

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

GOOGLE LLC,

*Plaintiff,*

v.

DOE 1 a/k/a YUCHENG CHANG and  
DOES 2–25,

*Defendants.*

Civil Action No.: 1:25-cv-10440-JSR

**GOOGLE LLC'S MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR  
DEFAULT JUDGMENT AND PERMANENT INJUNCTION**

**TABLE OF CONTENTS**

	<b><u>Page</u></b>
INTRODUCTION .....	5
STATEMENT OF FACTS .....	5
A.    Procedural History .....	5
B.    Injunctive Relief.....	7
C.    Google Properly Served Defendants.....	8
LEGAL STANDARD.....	10
ARGUMENT .....	10
I.    Google is Entitled to Default Judgment.....	10
II.   Google is Entitled to a Permanent Injunction.....	12
III.  Google Withdraws Its Damages Request. ....	15

## TABLE OF AUTHORITIES

	Page(s)
<b>Cases</b>	
<i>Antetokounmpo v. Searcy</i> , 2021 WL 3233417 (S.D.N.Y. May 20, 2021) .....	11
<i>BMaddox Enters. LLC v. Milad Oskouie, Osko M Ltd.</i> , 2021 WL 3675072 (S.D.N.Y. Aug. 18, 2021).....	13
<i>Bricklayers and Allied Craftworkers Local 2, Albany, N.Y. Pension Fund v. Moulton Masonry &amp; Constr.</i> , 779 F.3d 182 (2d Cir. 2015).....	11
<i>Church of Scientology Int’l v. Elmira Mission of the Church of Scientology</i> , 794 F.2d 38 (2d Cir. 1986).....	14
<i>eBay Inc. v. MercExchange LLC</i> , 547 U.S. 388 (2006).....	14
<i>Finkel v. Romanowicz</i> , 577 F.3d 79 (2d Cir. 2009).....	11
<i>FTC v. 1263523 Ontario, Inc.</i> , 205 F. Supp. 2d 205 (S.D.N.Y. 2002).....	11
<i>FTC v. Verity Int’l, Ltd.</i> , 2000 WL 1805688 (S.D.N.Y. Dec. 8, 2000) .....	15
<i>FXDirectDealer, LLC v. Abadi</i> , 2012 WL 1155139 (S.D.N.Y. Apr. 5, 2012).....	15
<i>Guggenheim Cap., LLC v. Birnbaum</i> , 722 F.3d 444 (2d Cir. 2013).....	11
<i>Indymac Bank, F.S.B. v. Nat’l Settlement Agency, Inc.</i> , 2007 WL 4468652 (S.D.N.Y. Dec. 20, 2007) .....	12, 13
<i>Kelly Toys Holdings, LLC v. alialialiLL Store</i> , 606 F. Supp. 3d 32 (S.D.N.Y. 2022).....	12, 13
<i>Laboratorios Rivas, SRL v. Ugly &amp; Beauty, Inc.</i> , 2013 WL 5977440 (S.D.N.Y. Nov. 12, 2013).....	13, 14
<i>Mason Tenders Dist. Council v. Duce Constr. Corp.</i> , 2003 WL 1960584 (S.D.N.Y. Apr. 25, 2003).....	12, 13

