

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO  
**Judge Philip A. Brimmer**

Civil Action No. 09-cv-02616-PAB-KLM

NOBLE SYSTEMS CORPORATION,  
a Georgia corporation,

Plaintiff,

vs.

TECH SQUAD LLC, a Colorado  
limited liability company;  
SIMPLE FOCUS LLC, a Colorado limited  
liability company d/b/a TECH SQUAD LLC, a  
Colorado limited liability company;  
DANIEL SCHAEFER, an individual,  
DAVID NOAH SEIS, an individual, and  
JOHN DOES 1 through 4,

Defendants.

---

**PERMANENT INJUNCTION**

---

This matter is before the Court on the parties' joint motion for entry of a stipulated permanent injunction ("Joint Motion") [Docket No. 21]. The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1332(a). The parties have stipulated that:

1. Noble Systems Corporation ("Noble" or "Plaintiff") is a Georgia corporation, with its principal place of business in Atlanta, Georgia. Noble provides contact center technology, including products like predictive dialing, call management, agent desktop, digital recording, messaging, IP and VoIP, IP services, professional consulting, systems implementation, support and training.

2. Defendant Tech Squad LLC is a Colorado limited liability company whose principal place of business is located in Commerce City, Colorado. Its sole members are Defendants Noah David Seis (“Seis”) and Daniel Schaefer (“Schaefer”). Each of Defendants Seis and Schaefer is a citizen and domiciliary of Colorado.

3. Defendant Simple Focus LLC d/b/a Tech Squad LLC is a Colorado limited liability company whose principal place of business is located in Wheat Ridge, Colorado. Its sole members are Defendants Seis and Schaefer, and a non-party, Shad Richards.

4. Noble has alleged that each of the Defendants has engaged in various conduct in violation of Noble’s intellectual property rights in various assets it alleges it acquired from TouchStar Software Corporation (“TouchStar”), TouchStar Products, Inc. and TouchStar International Sales Ltd. (the “TouchStar IP”).

5. Defendants deny any wrongdoing relating to the TouchStar IP or otherwise. However, in an effort to facilitate narrowing issues in dispute and to possibly facilitate an early settlement and dismissal of this matter, the Defendants have agreed to the permanent injunctive relief set forth herein.

In light of these stipulations, the parties’ stipulation on the record at the November 10, 2009 hearing and the Joint Motion, and pursuant to Federal Rule of Civil Procedure 65, it is

**ORDERED** that the joint Motion [Docket No. 21] is GRANTED. From and after the date of this Order, Tech Squad LLC, Simple Focus LLC d/b/a Tech Squad LLC, Schaefer and Seis, and their respective officers, agents, servants, employees and attorneys, are prohibited from knowingly taking any action of any character or nature

having the purpose or effect of disclosing, disseminating or in any manner utilizing Noble's confidential, proprietary and/or trade secret information. Without limiting the foregoing, Tech Squad LLC, Simple Focus LLC d/b/a Tech Squad LLC, Schaefer and Seis are prohibited from instructing or advising any third party concerning how to violate Noble's licensing agreements and/or how to override licensing restrictions contained in Noble's software.

DATED November 18, 2009.

BY THE COURT:

s/Philip A. Brimmer  
PHILIP A. BRIMMER  
United States District Judge