock Architecture**

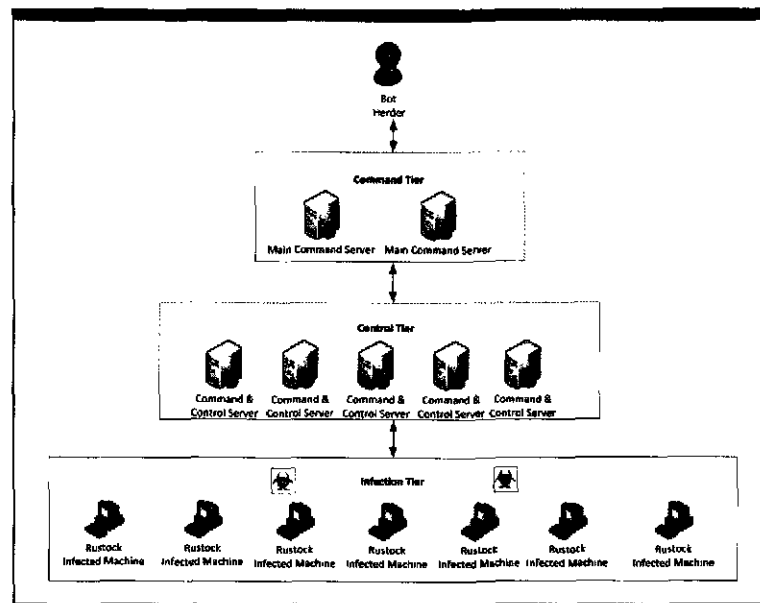
26 14. Botnets are networks made up of tens of thousands and sometimes, as is the case
 27 with Rustock, over one million infected end-user computers around the world. Malicious actors
 28 often use botnets because of their ability to support a wide range of illegal conduct, their resilience

1 against attempts to disable them, and their ability to conceal the identities of the malefactors
2 controlling them. They provide a very efficient general means of controlling huge numbers of
3 computers and targeting any action internally against the contents of those computers or externally
4 against any computer on the Internet.

5 15. Rustock is a “botnet” and is made up of end-user computers that have been
6 infected, via the Internet, with malicious software (“malware”) that places them under the control
7 of Defendants, who use the infected end-user computers for a variety of illegal activities. Rustock
8 significantly harms Microsoft, its customers, and the public, and if allowed to continue operating,
9 will only increase the damage it inflicts.

10 16. Rustock has a multi-tier architecture. The lowest tier, the “Infection Tier,” consists
11 of approximately one million Rustock-infected end-user computers. The Infection Tier performs
12 Rustock’s daily illegal activities, such as sending out enormous volumes of spam e-mail. The
13 middle tier in Rustock’s architecture, the “Control Tier,” consists of specialized Command and
14 Control Servers that relay commands and information to the Rustock-infected end-user computers
15 in the Infection Tier. On information and belief, the top tier in Rustock’s architecture, the
16 “Command Tier,” which is effectively obscured behind the Control Tier, is made up of the
17 computers that Defendants use to control and direct the Command and Control Servers. This
18 hierarchical architecture is depicted in Figure 2.

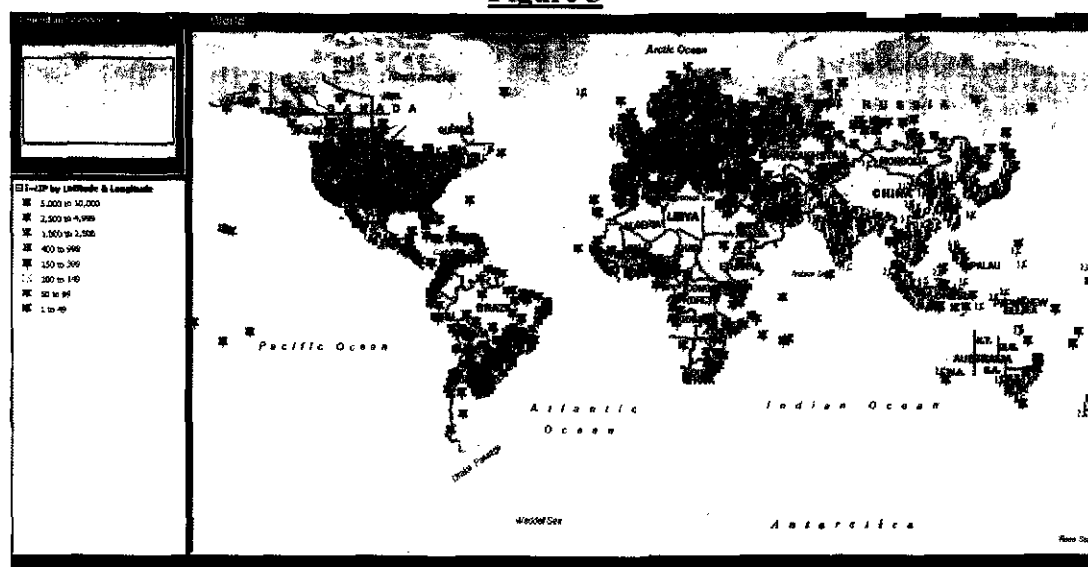
19 **Figure 2**



2. **The Infection Tier**

17. The Infection Tier in the Rostock architecture is made up of a large number of Rustock-infected end-user computers of the type commonly found in businesses, living rooms, schools, libraries, and Internet cafes around the world. For example, between January 22, 2011 and February 4, 2011, Microsoft detected that Rustock-infected end-user computers connected to the Internet from over 1,300,000 unique IP addresses around the world. The locations of these addresses world-wide are shown in Figure 3.

Figure 3



18. Analysis by Microsoft and independent researchers indicates that Rustock uses

1 several methods to infect end-user computers. One method involves using malware known as a
2 “Trojan downloader” that infects the end-user computer with Rustock malware, often along with
3 other types of malware that, upon information and belief, are used to steal the user’s confidential
4 information and/or enlist his or her computer in other illegal conduct. In general, Defendants are
5 constantly engaged in infecting additional end-user computers with Rustock malware. To counter
6 them, numerous software providers and software security firms are constantly engaged in trying to
7 disinfect those computers. However, this is a complex task: owners of infected computers would
8 need to undertake a specific investigation to even become aware of the infection, something many
9 consumers are unable to undertake independently.

10 19. Reliable analyses estimate that there are *upwards of one million* Rustock-infected
11 end-user computers in the world. Defendants direct these Rustock-infected end-user computers to
12 generate and send out a staggering volume of unsolicited bulk e-mail, commonly known as
13 “spam.” For example, in one 45 minute period on January 25, 2010, Microsoft’s investigative
14 team directly observed a single Rustock-infected end-user computer generate approximately 7,500
15 spam messages. At various times in 2010, Rustock was credited with generating between 20%
16 and 60% of all spam on the Internet. Recent data shows that Rustock’s capacity to send out
17 massive volumes of spam remains strong.