<i>Microsoft Corp. v. Does 1–2</i> , 2025 WL 2933087 (E.D.N.Y. Aug. 6, 2025).....	15
<i>Microsoft Corp. v. Does 1-8</i> , 2015 WL 4937441 (E.D. Va. Aug. 17, 2015).....	14
<i>N.Y.C.L. Union v. N.Y.C. Transit Auth.</i> , 684 F.3d 286 (2d Cir. 2012).....	13
<i>Register.com, Inc. v. Verio, Inc.</i> , 356 F.3d 393 (2d Cir. 2004).....	14
<i>Rovio Ent., Ltd. v. Allstar Vending, Inc.</i> , 97 F. Supp. 3d 536 (S.D.N.Y. 2015).....	13
<i>US Airways, Inc. v. US Airline Pilots Ass’n</i> , 813 F. Supp. 2d 710 (W.D.N.C. 2011) .....	15
<b>Statutes</b>	
15 U.S.C. § 1114.....	6
15 U.S.C. § 1125.....	6
18 U.S.C. § 1030.....	6
18 U.S.C. § 1962 .....	6
<b>Rules</b>	
Fed. R. Civ. P. 8(b)(6).....	11
Fed. R. Civ. P. 12(a)(1)(A)(i) .....	7
Fed. R. Civ. P. 55(b)(2).....	6, 11
Fed. R. Civ. P. 65(1) .....	6
Local Civ. Rule 7.1(c).....	18
Local Civ. Rule 55.2.....	6

## INTRODUCTION

Plaintiff Google LLC (“Google”) respectfully moves the Court to enter default judgment and issue a permanent injunction to prevent Defendants Doe 1 a/k/a Yucheng Chang and Does 2–25 (collectively, “Defendants”), a criminal enterprise (the “Darcula Enterprise” or the “Enterprise”), from using novel software to facilitate large-scale phishing attacks that have harmed over one million victims, including Google, and to prevent further harm to Google and the general public that would be caused absent such permanent injunctive relief. Defendants failed to timely appear, and on March 16, 2026, the clerk entered a Certificate of Default.

As set forth in Google’s pleadings and this Court’s prior orders, the Defendants design and execute novel phishing attacks, using artificial intelligence technology to mimic legitimate websites and dupe victims into disclosing personal and financial information. These attacks have swindled millions of victims globally, including Google customers, and have exploited Google’s reputation through the unauthorized use of its trademarks and impersonation of Google’s services.

Google now seeks—pursuant to Local Civil Rule 55.2 and Federal Rules of Civil Procedure 55(b)(2) and 65—(1) default judgment against the Defendants, and (2) a permanent injunction prohibiting Defendants from operating the Enterprise and permanently take down the malicious domains used by Defendants to perpetrate their criminal schemes.

## STATEMENT OF FACTS

### A. Procedural History

Google filed this suit on December 17, 2025, alleging that Defendants’ criminal activity violated (1) the Racketeer Influenced and Corrupt Organizations Act (“RICO”), 18 U.S.C. § 1962(c)–(d) (Count I); (2) the Lanham Act, 15 U.S.C. §§ 1114(1), 1125(a)(1)(A), 1125(a)(1)(B) (Count II); and (3) the Computer Fraud and Abuse Act (“CFAA”), 18 U.S.C. § 1030(a)(6) (Count III). ECF No. 1. Google moved for an Emergency *Ex Parte* Temporary Restraining Order and

Order to Show Cause (“TRO Motion”) to enjoin Defendants’ unlawful conduct. *See* Declaration of Laura Harris in Support of Google’s Motion for Default Judgment and Permanent Injunction (“Harris Decl.”) ¶ 6. This Court entered an Emergency *Ex Parte* Temporary Restraining Order and Order to Show Cause (“TRO”) on December 17, 2025. ECF No. 18; Harris Decl. ¶ 6. Pursuant to the alternative service requirements provided for in the TRO, Google duly served Defendants with its Complaint, the TRO, the TRO Motion, and all attendant papers on January 4, 2026. ECF No. 22; Harris Decl. ¶¶ 12–15, 18–19.

