IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF LOUISIANA

BATON ROUGE SIGN & GRAPHICS, LLC AND JEREMIAH HALFORD)	
Plaintiffs,)	Civil Action No. 21-cv-00407-JWD-SDJ
v.)	
RYAN WILKINS,	
Defendant.	

CONSENT PERMANENT RESTRAINING ORDER

Considering the Joint Motion for Entry of a Consent Permanent Restraining Order filed by Plaintiffs, Baton Rouge Sign & Graphics, LLC ("BR Sign") and Jeremiah "Jeremy" Halford (collectively "Plaintiffs") and Defendant, Ryan Wilkins ("Wilkins") and the Parties agreed request for the entry by the Court of the following Consent Permanent Restraining Order:

THEREFORE, IT IS ORDERED that for the purposes of this Consent Permanent Restraining Order, BR Sign's "Confidential and Proprietary Information" is defined as records or materials in any form (including records, materials, or data compilations electronically, digitally, and/or physically transmitted or stored), which BR Sign kept confidential or otherwise took steps to protect from disclosure outside of its operations, that relate to BR Sign's business and clients, and their related services and products, including but not limited to: business plans and strategies; business acquisitions, mergers, and sales; business processes; research and development; training

and other operational methods and techniques; quality assurance procedures and standards; manuals, policies, and procedures; business records and files; business proposals, drawings, charts, and graphs; client lists; client information; client source lists; purchasing methods; pricing; distribution and selling plans and activities; consultants' reports; product information; marketing and other technical data and studies; employment and other personnel data; financial plans and strategies; financial reports and analyses; profits and losses; budgets; projections; cost analyses; price lists; formulae and analyses; proprietary computer software and data; internal correspondence, notes, and memoranda relating to any of the foregoing; and any copies, summaries, images or backups of any of the foregoing.

IT IS FURTHER ORDERED that:

- 1. Wilkins and all persons and entities acting in concert with him are permanently restrained, enjoined, and prohibited from using, or permitting use of, for his/their benefit or the benefit of third parties, BR Sign's trade secrets or other Confidential and Proprietary Information;
- 2. Wilkins and all persons and entities acting in concert with him are permanently restrained, enjoined, and prohibited from divulging, revealing, discussing, publishing, disseminating, or communicating BR Sign's trade secrets or other Confidential and Proprietary Information;
- 3. Wilkins and all persons and entities acting in concert with him are permanently restrained, enjoined, and prohibited from continuing to possess any property,

records, materials, and information belonging to BR Sign including BR Sign's trade secrets or other Confidential and Proprietary Information;

- a. In order to comply, Wilkins and all persons and entities acting in concert with him have diligently searched for and returned to BR Sign or its counsel any of BR Sign's property, records, materials, or data in whatever form (whether original, copied, computerized, electronically stored, or handwritten);
- b. In order to comply, Wilkins has provided all of his devices for forensic and permanent deletion, at his cost, of all property, records, materials, and information that he took from BR Sign including BR Sign's trade secrets or other Confidential and Proprietary Information, which forensic deletion shall be completed within three weeks of the entry of this Permanent Restraining Order and a certificate of deletion provided to counsel for Plaintiffs;
- 4. Wilkins is permanently restrained, enjoined, and prohibited from making false factual statements whether written or oral to BR Sign's customers or other third parties that are defamatory about Jeremy Halford, BR Sign, and BR Sign's products, services, management, and business practices;
- 5. Wilkins and all persons and entities acting in concert with him are permanently restrained, enjoined, and prohibited from gaining unauthorized access to BR Sign's

secured computer systems, including its business Google account, its shared cloudbased data storage, and any of BR Sign's corporate email accounts; and,

6. Wilkins is restrained, enjoined, and prohibited from soliciting, contacting for a business purpose, and/or doing business with any BR Sign customer identified in the listing attached hereto as "BRSign Customer List" for a period of 365 days from the day this Consent Permanent Restraining Order is executed and entered herein by the Court.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that this Consent Permanent Restraining Order shall remain in full force and effect unless altered by Court order.

SIGNED in Baton Rouge, Louisiana, on this <u>29th</u> day of <u>November</u>, 2021.