18 20. The vast majority of Rustock-generated spam e-mails promote counterfeit or
19 unapproved generic pharmaceuticals from unlicensed and unregulated on-line drug-sellers. A
20 large number of Rustock’ spam e-mails use the trademarks of a well-known pharmaceutical
21 manufacturer, Pfizer, Inc. to promote counterfeit pharmaceuticals. Still other Rustock spam e-
22 mail used *both* Pfizer’s and Microsoft’s trademarks to promote these pharmaceuticals. Other
23 Rustock spam samples used Microsoft’s “Microsoft,” “Hotmail,” and “Windows” trademarks (the
24 “Microsoft Marks”) to lure recipients into a confidence scam known as “advance fee fraud,” in
25 which spammers attempt to convince recipients that they’ve won a lottery and that they need to
26 send the spammers some amount of money to collect the larger lottery winnings. On information
27 and belief, most, if not all, owners of Rustock-infected end-user computers are unaware that their
28 computers are infected and operating as part of the Rustock botnet, or that their computers are

1 sending out spam messages.

2 3. **The Defendants Command The Rustock-Infected End-User Computers**
3 **Through the Control Tier**

4 21. The second level of the botnet, the Control Tier, is comprised of Command and
5 Control Servers¹ that, upon information and belief, Defendants have purchased or leased and
6 which they use to relay commands to control the Rustock-infected end-user computers of the
7 Infection Tier. There are presently approximately 96 Rustock Command and Control Servers
8 operating on the Internet. The number and locations of the Command and Control Servers may
9 change over time, and Microsoft and other security-researchers monitor Rustock to detect these
10 changes.

11 22. The Rustock Command and Control Servers send Rustock-infected end-user
12 computers information and instructions over the Internet that force the Rustock-infected end-user
13 computers to send out spam messages without the knowledge, approval, or involvement of the
14 end-users. On information and belief, the spam sent out by Rustock-infected end-user computers
15 is based on "spam-templates" or resource files that the end-user computers receive from the
16 Rustock Command and Control Servers.² On information and belief, spam templates or resource
17 files containing Microsoft trademarks are stored on the Rustock Command and Control Servers.
18 The Rustock-infected end-user computers use these templates and resource files to generate the
19 spam that they send out.

20 23. The Rustock Command and Control Servers listed in Appendix A are located at IP
21 addresses that are associated with computers physically located at data centers or web hosting
22 companies³ operated by third-parties in the United States. Defendants have either purchased or

23
24 ¹ The term "Command and Control Servers" refers either to physical server computers in the Command Tier
completely dedicated to supporting Rustock, or may be Rustock server software running on computers that might
also be running software that is not connected to Rustock.

25 ² The term "spam-template" refers to a file that contains what amounts to a pre-written spam message with certain
26 information such as the "To" address and the date represented by variables (essentially, placeholders) that can be
replaced with actual information before sending. The term "resource file" refers to a type of file commonly used in
software applications that stores strings of text, images, or other information in a way that can be accessed and used
27 by other software programs.

28 ³ The term "hosting company" refers to a type of company that specializes in offering computer hardware, software,
connection to the Internet, technical support, and other services to companies or individuals seeking to have a website
or some other presence on the Internet.

1 leased these computers, or purchased a subscription plan that allows them to run Rustock
2 command and control software on these computers.

3 **B. RUSTOCK DIRECTLY INJURES MICROSOFT'S CUSTOMERS**

4 **1. Overview of Harm To Microsoft And Its Customers**

5 24. Microsoft is a provider of the Windows operating system, Hotmail e-mail services
6 and a variety of other software and services. Microsoft has invested substantial resources in
7 developing high-quality products and services. Due to the high quality and effectiveness of
8 Microsoft's products and services and the expenditure of significant resources by Microsoft to
9 market those products and services, Microsoft has generated substantial goodwill with its
10 customers, has established a strong brand, has developed the Microsoft name and the names of its
11 products and services into strong and famous world-wide symbols that are well-recognized within
12 its channels of trade. Microsoft has registered trademarks representing the quality of its products
13 and services and its brand, including the Microsoft Marks.

14 25. The activities carried out by the Rustock botnet, described in detail above, and the
15 numerous resulting injuries to the public at large and Microsoft's customers, injure Microsoft and
16 its reputation, brand and goodwill because users subject to the negative effects of the Rustock
17 botnet may incorrectly believe that Microsoft is the source of computer problems caused by the
18 botnet. Microsoft is similarly injured because the botnet directs a large amount of spam e-mail to
19 users of Microsoft's e-mail services. Microsoft and its customers must bear this heavy burden and
20 customers may incorrectly believe that Microsoft is to blame for the spam e-mail.

21 **2. Rustock's Unauthorized Intrusion Into Microsoft's Customers'**
22 **Computers**

23 26. The most direct injury to Microsoft's customers is the installation of the Rustock
24 malware on their computers without their authorization or knowledge. Rustock malware is
25 specifically designed to infect and run on computers equipped with the Windows operating
26 system, which is licensed by Microsoft to end-users. End users' computers can become infected
27 with Rustock malware through a variety of mechanisms, some of the most common of which are
28 visiting an infected website where a Trojan downloader designed to download Rustock is staged,

1 or opening an infected attachment to an e-mail.

2 27. The installation of Rustock malware in and of itself damages the user's computer
3 and the Windows operating system on the user's computer. During the infection of an end-user's
4 computer, Rustock malware makes changes at the deepest and most sensitive levels of the
5 computer's operating system including the kernel, registry, and systems files. It installs its own
6 kernel mode-driver and intercepts and processes various Windows driver-requests. It alters the
7 behavior of various Windows operating system routines by manipulating various registry key
8 settings. It replaces Windows files with files of the same name that contain the Rustock malware.
9 It installs software that it needs to generate spam and to communicate with the Rustock Command
10 and Control Servers. Microsoft's customers whose computers are infected with Rustock malware
11 are damaged by these changes to Windows, which alter the normal and approved settings and
12 functions of the user's operating system, and destabilize it, and which result in the customers'
13 computers being forcibly drafted into the botnet.

14 28. Customers are usually unaware of the fact that their computers are infected and
15 have become part of the Rustock botnet. Even if aware of the infection, they lack the technical
16 resources or skills to solve the problem, allowing their computers to be misused indefinitely.
17 Even with professional assistance, cleaning a Rustock-infected end-user computer can be
18 exceedingly difficult, time-consuming, and frustrating.

19 **3. Microsoft Customers' Computers Are Used in Criminal Activity**

20 29. Once infected with Rustock malware, the end-user's computer is under the control
21 of the Rustock bot-herder and used by the Defendants for illegal activities. The primary function
22 of a Rustock-infected end-user computer is to send out a very large quantity of illegal spam e-mail
23 each day of its operation. Furthermore, the spam e-mails sent out by Rustock-infected end-user
24 computers illegally infringe the trademarks of Microsoft and other companies. Rustock spam
25 promotes pharmaceutical products that have been shown to be counterfeit, unlicensed, and
26 potentially dangerous to purchasers. Customers are harmed by having their computers impressed
27 into these illegal, harmful, and potentially criminal activities.