On January 9, 2026, the Court extended the TRO and ordered Google to submit supplemental briefing to address the implications of *Smart Study Co. v. Shenzhenshixindajixieyouxiangongsi*, 2025 WL 3672740 (2d Cir. Dec. 18, 2025) on Google’s request for alternative service. ECF No. 25; Harris Decl. ¶ 6. Google submitted its supplemental briefing on January 23, 2026. ECF Nos. 27–30; Harris Decl. ¶ 6. On February 9, 2026, the Court granted Google’s Proposed Preliminary Injunction, ECF No. 34, and separately issued a Memorandum Order addressing the issue of service and granting Google’s request to serve Defendants by the alternative means, including by email and website publication. ECF No. 33; Harris Decl. ¶ 6. Google then duly served the Preliminary Injunction Order on Defendants on February 9, 2026. ECF No. 35; Harris Decl. ¶ 16. On February 19, 2026, the Clerk issued summons and Google served that summons on Defendants by email and website publication that same day. ECF No. 35; Harris Decl. ¶ 17. Defendants have failed to appear, defend, or plead in response to the Complaint, TRO, or Preliminary Injunction Order. Accordingly, no later than March 13, 2026, Defendants were in default under Federal Rule of Civil Procedure 12(a)(1)(A)(i). On March 16, 2026, the Clerk entered a Certificate of Default. ECF No. 38; Harris Decl. ¶ 7.

## B. Injunctive Relief

The Court has made several factual findings in the course of issuing preliminary injunctive relief to Google, including that:

- ***The Court has jurisdiction***, ECF No. 34 ¶¶ 1–2;

- ***Google will suffer immediate and irreparable harm absent the injunctive relief it seeks here and that the Court has ordered preliminarily.*** Google has shown that Defendants—through their operation of the Darcula Enterprise to participate in and carry out numerous criminal phishing scams (the “Darcula Schemes”)—have threatened the security of the Internet and are causing ongoing and irreparable harm to Google and the public by using phishing attacks to steal personal and financial information, defrauding unsuspecting targets, impairing Google’s reputation and goodwill, and causing Google (and numerous others) unrecoverable financial losses. ECF No. 34 ¶ 6.

- ***Google has shown a likelihood of success on the merits of its Lanham Act claims.*** Defendants violated Sections 1114 and 1125(a)(1)(A) of the Lanham Act by exploiting Google’s trustworthy, well-known, valid, protectable, and registered Marks on their spoofed websites to deceive consumers. ECF No. 34 ¶ 9. Google also demonstrated that Defendants violated Section 1125(a)(1)(B) of the Lanham Act by deceiving Internet users by using Google’s Marks, not from or endorsed by Google, on their spoofed websites to make their websites appear real. The messages bearing Google Marks are placed in interstate commerce on the Internet, and Google has demonstrated injury to its goodwill and through costs to combat the Darcula Schemes. *Id.*

- ***Google has shown a likelihood of success on the merits of its RICO claims.*** Defendants violated and continue to violate the RICO statute by showing that Defendants are active participants in the operation and management of the Darcula Enterprise, which uses Magic Cat software to dupe people in the United States and around the world into clicking on malicious links leading to spoofed websites as part of phishing schemes. Google also demonstrated that Defendants were part of an enterprise, engaged in a pattern of racketeering activity, and that Google has suffered injury to its business or property as a result of these predicate offenses by devoting substantial financial resources to investigate and remediate Defendants’ criminal schemes in order to protect its goodwill and reputation. ECF No. 34 ¶ 10. Google has also demonstrated that the Defendants have engaged in a RICO conspiracy, because the links among the Defendants—such as use of the Magic Cat software, communication over dedicated Telegram channels, and the methods used to deploy phishing schemes using Magic Cat and other Enterprise-controlled resources—demonstrate that the Enterprise formed an agreement as part of a common scheme and conspiracy. *Id.*

• ***Google has shown a likelihood of success on the merits of its CFAA claim.*** Defendants violated and continue to violate the CFAA by, knowingly and with intent to defraud, transferring and selling phished account credentials and authorization codes to other members of the Enterprise and other cybercriminals through Telegram channels and other online forums. ECF No. 34 ¶ 11.

Based on these findings, through its Preliminary Injunction Order, the Court enjoined Defendants from perpetrating further violations of law and ordered third parties hosting or providing services to cause the Internet domains used by Defendants to effectuate their Enterprise to be disabled. ECF No. 34 at 8–13.

