

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO
Judge Raymond P. Moore**

Civil Action No. 14-cv-2325-RM-MJW

CARGILL, INCORPORATED, a Delaware corporation,

Plaintiff,

v.

JASON KUAN

Defendant.

STIPULATED TEMPORARY RESTRAINING ORDER

The parties through between their respective counsel stipulate and agree as follows to the Temporary Restraining Order regarding Cargill's highly confidential and proprietary business information and trade secrets.

- 1) Mr. Kuan shall be immediately enjoined from disclosing, or disseminating, any Cargill highly confidential and proprietary business information and trade secrets, the contents of any documents containing such information, or any Cargill trade secret to any party, whether verbally or otherwise, specifically including JBS.
- 2) Mr. Kuan shall return all copies of Cargill highly confidential and proprietary business information and trade secrets in his possession or control and allow an analysis of his electronic devices to ensure that all

Cargill highly confidential and proprietary business information and trade secrets have been returned.

- 3) Mr. Kuan shall be immediately enjoined from using any Cargill highly confidential and proprietary business information and trade secrets, the contents of documents containing such information, and other Cargill trade secrets.
- 4) Mr. Kuan hereby stipulates to the expedited discovery requested by Cargill in Cargill's Motion for Expedited Discovery (Dkt. No. 12).

The Parties agree that the Stipulated Temporary Restraining Order will remain in effect during the pendency of this matter. In addition, at the conclusion of expedited discovery, it will be necessary to conduct a preliminary injunction hearing on the issue of whether Mr. Kuan should be restricted from involvement with JBS on matters related to the business units similar to those in which he was involved at Cargill. The parties request that a preliminary injunction hearing be set in approximately thirty (30) days.

This stipulated temporary restraining order is subject to revision at the request of Cargill should Cargill learn new information regarding the scope of Cargill highly confidential and proprietary business information and trade secrets retained by Jason Kuan.

ACCEPTED:

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**Attorneys for Plaintiff, Cargill,
Incorporated**

SO ORDERED this 26th day of August, 2014 at 9:30 a.m.

BY THE COURT:



RAYMOND P. MOORE
United States District Judge