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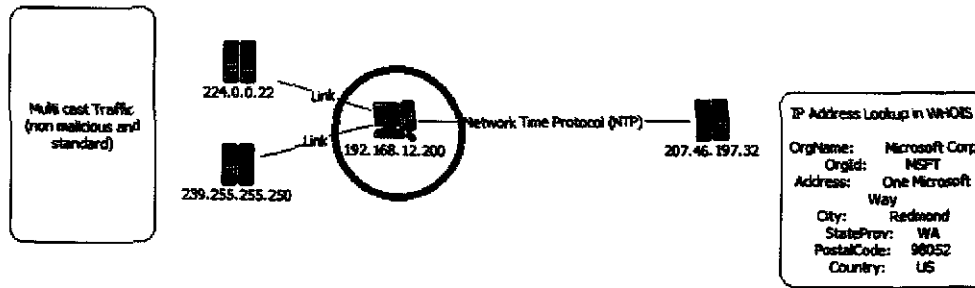
1 4. **Microsoft's Customers' Computer-Resources Are Utilized for Illicit**
2 **Purposes**

3 30. A Rustock-infected end-user computer's processing power, memory,
4 communications bandwidth, and other resources are used for the high volume of processing, data
5 transfer and connections to the Internet that the Rustock-infected end-user computer engages in.
6 For example, Figure 4 shows the tiny handful of Internet connections made by an uninfected
7 Windows computer (circled) over the course of almost six hours.

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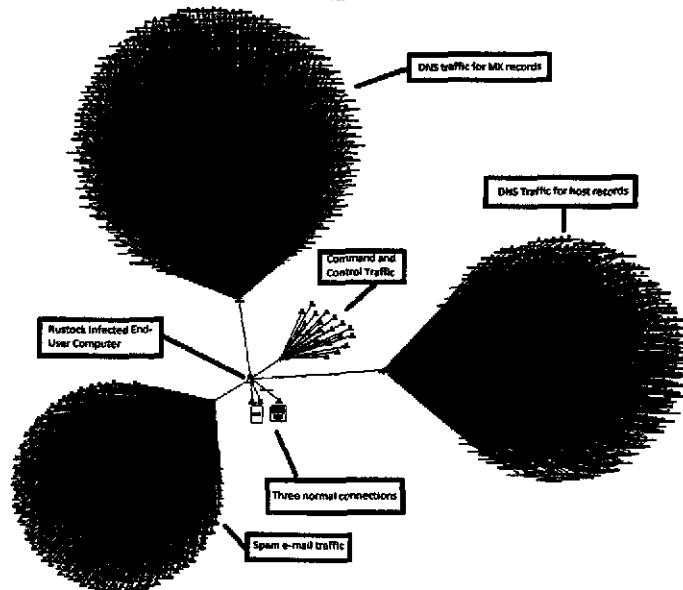
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Figure 4



31. In contrast, Figure 5 shows the enormous number of Internet connections made in a mere 24 minutes by a Rustock-infected end-user computer. The Rustock-infected end-user computer made the three normal connections of the baseline computer, but in addition, it performed 1406 unique lookups for various DNS "A" hosts on the Internet, 2238 unique lookups for DNS "MX" records for mail servers on the Internet, attempted to send spam e-mail to 1376 e-mail servers on the Internet, including to a number of Hotmail and MSN e-mail account customers; and in addition made 22 connections to Command and Control Servers or other servers on the Internet. The computing power and resources devoted to Rustock's nefarious activities are unavailable for the customer's legitimate uses.

Figure 5



1 **5. Microsoft Customers Are Directly Targeted by Rustock's Spam**
2 **Campaigns**

3 32. Microsoft customers are also targeted by Rustock spam campaigns. For example,
4 during the four-day period between October 26, 2010 and October 29, 2010, Rustock-infected
5 end-user computers sent approximately 34 million e-mails to roughly 50 million Hotmail
6 accounts, resulting in an average of approximately eight million spam e-mails per day, providing a
7 good approximation of the total amount of Rustock spam sent to Hotmail customer accounts on
8 any given day. Approximately 450,000 of these e-mails got through Microsoft's spam filters and
9 reached Microsoft's Hotmail customers. The very large amount of spam reaching Microsoft's
10 Hotmail customers frustrates them and diminishes their regard for Hotmail and Microsoft. Aside
11 from the harm done to Microsoft Hotmail account customers resulting from the sheer volume of
12 Rustock spam bombarding their Hotmail accounts, Rustock's spam attempts to lure them into
13 confidence schemes hatched by the spammers or other activities that will lead to further potential
14 injury, such as purchasing counterfeit or unapproved pharmaceuticals on the Internet.

15 33. Pharmaceutical counterfeiting, heavily promoted by Rustock, is, in essence, a
16 crime of fraud, trick, and deceit. Counterfeiters deceive patients into believing that the products
17 they offer are safe and effective medicines from trusted pharmaceutical companies such as Pfizer,
18 upon whose integrity they have relied to receive medicines that permit them to live happier and
19 healthier lives. In reality, however, counterfeit pharmaceutical products place human lives at
20 grave risk. And patients who order pharmaceuticals online in response to spam e-mail promotions
21 are particularly likely to place their health at risk.

22 **6. Microsoft Pays The Cost Of Protecting Hotmail Account Customers**
23 **From Rustock Spam**

24 34. Microsoft, as a provider of online e-mail services such as Hotmail, must maintain
25 spam filters to stop Rustock spam from reaching its customers. Rustock was acknowledged as the
26 largest known spam botnet in the world at its 2010 peak, with an estimated capacity to send over
27 40 billion spam e-mails per day, including to users of Microsoft's Hotmail e-mail service. Known
28 as the "King of Spam" in the Internet security community at that time, Rustock was estimated to
disseminate approximately 40 percent of the world's spam e-mail. While the volume of spam

1 attributed to Rustock fluctuates over time, recent data shows that Rustock is continuing in 2011 as
2 major contributor of spam on the Internet. Microsoft Hotmail systems are the target of a
3 substantial volume of Rustock spam. The sending of vast amounts of spam e-mail to Microsoft's
4 Hotmail e-mail services imposes a burden on Microsoft's Hotmail systems, and requires
5 Microsoft to expend substantial resources in an attempt to defend against and mitigate its effects.

6 7. **Microsoft Pays The High Cost of Assisting Customers Whose**
7 **Computers Are Infected By Rustock**

8 35. Additionally, Microsoft devotes significant computing and human resources to
9 combating Rustock infections and helping customers determine whether or not their computers are
10 infected, and if so, cleaning them. Customers' frustration with having to deal with Rustock
11 infections on their computers diminishes their regard for Windows and Microsoft, and tarnishes
12 Microsoft's reputation and goodwill.