### **C. Google Properly Served Defendants**

This Court’s TRO and Preliminary Injunction Order set forth alternative methods by which Google could effectuate service—including by email and publication on a website. *See* ECF Nos. 18, 34. Google effectuated or attempted service by each alternative method ordered by the Court as follows:

***Email.*** On January 4, 2026, King & Spalding attempted to effectuate service by email, as authorized by the Court. *See* Harris Decl. ¶¶ 13–15. Google identified 5 email addresses associated with domains listed in Appendix A and Google also received from the registrars 26 email addresses used to register domains listed in Appendix A. Harris Decl. ¶ 12. King & Spalding received delivery failure notifications for four of the 31 email addresses. Harris Decl. ¶ 14. On February 9, 2026, King & Spalding attempted to effectuate service of the Preliminary Injunction Order by email. Harris Decl. ¶ 16. On February 19, 2026, King & Spalding attempted to effectuate service of additional filings, including the Summons issued by the clerk that same day, to the 31 email addresses previously mentioned. Harris Decl. ¶ 17. King & Spalding received delivery-failure notifications for 10 of the 31 email addresses. Harris Decl. ¶ 17.

***Publication.*** Google also effectuated service by publication through a publicly available website, as authorized by the Court. Harris Decl. ¶ 18. On January 4, 2026, Google published the

website magiccatdarculaserviceofprocess.com, which contains links to all relevant pleadings and orders as well as contact information for Google’s counsel. Harris Decl. ¶ 19. That website is routinely updated. Harris Decl. ¶ 19.

The website prominently displays the following text:

Plaintiff Google LLC (“Google”) has sued Defendants Does 1-25 associated with the Internet domains listed in the pleading set forth below. Google alleges that Defendants have deployed a phishing-as-a-service model to facilitate and execute phishing attacks designed to steal personal and financial information, and Defendants have misused Google trademarks in their scheme. Google alleges that, through these actions, the Defendants have violated federal law. Google sought and received a temporary restraining order enjoining the Defendants from these and other activities and directing the third parties associated with Defendants’ Internet domains to take all steps necessary to disable access to and operation of Magic Cat/Darcula-associated domains. Google intends to seek a preliminary injunction and other equitable relief. Full copies of the complaint, related filings, and orders from the Court are available below.

NOTICE TO DEFENDANT: READ THESE PAPERS CAREFULLY! A hearing to show cause why the Court should not enter a Preliminary Injunction will be held on January 9, 2026 at 10 a.m.

You must “appear” in this case or the other side will win automatically. To “appear” you must file with the court a legal document called a “motion” or “answer.” The “motion” or “answer” must be given to the court clerk or administrator within 21 days of the date of first publication specified herein. It must be in proper form and have proof of service on Google’s attorney, Laura Harris, King & Spalding LLP, 1290 Avenue of the Americas, 14th Fl., New York, NY 10104-0101. If you have questions, you should consult with your own attorney immediately.

**Actual Notice.** In addition to Google’s efforts to serve Defendants, Defendants had actual notice of this lawsuit from Google’s disruption efforts and the media attention surrounding those efforts. Following the Court’s issuance of the TRO on December 17, 2025, Google began its efforts to take down the Internet domains associated with the Darcula Schemes and the Enterprise. Harris Decl. ¶ 23. Google’s efforts have led to the suspension or disruption of 325 of 392 currently known domains associated with the Darcula Enterprise. Harris Decl. ¶ 23. Furthermore, there has been significant media coverage of the litigation. Harris Decl. ¶ 24.

