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**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

Fornix Holdings LLC and CP Productions, Inc.

Plaintiffs,

v.

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

Defendants.

Case No.:

**[PROPOSED] TEMPORARY
RESTRAINING ORDER AND
ORDER TO SHOW CAUSE FOR
PRELIMINARY INJUNCTION**

Upon review of the verified complaint of Plaintiffs, FORNIX HOLDINGS LLC and CP PRODUCTIONS, INC.; the declaration of David L. Graves and the exhibits thereto; the declaration of David D. Lin and the exhibits thereto; and the memorandum of points and authorities in support of Plaintiffs’ “Ex Parte Application for a Temporary Restraining Order; Order To Show Cause For Preliminary Injunction; Order To Allow Alternative Service; Alternative Service; and Order To Grant Limited Expedited Discovery” against Defendant John Doe #1 d/b/a DaftSex.com (hereinafter referred to as “Defendant DS”) and John Doe #2 d/b/a PornWild.com (hereinafter referred to as “Defendant PW” and collectively with Defendant DS “Infringing Defendants”), it appears to the satisfaction of the court that this is a proper case for granting the temporary restraining order and order to show cause.

1 IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Plaintiffs’ *ex parte*
2 application for a temporary restraining order is granted. Pending the hearing and determination
3 of the order to show cause, the above-named Defendants; their officers, directors, employees,
4 agents, subsidiaries, distributors and all persons in active concert or participation with them
5 having notice of this Order; and those with actual notice of this Order, including any domain
6 name registrars, domain name registries or their administrators, and website hosting service
7 providers, are ordered to take the following steps to preserve the *status quo ante* and prevent
8 further irreparable injury to plaintiff and its customers:

- 9 1. The above-named Defendants, EasyDNS Technologies, Inc. (“EasyDNS”) and
10 Namecheap, Inc. (“Namecheap”), as the registrar(s) of record for the domain names
11 <daftsex.com>, <daftsex.tv>, <daftsex.porn>, <pornwild.com>, <pornwild.to>, and
12 <pornwild-to.nicepornproxy.com> (hereinafter “Infringing Domain Names”) listed
13 on Exhibit B and C to the Complaint (the “Infringing Domain Names”), or whomever
14 is the registrar of record of the Domain Name at the time this Order is entered, are
15 directed to, immediately and no later than 12 hours after service on EasyDNS
16 Technologies, Inc. via email at abuse@easydns.com and Namecheap, Inc. via email
17 at Legal@namecheap.com a copy of this Order, the complaint, and all moving papers:
18 a. disable the Infringing Domain Names;
19 b. transfer the Infringing Domain Names into an account with Namecheap and
20 EasyDNS, under Plaintiffs’ sole control, or a domain-name registrar of
21 Plaintiffs’ choosing;
22 c. place a registry hold on the Infringing Domain Names after said deactivation
23 and transfer(s) take place and maintain the Infringing Domain Names as
24 inactive and nontransferable pending further Order of this Court.
25 2. The above-named Defendant, Cloudflare, Inc., as the website hosting service provider
26 for the websites <daftsex.com>, <daftsex.tv>, <daftsex.porn>, <pornwild.com>,
27 <pornwild.to>, and <pornwild-to.nicepornproxy.com> (“Infringing Websites”), or
28 whomever is the website hosting service provider of record of the Infringing Domain

1 Names at the time this Order is entered, are directed to, immediately and no later than
2 12 hours after service on Cloudflare, Inc. via email at abuse@cloudflare.com a copy
3 of this Order, the complaint, and all moving papers:

- 4 a. suspend any services, including but not limited to the hosting service, content
5 delivery network to the Infringing Websites;
- 6 b. place an administrative lock on the Infringing Websites after said suspension
7 takes place to prevent Infringing Defendants or any third party from accessing
8 or downloading the content of the Infringing Websites and/or transferring
9 such content to another domain name or hosting service, pending further
10 Order of this Court.

11 3. The above-named Defendant Google, LLC remove the Infringing Websites from
12 Google search results.

13 IT IS FURTHER ORDERED that pending resolution of this lawsuit or further order of
14 the court, Plaintiffs, after receiving the Infringing Domain Names from the above-named
15 Infringing Defendants, shall not transfer or dispose of said Infringing Domain Names, but shall
16 retain them in order to restore same to the above-named Infringing Defendants if this court shall
17 ultimately determine that the above-named Infringing Defendants are entitled to own and operate
18 the said Infringing Domain Names.

19 IT IS FURTHER ORDERED that, pursuant to Fed. R. Civ. P. 65(c), Plaintiffs shall not
20 be required to give security given the likelihood of success on the merits of Plaintiffs' copyright
21 infringement claim, and the ongoing damage to Plaintiffs' business and revenues, and the fact that
22 the evidence indicates that the above-named Infringing Defendants would suffer no harm.

23 IT IS FURTHER ORDERED that, pursuant to Fed. R. Civ. P. 4(f)(3) and Ariz. R. Civ.
24 P. 4.1(k)(1), sufficient cause being shown therefor, counsel for Plaintiffs shall serve a copy of this
25 Order, the complaint, and all papers filed in support of this Order on Defendant DS at the email
26 address at daftsex.com@myprivacy.net and Defendant PW at the email address
27 43271254b4af449b89a9d684df665322.protect@withheldforprivacy.com. Further, pursuant to
28 Fed. R. Civ. P. 4(f)(3) and Ariz. R. Civ. P. 4.1(k)(1), sufficient cause being shown therefor,

1 counsel for Plaintiffs shall serve a copy of this Order, the complaint, and all papers filed in support
2 of this Order on EasyDNS by email to abuse@easydns.com and Namecheap by email to
3 abuse@namecheap.com, with an instruction to the registrars to forward such papers to any and all
4 email and mailing address(es) registered by Infringing Defendants with EasyDNS and Namecheap,
5 which service shall be deemed good and sufficient.

6 IT IS FURTHER ORDERED that, pursuant to Fed. R. Civ. P. 26(d), Plaintiffs are granted
7 expedited discovery directed at Namecheap, Inc. and EasyDNS Technologies, Inc. for information
8 that identifies, with specificity, Infringer Defendants.

9 IT IS FURTHER ORDERED that Plaintiffs shall provide notice of this Order by serving
10 a copy of this Order, the complaint, and all papers filed in support of this Order on Defendant
11 EasyDNS Technologies, Inc. via email abuse@easydns.com, Defendant Namecheap, Inc. via email
12 at Legal@namecheap.com, Defendant Cloudflare, Inc. via email at abuse@cloudflare.com, and
13 Defendant Google, LLC via google-legal-support@google.com on or before
14 _____, 2022.

15 IT IS FURTHER ORDERED that Defendant shall appear in Courtroom ____ at the
16 Courthouse, located at _____, on _____, **2022 at**
17 **__:__ a.m./p.m.**, to show cause why the interim relief awarded in this Order should not be
18 extended by issuance of a similarly worded preliminary injunction pending trial.

19
20 **IT IS SO ORDERED.**

21
22 Date: _____, 2022

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24 _____
25 U.S.D.J.
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