13 **FIRST CLAIM FOR RELIEF**

14 **Violation of the Computer Fraud & Abuse Act, 18 U.S.C. § 1030**

15 36. Microsoft realleges and incorporates by reference the allegations contained in
16 paragraphs 1 through 35 above.

17 37. Defendants: (1) knowingly and intentionally accessed Microsoft customers'
18 protected computers and Microsoft's protected computers without authorization or in excess of
19 any authorization knowingly caused the transmission of a program, information, code and
20 commands, and as a result of such conduct intentionally caused damage without authorization
21 to the protected computers (18 U.S.C. § 1030(a)(5)(A)); and (2) intentionally accessed the
22 protected computers without authorization, and as a result of such conduct caused damage and
23 loss (18 U.S.C. § 1030(a)(5)(C)).

24 38. Defendants' conduct has caused a loss to Microsoft during a one-year period
25 aggregating at least \$5,000.

26 39. Microsoft has suffered damages resulting from Defendants' conduct.

27 40. Microsoft seeks compensatory and punitive damages under 18 U.S.C. § 1030(g)
28 in an amount to be proven at trial.

1 41. As a direct result of Defendants' actions, Microsoft has suffered and continues to
2 suffer irreparable harm for which Microsoft has no adequate remedy at law, and which will
3 continue unless Defendants' actions are enjoined.

4 **SECOND CLAIM FOR RELIEF**

5 **Violation of CAN-SPAM Act, 15 U.S.C. § 7704**

6 42. Microsoft realleges and incorporates by reference the allegations contained in
7 paragraphs 1 through 35 above.

8 43. Microsoft is a provider of Internet access service. Microsoft enables users to
9 access content, including proprietary content, electronic mail, and other Internet services.

10 44. Defendants initiated the transmission of unsolicited, bulk spam e-mail, which are
11 commercial electronic messages, via the Rustock botnet, through Microsoft customers'
12 computers and through Microsoft's computers, which are used in interstate and foreign
13 commerce and communication, to thousands or millions of computers, which are also used in
14 interstate and foreign commerce and communication and are "protected computers" as defined
15 by 18 U.S.C. § 1030(e)(2)(B).

16 45. By sending messages via the Rustock botnet, Defendants initiated the
17 transmission of commercial electronic mail messages, to protected computers that contained
18 materially false or misleading header information in violation of 15 U.S.C. § 7704(a)(1).

19 46. Defendants initiated the transmission of commercial electronic messages to
20 protected computers with actual or fairly implied knowledge that the subject headings of the
21 messages would likely materially mislead recipients regarding the contents or subject matter of
22 the message in violation of 15 U.S.C. § 7704(a)(2).

23 47. Defendants transmitted to protected computers commercial e-mail messages that
24 did not contain a functioning return electronic mail address or other Internet-based mechanism
25 that recipients could use to contact Defendants and indicate their desire to opt-out of future
26 messages from Defendants, in violation of 15 U.S.C. § 7704(a)(3).

27 48. Defendants initiated the transmission to protected computers of commercial
28 electronic messages that did not provide (a) clear and conspicuous identification that the

1 message was an advertisement or solicitation; (b) clear and conspicuous notice of the right to
2 decline to receive future message; or (c) a valid physical postal address of the sender, in
3 violation of 15 U.S.C. § 7704(a)(5).

4 49. Defendants' unsolicited, bulk e-mails were sent as part of a systematic pattern
5 and practice that did not conspicuously display a return electronic mail address by which the
6 recipients could submit to the true sender a reply requesting that no further commercial e-mails
7 be sent to the recipient.

8 50. As a direct result of Defendants' actions, Microsoft has suffered harm in an
9 amount to be determined at trial.

10 51. Microsoft is entitled to the greater of actual damages or statutory damages in
11 accordance with 15 U.S.C. § 7706(g)(1)(B).

12 52. On information and belief, Defendants' actions were willful and knowing,
13 entitling Microsoft to aggravated damages in accordance with 15 U.S.C. § 7706(g)(3)(C).

14 53. As a direct result of Defendants' actions, Microsoft has suffered and continues to
15 suffer irreparable harm for which Microsoft has no adequate remedy at law, and which will
16 continue unless Defendants' actions are enjoined.

17 **THIRD CLAIM FOR RELIEF**

18 **Trademark Infringement Under the Lanham Act – 15 U.S.C. § 1114 *et. seq.***

19 54. Microsoft realleges and incorporates by this reference each and every allegation
20 set forth in paragraphs 1 through 35 above.

21 55. Defendants have used the Microsoft Marks in interstate commerce.

22 56. The Rustock botnet uses counterfeit copies of the Microsoft Marks in spam e-
23 mail, including through the software operating from and through the Command and Control
24 Servers. By doing so, Defendants are likely to cause confusion, mistake, or deception as to the
25 origin, sponsorship, or approval of the spam e-mail and material promoted through the spam e-
26 mail.

27 57. By using the Microsoft Marks falsely in connection with spam e-mail,
28 Defendants are likely to cause confusion, mistake, or deception as to the origin, sponsorship, or

1 approval of the e-mail sent by the Rustock Botnet.

2 58. As a result of their wrongful conduct, Defendants are liable to Microsoft for
3 violation of this provision of the Lanham Act.

4 59. As a direct result of Defendants' actions, Microsoft has suffered and continues to
5 suffer irreparable harm for which Microsoft has no adequate remedy at law, and which will
6 continue unless Defendants' actions are enjoined.

7 60. Defendants' wrongful and unauthorized use of the Microsoft Marks to promote,
8 market, or sell products and services constitutes trademark infringement pursuant to 15 U.S.C. §
9 1114 *et seq.*

10 **FOURTH CLAIM FOR RELIEF**

11 **False Designation of Origin Under The Lanham Act – 15 U.S.C. § 1125(a)**

12 61. Microsoft realleges and incorporates by this reference each and every allegation
13 set forth in paragraphs 1 through 35 above.

14 62. The Microsoft Marks are distinctive marks that are associated with Microsoft
15 and exclusively identify Microsoft's business, products, and services.

16 63. The Rustock Botnet makes unauthorized use of the Microsoft Marks. By doing
17 so, Defendants are likely to cause confusion, mistake, or deception as to the origin, sponsorship,
18 or approval of the conduct, actions, products and services carried out by or promoted by
19 Defendants and the Rustock Botnet, including software operating from and through the
20 Command and Control Servers.

21 64. As a result of their wrongful conduct, Defendants are liable to Microsoft for
22 violation of this provision of the Lanham Act.

23 65. As a direct result of Defendants' actions, Microsoft has suffered and continues to
24 suffer irreparable harm for which Microsoft has no adequate remedy at law, and which will
25 continue unless Defendants' actions are enjoined.

26 **FIFTH CLAIM FOR RELIEF**

27 **Trademark Dilution Under The Lanham Act – 15 U.S.C. § 1125(c)**

28 66. Microsoft realleges and incorporates by this reference each and every allegation

1 set forth in paragraphs 1 through 35 above.