## LEGAL STANDARD

Pursuant to FRCP 55(b)(2), a district court may enter a default judgment when a party has failed to plead or otherwise defend against the action. *See, e.g., FTC v. 1263523 Ontario, Inc.*, 205 F. Supp. 2d 205, 208 (S.D.N.Y. 2002). “Once the Clerk issues a certificate of default, the moving party may apply for entry of default judgment, pursuant to Rule 55(b).” *Antetokounmpo v. Searcy*, 2021 WL 3233417, at \*2 (S.D.N.Y. May 20, 2021). In deciding a motion for default judgment, the Court must accept all of the factual allegations in the plaintiff’s complaint as true and draw all reasonable inferences in plaintiff’s favor. *See Finkel v. Romanowicz*, 577 F.3d 79, 84 (2d Cir. 2009); *see also* Fed. R. Civ. P. 8(b)(6) (“An allegation—other than one relating to the amount of damages—is admitted if a responsive pleading is required and the allegation is not denied.”).

## ARGUMENT

The Court should grant Google default judgment against all Defendants and enter a permanent injunction.

### **I. Google is Entitled to Default Judgment.**

“[C]ourts within this district consider three factors” when deciding both whether to enter default judgment and whether to vacate an entry of default: (1) “whether the defendant has a meritorious defense to plaintiff’s claims”; (2) “whether the defendant’s default was willful”; and (3) “the level of prejudice the non-defaulting party would suffer as a result of the denial of the motion for default judgment.” *Guggenheim Cap., LLC v. Birnbaum*, 722 F.3d 444, 454–55 (2d Cir. 2013). Whether to enter default judgment and whether to set aside an entry of default are both left to the district court’s sound discretion. *See, e.g., Bricklayers and Allied Craftworkers Local 2, Albany, N.Y. Pension Fund v. Moulton Masonry & Constr.*, 779 F.3d 182, 186 (2d Cir. 2015); *Guggenheim*, 722 F.3d at 454. All three factors weigh in favor of entering default judgment.

**Willfulness.** When a party fails to appear after valid and effective service of process, courts routinely find the default is willful. *See Indymac Bank, F.S.B. v. Nat'l Settlement Agency, Inc.*, 2007 WL 4468652, at \*1 (S.D.N.Y. Dec. 20, 2007); *see also Kelly Toys Holdings, LLC v. alialialiLL Store*, 606 F. Supp. 3d 32, 49 (S.D.N.Y. 2022) (concluding default judgment was warranted, upon reasoning that the defaulting defendants had “willfully failed to appear, answer, or otherwise respond to the Complaint or comply with the . . . TRO and PI Order”). Here, Defendants have been served in multiple ways, have actual notice, and have still not appeared. Accordingly, the willfulness factor weighs in favor of entering default judgment against the Defendants.

**Meritorious Defenses.** When a defaulting party fails to present arguments in its defense, the court may presume the absence of a meritorious defense. *See, e.g., Kelly Toys Holdings, LLC*, 606 F. Supp. 3d at 49 (“By virtue of their failure to appear, Defaulting Defendants have likewise failed to present any meritorious defenses.”); *Indymac Bank, F.S.B.*, 2007 WL 4468652, at \*1 (“[T]he Court is unable to determine whether these defendants have a meritorious defense to Plaintiff’s allegations because they have presented no such defense to the Court. Thus, Plaintiff’s allegations are deemed admitted.”); *Mason Tenders Dist. Council v. Duce Constr. Corp.*, 2003 WL 1960584, at \*2 (S.D.N.Y. Apr. 25, 2003) (finding that the second factor regarding meritorious defenses “need not be addressed” when the defendants “have failed to proffer any defense and are therefore deemed to have admitted the well-pleaded allegations of the Complaint”). Defendants in this action have failed to appear at all, let alone present meritorious defenses. Accordingly, this factor weighs in favor of entering default judgment as well.