UNITED STATES DISTRICT JUDGE

Respectfully submitted,

BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ, PC

/s/Elizabeth A. Liner

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Counsel for Baton Rouge Sign & Graphics, LLC and Jeremiah Halford

-and-

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zackw@rhorerlaw.com

Counsel for Ryan Wilkins

Attachment to Consent Permanent Restraining Order

BRSign Customer List

1 1st Heritage Credit 2 365 Enterprises - Street Kings 3 629 Men's Grooming 4 7732 Goodwood Office Building 5 9round 6 AAA Insurance Travel 7 Abbott Image Solutions 8 Academy 9 Acadiana Center for Natural Health 10 Acadiana Pediatric Dentistry 11 Accent Vision Care 12 Acme Refrigeration 13 Affordable Pharmacy 14 AGI 15 AIPD 16 AJ Dorhman 17 All Pro Mobile Detail 18 All Truck Equipment 19 Alliance Source Testing 20 Allied Sales & Service	
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14 AGI 15 AIPD 16 AJ Dorhman 17 All Pro Mobile Detail 18 All Truck Equipment 19 Alliance Source Testing	
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19 Alliance Source Testing	
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20 Allied Sales & Service	
21 Allstar Affordable Autos	
22 Alpha Customs	
23 Alpha Kappa Alpha Sorority	
24 Altered Salon	
25 Amazing Chi	
26 Ameri-Air, LLC	
27 American Cash Advance	
28 American Heart Association	
29 AMG	
30 Anchor Sign, Inc.	
31 Anna M Jones	
32 Another Broken Egg Café	

33	Anytime Fitness
34	Apollo Behavioral Health
35	Arlington Cottages & Townhomes
36	Ascension Community
37	Ascension Medical Group (AGI)
38	Asian Seafood House
39	Association 1669 Lobdell
40	Atlas Dermatology
41	Audibel
42	Aurora 225
43	Austin Industrial
44	Autozone
45	Axis Realty Group
46	Bain Amour
47	Barberia Jose
48	Barriere Construction
49	Bart Bernard
50	Baton Rouge Men's Clin <u>ic</u>
<u>51</u>	Baton Rouge Title Company
52	Bayou Boyz
53	Bayou Oaks
54	Bayou Terrace
55	Bayou Trends
56	BBP
57	Beach Bums
58	Beausoleil Coastal Cuisine
59	BellaCosa
60	Bell's Barber Shop
61	Benjamin Moore
62	Bill Hood Nissan
63	Bill Moore & Associates

64	Black Diamond Express Car Wash
65	Blaine M
66	Blaze Pizza, New Orleans
67	Bluebonnet Parc
68	Bocage Animal Hospital
69	Bofinger Tree Service
70	Boh Bros
71	Bouree Restaurant
72	Bourree
73	BRCC
74	Brightway Insurance
75	Britt Hill
76	Building 5 Market & Restaurant
77	Burger King
78	Burkes Outlet
79	Busy B's
80	Cajun Chiropractic and Rehab
81	Cajun Corner
82	Cajun Fast Track
83	Cajun Industries
84	Cajun Neon
85	Caliente Mexican Craving
86	Cannon Crossing
87	Capitol Spine & Rehabilitation
88	Caro Clin <u>ic</u>
89	Caroline's Cookies
90	Carwash \$5
91	Cash America Pawn
92	Cashio's Automotive
93	Cathy's Chicken, Gulf South Sign
94	CC's Coffee House
95	CCS Concrete Services
96	Cecil D. Trahan
97	CED
98	Celerity Lanier Charter School

99	Central Baptist Church
100	Central Crossing
101	Central Pharmacy
102	Chabert Insurance
103	Champion Tire & Brake
104	Charles C. Manuel, General Dentistry
105	Charlie's Seafood Restaurant
106	Chateau Living Center
107	Chesterton's Fine Cigars
108	Chill House
109	Chimizone
110	China Bear
111	Choice Title
112	Chris's Specialty Foods
113	Christian Family Worship
114	Christus
115	Chronic Disease Solutions
116	Cintas
117	Citizens Bank
118	City Cafe
119	City Heights
120	City Pork
121	Civil Axe Throwing
122	Classy Nails
123	Clearview Glass Solutions
124	CLH Builders
125	Climastor
126	CMC Corporate Solutions
127	Co Automotive
128	Coastal Phoenix Investments
129	Coastal Processing, LLC
130	Coca Cola Bottling Company United,
	Inc.
131	Coconut Willy's
132	Coliseum Center