2 67. The Microsoft Marks are distinctive marks that are associated with Microsoft
3 and exclusively identify Microsoft's business, products, and services.

4 68. The Rustock Botnet makes unauthorized use of the Microsoft Marks. By doing
5 so, Defendants are likely to cause dilution by blurring and dilution by tarnishment of the
6 Microsoft Marks.

7 69. As a direct result of Defendants' actions, Microsoft has suffered and continues to
8 suffer irreparable harm for which Microsoft has no adequate remedy at law, and which will
9 continue unless Defendants' actions are enjoined.

10 **SIXTH CLAIM FOR RELIEF**

11 **Common Law Trespass to Chattels**

12 70. Microsoft realleges and incorporates by this reference each and every allegation
13 set forth in paragraphs 1 through 35 above.

14 71. Defendants' actions in operating the Rustock Botnet result in unauthorized
15 access to the computers of Microsoft and its customers and result in unsolicited, bulk electronic
16 mail being sent to, from or through the computers of Microsoft and its customers.

17 72. Defendants intentionally caused this conduct and this conduct was unauthorized.

18 73. Defendants' actions have caused injury to Microsoft and its customers and
19 imposed costs on Microsoft and its customers, including time, money and a burden on the
20 computers of Microsoft and its customers, as well as injury to Microsoft's business goodwill
21 and diminished the value of Microsoft's possessory interest in its computers and software.

22 74. As a result of Defendants' unauthorized and intentional conduct, Microsoft has
23 been damaged in an amount to be proven at trial.

24 75. As a direct result of Defendants' actions, Microsoft has suffered and continues to
25 suffer irreparable harm for which Microsoft has no adequate remedy at law, and which will
26 continue unless Defendants' actions are enjoined.

SEVENTH CLAIM FOR RELIEF

Conversion

76. Microsoft realleges and incorporates by this reference each and every allegation set forth in paragraphs 1 through 35 above.

77. Defendants have willfully interfered with and converted Microsoft's personal property, without lawful justification, as a result of which Microsoft has been deprived of possession and use of its property.

78. As a result of Defendants' actions, Microsoft has been damaged in an amount to be proven at trial.

79. As a direct result of Defendants' actions, Microsoft has suffered and continues to suffer irreparable harm for which Microsoft has no adequate remedy at law, and which will continue unless Defendants' actions are enjoined.

EIGHTH CLAIM FOR RELIEF

Unjust Enrichment

80. Microsoft realleges and incorporates by this reference each and every allegation set forth in paragraphs 1 through 35 above.

81. The acts of Defendants complained of herein constitute unjust enrichment of the Defendants at Microsoft's expense in violation of the common law.

82. Defendants accessed, without authorization, computers running Microsoft's software or computers which otherwise belong to Microsoft.

83. Defendants used, without authorization or license, the facilities of Microsoft's software and computers which belong to Microsoft to, among other acts, deliver malicious software, support the Rustock Botnet, infringe Microsoft's trademarks, deliver unsolicited, bulk e-mail and deceive users.

84. Defendants' actions in operating the Rustock Botnet result in unauthorized access to the computers of Microsoft and its customers and result in unsolicited, bulk electronic mail being sent to, from or through the computers of Microsoft and its customers.

1 85. Defendants profited unjustly from their unauthorized and unlicensed use of
2 Microsoft's software and the computers of Microsoft and its customers.

3 86. Defendants had an appreciation and knowledge of the benefit they derived from
4 their unauthorized and unlicensed use of Microsoft's software and the computers of Microsoft
5 and its customers.

6 87. Retention by the Defendants of the profits they derived from their unauthorized
7 and unlicensed use of Microsoft's software and the computers of Microsoft and its customers
8 would be inequitable.

9 88. Defendants' unauthorized and unlicensed use of Microsoft's software and use of
10 the computers of Microsoft and its customers have damaged Microsoft in an amount to be
11 proven at trial, and Defendants should disgorge their ill-gotten profits.

12 89. As a direct result of Defendants' actions, Microsoft has suffered and continues to
13 suffer irreparable harm for which Microsoft has no adequate remedy at law, and which will
14 continue unless Defendants' actions are enjoined.

15 **PRAYER FOR RELIEF**

16 WHEREFORE, Plaintiff Microsoft prays that the Court:

- 17 1. Enter judgment in favor of Microsoft and against the Defendants.
- 18 2. Declare that Defendants conduct has been willful and that Defendants have acted
19 with fraud, malice and oppression.
- 20 3. Enter a preliminary and permanent injunction enjoining Defendants and their
21 officers, directors, principals, agents, servants, employees, successors, and assigns, and all
22 persons and entities in active concert or participation with them, from engaging in any of the
23 activity complained of herein or from causing any of the injury complained of herein and from
24 assisting, aiding or abetting any other person or business entity in engaging in or performing
25 any of the activity complained of herein or from causing any of the injury complained of herein.
- 26 4. Enter a preliminary and permanent injunction isolating and securing the botnet
27 infrastructure, including the software operating from and through the Command and Control IP
28 Addresses/Domains and placing that infrastructure outside of the control of Defendants or their

1 representatives or agents.

2 5. Enter judgment awarding Microsoft actual damages from Defendants adequate to
3 compensate Microsoft for Defendants' activity complained of herein and for any injury
4 complained of herein, including but not limited to interest and costs, in an amount to be proven
5 at trial.

6 6. Enter judgment disgorging Defendants' profits.


7 7. Enter judgment awarding enhanced, exemplary and special damages, in an
8 amount to be proved at trial.

9 8. Enter judgment awarding attorneys' fees and costs, and

10 9. Order such other relief that the Court deems just and reasonable.

11
12 Dated: February 8, 2011.

ORRICK, HERRINGTON & SUTCLIFFE LLP

13
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Telephone: +1-650-614-7400
Facsimile: +1-650-614-7401

Attorneys for Plaintiff Microsoft Corp.

DEMAND FOR JURY TRIAL

Microsoft respectfully requests a trial by jury on all issues so triable in accordance with Fed. R. Civ. P. 38.

Dated: February 8, 2011.

ORRICK, HERRINGTON & SUTCLIFFE LLP

By:



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Attorneys for Plaintiff Microsoft Corp.