**Prejudice.** Finally, denial of a motion for default judgment would be unfairly prejudicial to Google given that Defendants have failed to respond to any of this Court’s orders, and there is

no indication that “requiring [Google] to take further steps prior to a determination on the merits would be effective in eliciting a response from Defendants.” *Mason Tenders Dist. Council*, 2003 WL 1960584, at \*3; *see also Indymac Bank, F.S.B.*, 2007 WL 4468652, at \*1 (finding that denial of motion for default judgment would be unfairly prejudicial due to defendants’ failure “to appear, defend, or plead in response to any of the substantive allegations”); *Kelly Toys Holdings, LLC*, 606 F. Supp. 3d at 49 (concluding that denial of motion for default judgment “would be highly prejudicial to Plaintiff since Plaintiff would be left without any recourse to address Defaulting Defendants’ unlawful conduct”). Accordingly, this factor also weighs in favor of entering default judgment against the Defendants.

Default judgment is thus appropriate and warranted here. *See Indymac Bank, F.S.B.*, 2007 WL 4468652, at \*1 (finding that “all three factors weigh in favor of granting Plaintiff’s request for default judgment”).

## **II. Google is Entitled to a Permanent Injunction.**

“It is well established that a court may grant a permanent injunction as part of a default judgment.” *BMaddox Enters. LLC v. Milad Oskouie, Osko M Ltd.*, 2021 WL 3675072, at \*15 (S.D.N.Y. Aug. 18, 2021); *see Rovio Ent., Ltd. v. Allstar Vending, Inc.*, 97 F. Supp. 3d 536, 546 (S.D.N.Y. 2015) (collecting cases). “The requirements for a permanent injunction are ‘essentially the same’ as for a preliminary injunction, except that the moving party must demonstrate ‘actual success’ on the merits.” *N.Y.C.L. Union v. N.Y.C. Transit Auth.*, 684 F.3d 286, 294 (2d Cir. 2012). Because a default judgment is warranted, Google is also entitled to a permanent injunction.

Google has demonstrated actual success on the merits several times over. The Court already found a likelihood of success on the merits when it granted a TRO and a preliminary injunction, the latter of which remains in effect. *See* ECF Nos. 18, 34. Now that Defendants have defaulted, Google’s well-pleaded facts are deemed admitted. *See, e.g., Laboratorios Rivas, SRL v.*

*Ugly & Beauty, Inc.*, 2013 WL 5977440, at \*4 (S.D.N.Y. Nov. 12, 2013) (“[A] party’s default is deemed to constitute a concession of all well pleaded allegations of liability.”), *report and recommendation adopted*, 2014 WL 112397 (S.D.N.Y. Jan. 8, 2014). Moreover, “as long as the complaint has stated a valid cause of action,” a defendant’s default establishes the defendant’s liability. *See Laboratorios Rivas, SRL*, 2013 WL 5977440, at \*4. Here, Defendants have clearly defaulted, and the allegations set forth in Google’s Complaint state valid causes of action for violations of RICO, the Lanham Act, and the CFAA.

In addition to demonstrating success on the merits, to secure a permanent injunction, a plaintiff must demonstrate that: (1) it has suffered an irreparable injury; (2) remedies available at law are inadequate to compensate for that injury; (3) in light of the hardships on the plaintiff and defendant, a remedy in equity is warranted; and (4) the public interest would not be disserved by a permanent injunction. *eBay Inc. v. MercExchange LLC*, 547 U.S. 388, 391 (2006). All four factors are met here.

***Irreparable injury and inadequate remedies at law.*** Google has established that the Darcula Enterprise harmed Google, its users, and numerous others, and that legal remedies are inadequate to compensate for that harm. It is well-established that a company’s “loss of reputation, good will, and business opportunities” constitutes irreparable harm. *Register.com, Inc. v. Verio, Inc.*, 356 F.3d 393, 404 (2d Cir. 2004); *accord Church of Scientology Int’l v. Elmira Mission of the Church of Scientology*, 794 F.2d 38, 44 (2d Cir. 1986). Here, Defendants’ actions damaged Google’s goodwill and its reputation, which Google has cultivated over decades with the development of numerous products used by billions of people each day. That injury to business goodwill constitutes irreparable harm. *E.g., Church of Scientology Int’l v. Elmira Mission of Church of Scientology*, 794 F.2d 38, 44 (2d Cir. 1986); *see also, e.g., Microsoft Corp. v. Does 1-*

8, 2015 WL 4937441, at \*10 (E.D. Va. Aug. 17, 2015) (issuing default judgment and a permanent injunction and finding that the Shylock botnet “is damaging to the Plaintiffs’ brands and the customer goodwill”).

