

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOHN W. VON HOLDT, JR., JANICE
ANDERSON and PLAS-TOOL CO.,

Plaintiffs

v.

A-1 TOOL CORPORATION, TRIANGLE
TOOL CORPORATION, ALFONSO
ARCINIEGAS, GEOFFREY LUTHER and
LEROY LUTHER,

Defendants.

Case No. 04-C-4123

Judge Edmond E. Chang

**DEFENDANTS A-1 TOOL CORPORATION, GEOFFREY LUTHER AND ALFONSO
ARCINIEGAS' RENEWED MOTION FOR JUDGMENT AS A MATTER OF LAW**

Defendants A-1 Tool Corporation, Geoffrey Luther, and Alfonso Arciniegas (collectively “Defendants”), by and through their counsel, pursuant to Fed. R. Civ. Pro. 50(b) respectfully renew their motion for judgment as a matter of law with respect to Plaintiff Plas-Tool Corporation’s claims for trade secret misappropriation under the Illinois Trade Secrets Act and breach of fiduciary duty. Final judgment was entered in this matter on February 4, 2014, following a jury verdict.

Defendants respectfully request the Court find the evidence presented at trial was legally insufficient for a reasonable jury to determine that Plaintiff was entitled to trade secret protection of its customer contact information because Plaintiff failed to take reasonable measures under the circumstances to protect the secrecy or confidentiality of that information. As such, Defendants respectfully request the Court enter judgment in favor of Defendants as a matter of law on Plaintiff’s claim for trade secret misappropriation.