Appendix A

IP Addresses Of Command And Control Servers	Location Of The Data Centers, Hosting Companies Where Defendants Have Placed The Command And Control Servers
204.45.118.202 204.45.118.250 204.45.119.2 204.45.119.10 204.45.119.18 204.45.119.26 204.45.119.34 204.45.119.42 204.45.119.50 204.45.119.74 204.45.119.82 204.45.119.90 204.45.121.18 204.45.121.34 204.45.121.42 204.45.121.50 204.45.121.58 204.45.121.130	FDCservers.net, LLC 141 W. Jackson Blvd., Suite 1135 Chicago, IL 60604 And/or 1500 Champa St. Denver, CO 80202 And/or 15204 Kishwaukee Valley Rd. Woodstock, IL 60098
69.197.144.138 69.197.158.250 69.197.161.34 173.208.143.194 173.208.154.90 204.12.192.250 204.12.217.42 204.12.217.250 204.12.237.202 204.12.243.34 204.12.243.42 204.12.243.58 204.12.248.66 208.110.82.186 204.12.217.218 69.197.158.242 173.208.131.178 173.208.141.154 173.208.143.90 173.208.163.242 173.208.163.178 204.12.217.218 204.12.217.98 173.208.128.50 173.208.143.114	Wholesale Internet Datacenter LLC Wholesale Internet, Inc. 324 E. 11th St. Suite 1000 Kansas City, MO 64106 And/or 1102 Grand Blvd, Suite 905 Kansas City, MO 64106

204.12.220.122 208.110.71.58	
64.120.144.69 64.120.149.117 64.120.153.117 64.191.38.165 64.191.53.37 64.191.59.245 66.96.224.213 66.197.161.181 66.197.251.69 96.9.180.21 96.9.182.101 96.9.182.197 96.9.183.149 66.96.214.53 173.212.243.114 64.191.18.149 173.212.214.194 173.212.241.42 173.212.241.50	BurstNET Technologies, Inc. d/b/a Network Operations Center, Inc. 420-422 Prescott Ave Scranton, PA 18510
96.0.203.82 96.0.203.90 96.0.203.98 96.0.203.106 96.0.203.114 96.0.203.122 173.83.26.26 173.83.26.34 96.9.169.53	Ecommerce, Inc. 1774 Dividend Dr Columbus, OH 43228
74.86.210.134 208.43.17.44 208.43.18.12 208.43.40.148 208.101.27.108 208.101.27.72 74.86.210.133 173.192.135.98 173.192.135.99 208.43.157.96 173.192.135.102 67.228.206.92 174.36.237.84 208.43.102.220	Softlayer Technologies c/o Infomart Data Center Facility 1950 North Stemmons Freeway Dallas, TX 75207-3118 and 4030 Lafayette Center Dr. Chantilly, VA 20151 and

	c/o Sabey carrier hotel 3355 S. 120th Place Tukwila, WA 98168
98.126.42.26	VPLS Inc. d/b/a Krypt Technologies 1400 South Grand Ave Santa Ana, CA 92705 And/or One Wilshire 624 South Grand Ave Los Angeles, CA 90017 And/or 600 West 7th Street, Suite 530 Los Angeles, CA 90017 And/or 800 South Hope Los Angeles, CA 90017
66.79.162.86 66.79.163.102 66.79.162.138	DCS Pacific Star, LLC 5050 El Camino Real, Suite 238 and/or 268 Los Altos, CA 94022
69.50.197.191	Atjeu Publishing LLC / Atjeu Hosting LLC 1515 West Deer Valley Road Bldg C-103 Phoenix, AZ 85027
98.141.220.194 98.141.220.226 76.161.33.58	Reliable Hosting Services, LLP 11513-19 Sunset Hills Road Reston, VA 20190
96.31.81.44	Noc4Hosts Inc. 4465 W. Gandy Blvd Suite 812 Tampa FL 33611

Appendix B

Domains and Registries

- **Registries:**

Verisign Naming Services
21345 Ridgeway Circle
4th Floor
Dulles, VA 20166

Afilias USA, Inc.
Building 3, Suite 105
300 Welsh Road
Horsham, PA 19044

- **Domains:**

gbsup.com
djl004daiywyed62wd.me
osg00aqslnpspyo.info
pan00c4sshlwgi.info
ovn00elprb15b6bodr.name
db600rgsajryc.com
pre015koynvhkiqja1.name
pf703fuipluauo.com
rj7069ht31wdyxettj.info
cme070vafafcsr.info
lpj07fyuft62nrlh.name
fqw07sow85ofbe0.com
aws07tb6sl38vv.me
bap07yd2syajfp.name
ldv07yiqrplsju.com
oe0a2atcb31tsrp07n.net
qq70aixymnkxwclq.info
voe0amt62theg.net
afe0avd85efvdjy.name
ri00b6e0rehe7762p70xr.net
ts70brfttisf.name
bv00cfxmgpir4dij.me
irn0e5btrnv70oo.com
he00e7sk62ycdhexbu.net
i850eaqdpocbj77afc.net
rff0edbdyjbeyl.name
xwb0eikesriess54.name
pwr0enkgc4ub54sn.net
70c0epgigtgyv00xi.me
31v0epoqqwadnea1.com

07fhvk3feedeedwjr.me
lgrmhw46cbtfi46fuo.net
93mhx1cvtbatljb.name
thuhxspadoa1.info
r93hxwopfotn.me
kdbhyqfyuwquf.info
bsqi15fd2tihom69kt.net
qgni31wl77xwynoys.net
axoi69jfoygsob8c.info
gvai69wwujsdobn.name
5bei70leuqchbm.name
edaiacf46ibua.com
yhtiafiaytxybgm.net
hkriahfrt31vba.name
85sialfsscbdkrm.info
dkxibhuabm0eho.me
elkicmthxpmwcf.me
dvbid2o77wglhv.net
tsmidhbykgk231cu.name
djiydw31jhukcbs.me
rhcidye0c4drq.com
uljiebve4dcmyb.name
j23ieiacala862h.info
h8ciej4693cmhuqff5.name
iniieldgteui.info
clffiduanticjho.com
vgiifnd1cseedqrx.me
85bifoekdyjy.com
rxgifurhf69sihy07.name
vicigfvwxyq.info

mtibygfof5do.info
fcibyx3fkor62rvm.info
fmfc1cvmiqaa93gb.name
olnc41cjbkndoyu69k.info
ienc4abwr3fpc.name
kelc4dupiijc.name
4dnc4fdqnyxjfkmb.name
rbbc4jkvsfgo.net
wkpc4lrleomnil.info
v9ac4mkttxufic4.name
lvcc4xuuskxrhgc.name
ihac4yrhcygb6xgr.name
vsfc54dfubmfcbo.net
ssxc54rw3f38lohf70.info
yqdc62mkyww4dke.info
2avc69oxr54kew15mt.net
ykbc85rpntilic7.me
00kc8cjqbfcsd24dg.me
ckmca1scbf31c.name
wk8cabpuoxcwem.com
fx8cacacuaipajj.net
lb6cafwwsyeb6gbp.com
jqcatejfwrq.me
hwtcawn15mksmjo.info
hnmcaxosesqgogg.me
oescb31ot46oer.me
5bocb646xyhql.info
85xcb7ekttb691cx.net
2axcb93aminifnaf.me
3frcbafwb6dctvqgv.com

