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 6 CVPARTNERS, INC.

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10 Attorneys for Defendant
 11 MATTHEW HINDE

12 UNITED STATES DISTRICT COURT
 13 FOR THE NORTHERN DISTRICT OF CALIFORNIA

14 CVPARTNERS, INC., a California
 15 corporation,

16 Plaintiff,

17 v.

18 JEANMARIE BOBEN, an individual;
 19 TYLER HUBBS, an individual; MATT
 20 HINDE, an individual; and PATRICIA
 REDINGTON, an individual; ANDY
 DUNAYCZAN, an individual; and
 DOES 1-15,

21 Defendants.

No. CV 09 00689 SI

22 **STIPULATION AND [PROPOSED]
 23 ORDER FOR PERMANENT INJUNCTION
 24 AGAINST MATTHEW HINDE**

25 Plaintiff CVPARTNERS, INC. ("CVPartners" or "Plaintiff") and Defendant
 26 MATTHEW HINDE ("Defendant" or "Hinde"), by and through their respective counsel of
 27 record (collectively, the "Parties") hereby stipulate and agree to the entry of a permanent
 28 injunction against Hinde, or any entity or person acting by, through or in concert with
 him, as follows:

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- 1 1. Requiring Hinde to delete any information in his LinkedIn, Facebook, or
2 any other web-based account pertaining to any individual or entity who is
3 known to be a CVPartners Client (defined as an individual or entity seeking
4 to fill a job opening, with whom CVPartners did business or who
5 CVPartners represented during Hinde's employment with CVPartners) or
6 CVPartners Candidate (defined as an individual seeking a job with whom
7 CVPartners did business or who CVPartners represented during Hinde's
8 employment), except information pertaining to a CVPartners Client or
9 CVPartners Candidate with whom Hinde had a relationship prior to his
10 employment with CVPartners.
- 11 2. Requiring Hinde to return, delete, and/or erase, as directed by CVPartners,
12 any CVPartners data or documents stored on any devices capable of
13 storing, transferring or processing data in his possession or control.
- 14 3. Enjoining Hinde, for a period of two years from the date his employment
15 with CVPartners terminated, from entering into a partnership with, working
16 with in any capacity, or becoming employed by defendants Jeanmarie
17 Boben, Tyler Hubbs, Patricia Redington, or any entity owned or operated
18 by any or all of said defendants.
- 19 4. Enjoining Hinde, for a period of two years from the date his employment
20 with CVPartners terminated, from soliciting or doing business with any
21 individual or entity who was and is known to be a CVPartners Client or
22 CVPartners Candidate, in the recruiting areas of finance and accounting,
23 information technology, human resources, scientific, clinical research or
24 regulatory affairs. Hinde shall not be enjoined from soliciting or doing
25 business with a CVPartners Client or CVPartners Candidate with whom
26 Hinde had a relationship prior to his employment with CVPartners.
- 27 5. Enjoining Hinde from disclosing to any third party or using for himself any
28 information concerning the business or business practices of CVPartners,

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learned by Hinde during his employment with CVPartners, unless express written approval is obtained before such disclosure or use.

6. Enjoining Hinde, for a period of two years from the date his employment with CVPartners terminated, from hiring or causing to be hired any current employee of CVPartners, and from hiring or causing to be hired defendants Jeanmarie Boben, Tyler Hubbs, or Patricia Redington.

IT IS SO STIPULATED between the Parties.

DATED: April 30, 2009

HANSON BRIDGETT LLP

By: 
SANDRA L. RAPPAPORT
Attorneys for Plaintiff
CVPARTNERS, INC.

DATED: April 30, 2009

MORGAN, LEWIS & BOCKIUS, LLP

By: 
L. JULIUS M. TURMAN
Attorneys for Defendant
MATT HINDE

IT IS SO ORDERED:

DATED: _____


HONORABLE SUSAN ILLSTON
U.S. District Court Judge