***Balance of the equities.*** The balance of the equities decidedly tip in Google’s favor. Defendants will suffer no harm to any legitimate interest if this Court issues a permanent injunction. Defendants’ criminal enterprise is illegal, defrauds consumers, and injures Google. There are no countervailing equities to consider. *See, e.g., FTC v. Verity Int’l, Ltd.*, 2000 WL 1805688, at \*1 (S.D.N.Y. Dec. 8, 2000) (finding that the balance of equities weighs in favor of injunctive relief where defendant’s practices violate a federal statute); *US Airways, Inc. v. US Airline Pilots Ass’n*, 813 F. Supp. 2d 710, 736 (W.D.N.C. 2011) (same). There is simply no reason why Defendants should be permitted to reconstitute an illegal scheme that injures Google, its customers, and the public.

***Public interest.*** Finally, a permanent injunction would serve the public interest. The public interest is clearly served by enforcing statutes designed to protect the public, such as RICO, the Lanham Act, and the CFAA. *See, e.g., FXDirectDealer, LLC v. Abadi*, 2012 WL 1155139, at \*8 (S.D.N.Y. Apr. 5, 2012) (“[T]he public has an interest in seeing that . . . cyber-fraud is prevented.”). The Darcula Enterprise has defrauded over a million victims, while using their ill-gotten funds to support further criminal schemes. Without an injunction, the Defendants would regain access to its infrastructure and defraud more victims.

The Court’s preliminary injunction therefore should be made permanent. *See Microsoft Corp. v. Does 1–2*, 2025 WL 2933087 (E.D.N.Y. Aug. 6, 2025) (granting default judgment and a permanent injunction against doe defendants in a case with similar claims involving a phishing scheme).

**III. Google Withdraws Its Damages Request.**

Google's Complaint sought a judgment awarding (i) actual damages, (ii) enhanced, exemplary, and special damages, and (iii) attorneys' fees and costs, *see* ECF No. 1; however, Google hereby withdraws its request for monetary damages in connection with its motion for Default Judgment and a Permanent Injunction.

**CONCLUSION**

For the foregoing reasons, this Court should enter default judgment for Google and issue a permanent injunction against Defendants.

Dated: March 18, 2026

Respectfully submitted,

/s/ Laura Harris

Laura Harris

Grace Miller

**KING & SPALDING LLP**

1290 Avenue of the Americas, 14th Fl.

New York, NY 10104-0101

Tel: (212) 556-2100

Fax: (212) 556-2222

lharris@kslaw.com

gmiller@kslaw.com

Christine Carletta

Paul Weeks (admitted *pro hac vice*)

**KING & SPALDING LLP**

1700 Pennsylvania Ave., NW, Suite 900

Washington, DC 20006-4707

Tel: (202) 737-0500

Fax: (202) 626-3737

ccarletta@kslaw.com

pweeks@kslaw.com

*Counsel for Plaintiff Google LLC*

CERTIFICATE OF COMPLIANCE

I, Laura Harris, an attorney duly admitted to practice before this Court, hereby certify pursuant to Local Rule 7.1(c), that the foregoing Google LLC's Memorandum of Law in Support of Its Motion for Default Judgment and a Permanent Injunction was prepared using Microsoft Word and contains 3,427 words in accordance with Local Rule 7.1(c).

/s/ Laura Harris

Laura Harris