xim0eqvksjmp.net
 bti0ermli07gb6mc4c.net
 tgs0esgnaelnjm38.info
 et70fhpbittb.net
 hj00fwppqblxgepn.name
 rs00gfk8cejau.info
 jpe0gm9ai00ifwdgsp.net
 uoe0iojpfbvquqfbd.com
 lj70klepssba.name
 ri00kqte7ymldv4dd.com
 jk70lifnetb1cd9h.com
 lxe0lleeyd9bmjogt.info
 twe0lplhbtsh.com
 kre0nlxsnfca8kxmbi.net
 nve0rspgf5buvur38t.name
 dc00tvorlseveq.me
 e000wb6bcinetp5b.com
 bme0wkcb93padne7cs.com
 cde0ype7ve7hl15fug.info
 uc31318cwvojm.name
 nek1515wi31uqbbxkv.com
 lji152aqrfixro.name
 mtm1562dqwgfwyc.info
 tpm15d3ftvnxipray.me
 3fe15e7gwv85yagk.info
 y7015ifdynrdys.info
 cbp15oshnpw62m.com
 fcq15rxcyuo15u.com
 thd15wvnh5bi8c.net
 pfc15x00gxruigm.info
 dwa15xxmkykkpfaa.me
 xt319acc770erpwmbe.me
 2aa1a1fafmlxbhbgc.name
 wfl1cdicvmswbbb.net
 cb61cgpdhw1cjtj.info
 uim1cgqohsd9lwlap.name
 pfa1d9mqnvoqj.com
 aya1hdxcld00ax.me
 tb31jqigvy5bo.name
 tt31mynwlvkwlwgn.net
 eb31ppvwqwoa8af.info
 gma1qceordc15.me
 tva1re85jfa138shgb.com
 kd31sh8c7eljd9cbmwa.me
 rc31umxssden.net
 pr31x9a0ejxyybj.com
 vd31xl544dfddnfm.me
 ioa1xorbtfiqrb.name
 cop23acbw69iib.net
 ibi23bhsseepqi.me

69oigxk85ruyqynq.info
 liyihejbmsbm70.com
 utxihynedjmlx0e.info
 e70ihypdjhb6jy.name
 afgii62uvahi.info
 15dlic4ufee700j.me
 mxbiilxisdfjc62s.com
 nuxikfcu5b9aerya1.me
 ra8ikt70ajslesi.info
 xnmim85iesswp.info
 oynimtgowltwvyj.me
 aqringxiskte23.me
 l93ioo23mahd2afqot.com
 fd9ioxknxxtypih.name
 wbdipafhxddmdd2.me
 3feipemhpovjghv.com
 yofiqlmud07i.com
 dvwimc4vfcsshc.name
 d2eisgxqp1cfc.info
 ebtisicwjbcb.name
 qwhitekamwkky.net
 dhniitfxpdnf69acb.com
 rehitynrea8pvsom0e.info
 e7liu461cotctn69.com
 gtniufnkkprqn.me
 saoiuio7esujc.info
 pxyluljnc070eou.name
 l85iuvejfeagan93a.me
 irsiv70bf4dlh.info
 cqsikwkokuerivp.net
 euwixdkcb31ut.info
 abpxe2aaa1ccih.com
 vktixfrwwpbh.com
 mcdixokemmjl15.info
 m2aixglewyif5.info
 cjdiy5wnerq.info
 lknuyue15cwj.net
 yqvyyuihctn.net
 kkjj00yeckvcgses.net
 rkyj6907j3800d2rma.com
 qulj69rlrljbxjib.me
 a1cja0elcwrpgsvx.name
 v38jafaqbgrrt5b.me
 jgajafdkwplqc.net
 70tjamx5bsuvrb31m.name
 qppjanb6dijpscrd2e.info
 nvijb6umatfimsj.name
 uh3jcbdhedunt.com
 ljjcpaplc4p.info
 nxijdotv4dhp.name

cjgcbdbafejgahidx.com
 uaqcbbhxxrypo.name
 t15cbdcbouhfjxxdv.info
 cqocbdtdwd2wi3f3f.info
 sedcbduxquqiqdh.com
 jclcbepond2f.info
 mn8cbfbda1f5omwiv.com
 pxdcbhnpuugre.name
 dmccbmvs85sjxov.com
 jlhcbbpqqejevfvq.me
 egmcbpupdebdgi.net
 xawcbqa1ffpykv.name
 f5fcbqm8cejmen.info
 iwvcbrmnf31algcc.net
 fitcbrpp62xpkub.net
 p5bcbtprmbikhvfc4.me
 m9acc46mr15lggeebm.me
 i7ecclerxwnd.net
 df5ccnq77xsoq.me
 23cccqmqmi62qa.net
 x9accwwnpwqwuhyi.net
 ec8cd2kriqfpc07th.name
 mafcd946f70fe7a1u.info
 vn1cdxckl85ry.net
 kefceeasagf58csb.net
 ssucegsfm1cj.com
 csncejnhpvtat.me
 0efcetqfcvowb.name
 0eicfdoa8veoe.me
 vi1cfid9aknqn2aa07.info
 dlvcg93gpiio8c62.name
 snxcgmoqwbcici.info
 pnech8507kqlalw.com
 b6dchspuf77bnbbde.info
 xnjcbxhxeesdn.com
 qe7cietqjha1mtx.me
 mbociosskowfc.net
 awbcivbncyqs.me
 prvcj15ux1ckxmuf.info
 0eecjavbrkynx9aw.info
 bj1cjwb6vjlt93j.name
 deucke7urpckf62ik.me
 qldckerjaa1area1d.net
 b7eckmvsd9djot.info
 cbqcknde7bdudl3fkfx.com
 23qclkhocyg8cxas.me
 dfgclma93rvcbdxi.name
 f5aclxwmd9dtn.name
 h15cmbdclowf.net
 ibbcmcbbukseesb.com

kdt23gremasxlt.net
 ria23lbsn23tcbg00dn.info
 tai23nb6rv15kd.me
 sff23o54xgle7kp.me
 weu23p00wco00ftrt.com
 xmf23poeewdf5bru.info
 aym23uubhc4kd.me
 bdd293iongsrcn38ot.me
 jd62a23a1vllsfwdfc.net
 ngb2a23uokcgra.me
 lqp2aicjpnqjbdn.info
 31o2akkknrtwjta0e.name
 qbd2aqefaluut.me
 dqd2aute7eud9i85.me
 saf2avc7eqwhm00q.me
 yhd2be7uvsfon.me
 dx62gucdurjm85.net
 us62ialpkkijkivp.net
 rc62l07cbfn703fwojux.com
 sbd2mcjchjooqxxi.me
 vi62pe7pa70dbe0pmn.com
 xf62svlf31vfcwi3f.me
 iad2und9c4slv77eymf.net
 imd2uoxp6954vw.net
 su62vdxcr62hny.info
 cb62xbfpuixpde7eb.info
 lf62xyh9aveaplxqc.info
 l5b3123ojbmbobsa8ytw.info
 hqi3146mrv31gley.net
 69p31envphnm.me
 jfg31gwasnbwkr.com
 aab31mha5bwtgdgeil.com
 wmi31tfmbnhf1c.net
 gp2331svxj69xj0e.net
 wb63831qaa1a1eokm.com
 jkp38cc859aed15vp.name
 uae38gme7eirhcb07x.net
 1cc38hmvsxf5imp.net
 e0i38lehcgofwt.info
 bbd38n69crspcw.net
 fcc38nscrswkxg.net
 lvb38pre7bfxnlu.me
 ecn38rjma8nc4c7evmo.name
 ic93cdfxkddeqmx.com
 lq93cw7emnjfdt.net
 jn93edbixusbcpq.net
 aw93eoq38x1chnijsb.info
 raf3f70bqpv70cmd8c.name
 bm23fafyjkpufysh.com
 fw93fchcicu9aoj.me