133	Collaborative Minds
134	College at Northgate
135	Colonial Oaks
136	Comet Cleaners
137	Commerce Group
138	Community 1st Directional sign
139	Concord Capitol
140	Coney Island
141	Conjure Beauty Lab
142	Conn's
143	Conn's Banner
144	Conn's Home Plus
145	Convent Trace
146	Coreil Othodontics
147	Corelogix
148	Corkern Family Dental
149	Cornay Plaza
150	Corner Seafood & Wings
151	Court & Layne Boutique
152	Couyon's BBQ
153	Coves of the Highland
154	Crawish Connection
155	Crestworth Middle
156	Cricket
157	Crumbl Cookies
158	CSC Customs
159	Cullen's Babyland Playland
160	Custom House Limited
161	CVS Pharmacy
162	Cypress Gardens Plaza
163	Cypress Meadows
164	Cypress Nutrition
165	Cypress Reserve
166	D&H Investments
167	Daiquiris Supreme

168	Dalton Elementary
169	David E Stanley
170	David's Bridal
171	Davis Drive Theater
172	DCI
173	DD's Discounts
174	Dead Poet Bar
175	Degravelles & Palmintier
176	Delmont Patient Plus
177	Delta Home Center
178	Delta Media
179	Denham Patty
180	Denham Springs Dental Care
181	Department of Corrections
182	DGS Retail, Inc.
183	Digital Display Services
184	Dirty Dog Nutrition
185	Doggett Crane Services
186	Doggett Machinery Services
187	Dollar Tree
188	Donaldson Chapel Baptist Church
189	Doug Ashy Building Materials
190	Dr Raborn 3D tooth
191	Dr. Patrick Briese
192	Draft Picks
193	Drug Screening Xpress
194	DSLD
195	Dudley Debosier
196	Dupont Loans
197	Dynamic Health
198	EBRSO
199	Ecogenesis LLC
200	Edible Arrangements
201	Element Baton Rouge
202	Elite Power Sports

203	Elite Wellhead Solutions
204	Elle Boutique
205	Emerald Palace
206	Encounter Church
207	Enterprise Signs
208	Epic Piping
209	Escape Room
210	Essential Mortgage Company
211	Excel Software Professionals
212	Exxon Mobile Pipeline
213	Eye Wander
214	EZ Lock
215	Facilities Maintenance Management
216	Fairlane Farms
217	Fairmont Sign Company
218	Farrell Calhoun
219	Federal Heath
220	Fedex
221	Ferguson
222	First Lady Salon
223	First Octave Piano Studio
224	Fiser Law Firm
225	Fitness Expo
226	Fitness Intervention
227	Flips Fitness
228	Fluke's Seafood Shack
229	Flutter
230	FM Bank
231	Focal Point Eye Care
232	Forever Chic
<u>233</u>	Fox Pest Control
234	Foxglove
235	Francois Cafe & Grill
236	Frank's Restaurant
237	French Quarter Shopping Center

238	French Truck Coffee
239	Galvez Commons
240	Game Day Nutrition
241	Gamers Trinity
242	Gaurdian Care
243	Geaux Chevrolet
244	Geaux Express Auto Sales
245	Geaux Fresh
246	Gerry Lane Collision Center
247	Gilbert Dupaty Memorial Park
248	Glen Oaks Middle School
249	Go Auto Insurance
250	Go Physical Therapy
251	Go-Devil
252	Good Wolf Power Yoga
253	Grand Paradise Casino
254	Great River Industries
255	Group Industries
256	Growler USA
257	Guaranty Media
258	Guardian Care J R David Creative
259	Gulf South Orthopedics
260	Gulf South Signs
261	Gulfcoast Orthopedics
262	Gulotta's Workwear Outfitters
263	H Kyle Boutique
264	H&R Block
265	Half Time Tire & Oil
266	Hampton Collision
267	Harvest Manor
268	Hazel & Bliss Boutique
269	Hazel & Blues
270	HDC & Associates
271	Healing Place Church
272	Healthy Smiles

