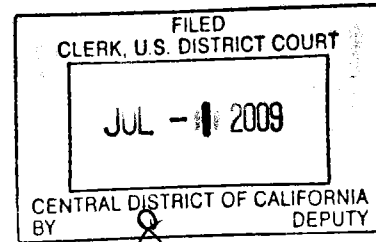


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 6 Attorneys for Plaintiff  
 Global Benefits Group, Inc.

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2009 JUL - 1 PM 12: 52  
 U.S. DISTRICT COURT  
 CENTRAL DIST. OF CALIF.  
 LOS ANGELES

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 8 UNITED STATES DISTRICT COURT  
 9 CENTRAL DISTRICT OF CALIFORNIA  
 10 SOUTHERN DIVISION

11 GLOBAL BENEFITS GROUP, INC., a )  
 12 California corporation,

13 Plaintiff,

14 vs.

15 CELINE ZHANG, PATRICK  
 16 HOPKINS, REZA KHADIVI,  
 SHANGHAI TAI KAI a.k.a. STK and  
 Does 1 through 10,

17 Defendants.

CASE NO. CV094667 CAS (CTX)

~~PROPOSED~~ TEMPORARY  
~~RESTRAINING ORDER AND~~  
 ORDER TO SHOW CAUSE RE  
 PRELIMINARY INJUNCTION

Courtroom: 5  
 Date: TBD  
 Time: TBD

[Filed Concurrently With Notice of  
 Application and Application for  
 Temporary Restraining Order and  
 Declarations of Andrew Thorburn,  
 Robert Sass, Linda McCabe Roberts  
 and Richard B. Hopkins, II]

Judge: Hon. Christina A. Snyder

Trial Date: none set

1 TO DEFENDANTS CELINE ZHANG, PATRICK HOPKINS, REZA  
2 KHADIVI AND SHANGHAI TAI KAI a.k.a. STK:

3  
4 YOU AND EACH OF YOU ARE HEREBY ORDERED TO SHOW CAUSE  
5 at 10:00 a.m. on August 3, 2009 or as soon thereafter as counsel may be heard  
6 in the courtroom of the Honorable Christina A. Snyder, located at the United States  
7 District Court, Central District, Courtroom 5, 312 N. Spring Street, Los Angeles, CA,  
8 why you, your officers, agents, servants, employees and attorneys and those in active  
9 concert or participation with you or them, should not be restrained and enjoined  
10 pending trial of this action from doing, committing, abiding, causing or abetting any  
11 of the following:

- 12
- 13 a. Using the name Global Benefits Group, GBG, TieCare International,  
14 TieCare and any variations or modification of these and all other  
15 names, service marks, trademarks or trade dress of Global Benefits;
  - 16 b. Transferring funds received by current or former clients from existing  
17 GBG bank accounts to other accounts of third parties;
  - 18 c. Soliciting or entering into any agreement with any current or former  
19 clients of GBG;
  - 20 d. Redirecting traffic from the website www.gbg.com.cn to any other  
21 website and issue a disclaimer on the www.gbg.com.cn website that  
22 Shanghai Tai Kai is no longer associated with GBG or TieCare  
23 International;
  - 24 e. Communicating with clients, insurance companies or other entities, in  
25 such a way that implies any association with GBG or TieCare  
26 International;
- 27  
28

- 1 f. Using or otherwise accessing or copying any data acquiring by or on  
2 behalf of GBG, including procedure manuals, customer lists,  
3 premium charts, and all other data relating to the GBG business;  
4 g. Accessing the GBG Information and Computer Systems and all  
5 Account Information;  
6 h. Disclosing GBG Information and Computer System or Account  
7 Information or render services to any person, corporation, association  
8 or other entity.

9  
10 ~~PENDING HEARING on the above Order to Show Cause, you, your officers,~~  
11 ~~agents, servants, employees and attorneys and all those in active concert of~~  
12 ~~participation with you or them ARE HEREBY RESTRAINED AND ENJOINED~~  
13 ~~from doing, committing, abiding, causing or abetting any of the following:~~

- 14  
15 a. Using the name Global Benefits Group, GBG, TieCare International,  
16 TieCare and any variations or modification of these and all other  
17 names, service marks, trademarks or trade dress of Global Benefits;  
18 b. Transferring funds received by current or former clients from existing  
19 GBG bank accounts to other accounts of third parties;  
20 c. Soliciting or entering into any agreement with any current or former  
21 clients of GBG;  
22 d. Redirecting traffic from the website www.gbg.com.cn to any other  
23 website and issue a disclaimer on the www.gbg.com.cn website that  
24 Shanghai Tai Kai is no longer associated with GBG or TieCare  
25 International;  
26 e. Communicating with clients, insurance companies or other entities, in  
27 such a way that implies any association with GBG or TieCare  
28 International;

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- ~~f. Using or otherwise accessing or copying any data acquiring by or on behalf of GBG, including procedure manuals, customer lists, premium charts, and all other data relating to the GBG business;~~
- ~~g. Accessing the GBG Information and Computer Systems and all Account Information;~~
- ~~h. Disclosing GBG Information and Computer System or Account Information or render services to any person, corporation, association or other entity.~~

~~The above Temporary Restraining Order is effective on Plaintiff's filing an undertaking in the sum of \$ \_\_\_\_\_.~~ This Order to Show Cause and supporting papers must be served on Defendants no later than 14 days before the date set for hearing, and proof of service shall be filed no later than July 24, 2009 court days before the hearing. Any response or opposition to this Order to Show Cause must be filed and personally served on Plaintiff's counsel no later than July 27, 2009 ~~court days before the date set for hearing,~~ and proof of service shall be filed no later than July 31, 2009 ~~court days before the hearing.~~

DATED: July 1, 2009

*Christina A. Sample*  
United States District Judge