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8 *Attorneys for Fornix Holdings LLC and CP Productions, Inc.*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF ARIZONA**

11 Fornix Holdings LLC and CP Productions, Inc.

12 *Plaintiffs,*

Case No.:

13
14 v.

15 John Doe #1 d/b/a DaftSex.com, John Doe #2 d/b/a
16 PornWild.com, EasyDNS Technologies Inc.,
17 Namecheap, Inc., Cloudflare, Inc., and Google, LLC

18 *Defendants.*

19 **PLAINTIFFS' EX PARTE APPLICATION FOR A**
20 **TEMPORARY RESTRAINING ORDER; ORDER TO SHOW CAUSE FOR**
21 **PRELIMINARY INJUNCTION; ORDER TO ALLOW ALTERNATIVE**
22 **SERVICE; AND ORDER TO GRANT LIMITED EXPEDITED DISCOVERY**
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1 Plaintiffs Fornix Holdings LLC (“Fornix”) and CP Productions, Inc. (“CP
2 Productions,” collectively with Fornix as “Plaintiffs”), by and through their counsel,
3 hereby apply *ex parte* to this Court pursuant to Federal Rules of Civil Procedure 65, 17
4 U.S.C. § 502(a), and Local Civil rule 65.1 for a temporary restraining order and
5 preliminary injunction against Defendant John Doe #1 d/b/a Daftsex.com (“DS”), John
6 Doe #2 d/b/a Pornwild.com (“PW” or collectively with DS “Infringer Defendants”),
7 Defendant Namecheap, Inc. (“Namecheap”), Defendant EasyDNS Technology, Inc.
8 (“EasyDNS”), Defendant Cloudflare, Inc. (“Cloudflare”), and Defendant Google, LLC
9 (“Google”). For the reasons set forth in Plaintiffs’ accompanying memorandum below,
10 Plaintiffs respectfully request that this Court issue a temporary restraining order (TRO)
11 to: (1) deactivate and cancel <dafsex.com>, <daftsex.tv>, and <daftsex.porn> (hereinafter
12 “DS Domain Names”) and <pornwild.com>, <pornwild.to>, and <pornwild-
13 to.nicepornproxy.com> (hereinafter “PW Domain Names” or collectively with DS
14 Domain Names “Infringing Websites”) and bar such domain names from re-registration;
15 (2) to deactivate Infringer Defendants’ websites located at <daftsex.com>, <daftsex.tv>,
16 <daftsex.porn>, <pornwild.com>, <pornwild.to>, and <pornwild-to.nicepornproxy.com>
17 (“Infringing Websites”) and permanently delete all information stored thereon relevant to
18 the one hundred and fifty-seven (157) videos registered with the US Copyright office
19 (“Registered Works”) and the remaining eight hundred and ten (810) videos whose
20 videos are in the process of being registered (“Unregistered Works” and collectively with
21 the Registered Works, “Plaintiffs’ Works”); (3) delete all copies of Plaintiffs’ Works that
22 have been uploaded to any third-party websites associated with DS and PW; (4) cease the
23 provision of all internet services for the maintenance and operation of the Infringing
24 Websites, including but not limited to domain name registration, hosting, security,
25 content delivery, and reverse proxy services; (5) order Google to remove the DS and PW
26 Websites from internet search results; (6) allow alternative service upon Website
27 Defendants via their email addresses registered with EasyDNS and Namecheap for
28 Infringing Websites; (7) permit expedited discovery directed to EasyDNS and

1 Namecheap to reveal the Infringer Defendants’ identity as the registrant of the Infringing
2 Websites; and (8) set a show cause hearing why said TRO should not become a
3 preliminary injunction against Infringing Defendants.

4 No notice was given to the John Doe #1 d/b/a DaftSex.com, John Doe #2 d/b/a
5 PornWild.com (hereinafter “Infringing Defendants”), as set forth in detail in the
6 Declaration of David L. Graves dated November 9, 2022 (“Graves Decl.”) and the
7 Declaration of Plaintiffs’ Attorney David D. Lin dated November 14, 2022 (“Lin Decl.”),
8 Plaintiffs will suffer immediate and irreparable injury, loss, or damage before Infringing
9 Defendants can be heard in opposition. Further, notice to Infringing Defendants should
10 not be required because under the current circumstances where Infringing Defendants
11 have hidden their identity and are engaging in a massive infringement scheme for profit,
12 Plaintiffs believe Infringing Defendants are likely to transfer the infringing materials and
13 the domain name at issue beyond the Court’s jurisdiction, thereby frustrating this motion.
14 *See* Fed. R. Civ. P. 65(b); LRCiv 65.1.

15 This application is supported by this Memorandum of Points and Authorities, the
16 Graves Decl. and exhibits attached thereto, the Lin Decl. and exhibits attached thereto,
17 and all other pleadings and papers filed in this proceeding, the argument of counsel, and
18 further evidence as the Court may consider at or before a hearing regarding this
19 Application of the hearing regarding the Order to Show Cause and preliminary injunction
20 requested herein.

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22 DATED this 14th day of November, 2022.

23 Respectfully submitted,

24 **LEWIS & LIN LLC**

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28 David D. Lin, Esq