n8cjdqhlcpfcu.info
 kdajeedddoxph.name
 xejjelwgc4a1dr93cq.com
 i0ejenid2meyunc4fj.me
 ulyjebxmtfwye7.name
 tiejf54wjx7ewg.name
 dfjfxxybbe7f9a.com
 k62jg3815xttdxki62.name
 e93jgefycja1ae23.name
 kipjgitscqwbcqp.info
 bkijgpuqk0b6ggu.me
 khpjgujie0fvjak.com
 ca1jgxvqkahrwt.name
 lotjhcw15dyfa8c.net
 pjkhntse7cvnsm31.com
 jaojkgf5hcor.net
 vawjk8ccbogfccpn.name
 huqjkagf431e7.info
 mvejkuwgtyqd54s.net
 rwkjl07qdybe7od9hh.me
 hpkjicedjbdq.net
 mrljmdgdagry.info
 lmijmissbx70kiq.net
 jedjn31bgqmxuaj77.name
 qyajn70ljkv5bibddb.me
 brojodmncnoj.name
 upyjofwf5wcdl.net
 07ojonrfdwrwx54t.info
 agtjorbdk77dak.me
 kcgjp9axa8ooy.me
 c1cjp0ecf569ibdjc.net
 fvjprtqrlrgadh.net
 vrejpsgtpcavv.name
 yujjptaa8yntj.name
 gdkjptvxyiqyci38.com
 fkmjpwud9lgcb.name
 emnjrknbrore0.me
 eejrsq2a07vbp.net
 ykpjta1hb6sckos.com
 fbcjtcjaobkicn.net
 r2ajtepqe0ddd9c.com
 evmjtmfamkbku.com
 85fju46b2aeeohtu0e.com
 poujuh70ophrbr.net
 obrjujvwqppof.net
 qwdjvnc4ecgs.name
 bdtjw31p8cb6axgl77.info
 xkbjwpycponuox.me
 fekjwomhtqyss.me
 lwwjxcydnatl.me

qvqcmibyac4teee.me
 gl1cmoan4dxbaefp93.info
 nfcmmurubqxq.com
 jqmcbuidrv.info
 jrgcopjummqd9.info
 gjccoqdehwdpxf.me
 dcfcorns93k8cid2dq.name
 vl1coxx38psbf.com
 ehscoyeyfebs8c.info
 bqfcpdjqrbruyrxro.name
 wpicpero85aes.name
 etjcpgtlxkxfctkn.net
 vmgcptubdtwy.me
 v70crggjpmmk77u69.net
 pg1cs38fjgnd9gd2uj.net
 ekicsysdnirtfp.com
 em1ctxc4cjohkqj.name
 vcdctyccsesy.name
 e7ocucfmlkv.info
 oe1cucqycxkw.me
 gfkcul93w4deeatmr.info
 pj1cv54vumdss.com
 lt1cvepbvcer.info
 opncvgyfvjseim.net
 erkcvcjk1cpjhlvla8.name
 bxwcvocqi31r.me
 54ucvrxigqqomr.net
 gh1cvue23esxi.info
 vycgwabrmhb6vcnrm.me
 psscwcercxbd4dmq.net
 ysdcwvxle77lb.me
 38pcxnjtcbcbjoe.info
 ypocxunih1cu.net
 fhdcxyfxxggf46b.info
 pgwcy4dnkmbe.net
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Appendix C

Int. Cls.: 9 and 42

Prior U.S. Cls.: 26, 38 and 101

United States Patent and Trademark Office

Reg. No. 1,200,236

Registered Jul. 6, 1982

**TRADEMARK
SERVICE MARK
Principal Register**

MICROSOFT

Microsoft (partnership)
Suite 819
10800 NE. 8th
Bellevue, Wash. 98004

For: **COMPUTER PROGRAMS**, in **CLASS 9**
(U.S. Cls. 26 and 38).

First use Nov. 12, 1975; in commerce Nov. 12,
1975.

For: **COMPUTER PROGRAMMING SER-**

VICES, in **CLASS 42** (U.S. Cl. 101).

First use Nov. 12, 1975; in commerce Nov. 12,
1975.

Ser. No. 236,080, filed Oct. 22, 1979.

B. H. VERTIZ, Primary Examiner

CHERYL LYNNE HENDERSON, Examiner

Int. Cls.: 9 and 42

Prior U.S. Cls.: 26, 38 and 101

United States Patent and Trademark Office

Reg. No. 1,200,236

Registered Jul. 6, 1982

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First use Nov. 12, 1975; in commerce Nov. 12,
1975.

Ser. No. 236,080, filed Oct. 22, 1979.

B. H. VERTIZ, Primary Examiner

CHERYL LYNNE HENDERSON, Examiner

Int. Cls.: 35 and 38

Prior U.S. Cls.: 100, 101, 102 and 104

Reg. No. 2,165,601

United States Patent and Trademark Office

Registered June 16, 1998

**SERVICE MARK
PRINCIPAL REGISTER**

HOTMAIL

**HOTMAIL CORPORATION (CALIFORNIA
CORPORATION)
1290 OAKMEAD PARKWAY, SUITE 218
SUNNYVALE, CA 94086**

**FOR: ADVERTISING AND MARKETING
SERVICES, NAMELY, PROMOTING THE
GOODS AND SERVICES OF OTHERS BY
PLACING ADVERTISEMENTS AND PROMO-
TIONAL DISPLAYS IN AN ELECTRONIC SITE
ACCESSED THROUGH COMPUTER NET-
WORKS AND BY DELIVERING ADVERTISE-
MENTS AND PROMOTIONAL MATERIALS TO**

**OTHERS VIA ELECTRONIC MAIL, IN CLASS
35 (U.S. CLS. 100, 101 AND 102).**

**FIRST USE 7-4-1996; IN COMMERCE
7-4-1996.**

**FOR: ELECTRONIC MAIL SERVICES, IN
CLASS 38 (U.S. CLS. 100, 101 AND 104).**

**FIRST USE 7-4-1996; IN COMMERCE
7-4-1996.**

SER. NO. 75-272,783, FILED 4-10-1997.

EDWARD NELSON, EXAMINING ATTORNEY