273	Healthy U
274	Heirloom Channel letters
275	Heleauxs Grocery
276	Helix Legal Academy
277	Hematology Oncology Clinic
<u>278</u>	Heritage Healthcare of Hammond
279	Herring Stone's
280	Highway Fried Chicken
281	Hoffman/Miller Advertising
282	Home Cut Donuts
283	Hometown Lenders
284	Hospitality America
285	Hugg & Hall
286	Hwy 30 Multi Tenant Sign
287	Hyoco Distribution
288	ID & Associates
289	Identiti Resources
290	ILoveKickboxing
291	IMB Rehab Center
292	Impulsive Delights
293	In Loving Arms
294	Indigo Art Studio
295	Innophos, Inc
296	Innovative Business Suites
297	International Sign Association
298	Interntional Truck Sales
299	Ion Alkaline Water
300	Iphone
301	Isabella Lakes
302	iSIGNS, Inc.
303	Isla & Ivy Boutique
304	Island Trace
305	Jack Gremillion
306	J'aime Le Cafe
307	Jarreau's Cajun Specialties

308	Jazzercise
309	Jed's Local
310	Jefferson Healthcare
311	Jefferson Plaza
312	Jett Foam
313	Jim Wilson & Associates
314	JLB The Farm
<u>315</u>	Joan Landry
316	Joe's Pizza
317	Joey Malone
318	John Thibodeaux
319	Jolie Pearl
320	JPHOA
321	Karats Jewelry
322	Karats Jewelry
323	Kendra L. Harnett Insurance Agency
324	Keogh Cox
325	Khan Mongolian Grill
326	Kinder Morgan
327	Kingpin Performance & Offroad
328	KK's Cafe & Cakery
329	Kliebert Law
330	Knighthead Law Firm
331	Kohl's, Lafayette (AGI)
332	Kurts & Hebert
333	LA Bikini
334	LA Dermatology Associates
335	La Mange
336	La Petite Learning Center
337	La Pizza Mia
338	La Pizzeria
339	La Playa Apartments
340	LA Vape & Beyond
341	LA Vapor
342	Lagniappe Pharmacy

343	Lake After Hours
344	Lake Sherwood Club
345	Lake Urgent Care
346	Lakeshore
347	Lana Soileau & Associates
348	Lanier Elementary
349	Las Victoria's
350	Latter & Blum
351	Laundry Diva
352	Learning Adventures
353	Leauxcals Insurance
354	Legacy Plaza
355	Leroy's Tiki Bar
356	Leverage Audio
357	Liberty Mutual Insurance
358	Limcon Construction
359	Loan Depot
360	Lockhart Plaza
361	Lofton
362	Long Farm Village
363	Look at Me 4D Imaging
364	Louisiana Family Dental
365	Louisiana Home Health
366	Louisiana Poboy
367	Louisiana Wing Co.
368	Lovisa
369	Lt. Todd Bourgorne
370	Lucky Dollar Food Mart
371	lucky louie casino
372	Lux Salon
373	Lux Spa
374	Luxe Nail Bar
375	Luxury Studio
376	LVS
377	M&A Safety

378	Magnolia Brook
379	Main Squeeze Juice Co.
380	Manatee Curdo
381	Mandez's
382	Marley B's Juice Bar
383	Martial Arts
384	Martin Brower
385	Mattress Direct
386	Mattress Firm
387	Maurice Plaza
388	Maybery Law Firm
389	Maylea
390	MBS & Associates
391	Mccain Family Eyecare
392	McDonalds# 38844
393	MDVIP - Dee Dee Luke, MD
394	Meadow View
395	Mega Cab
396	Melano Brothers Fine Cigars
397	Michael's Men's Club
398	Mid Tap
399	Mike Reese
400	Mike Ward's Liberty Safes
401	Mind Body & Spirit
402	Misuraca Orthodontic
<u>403</u>	MJM Construction
404	Mod Wash
405	Model Homes
406	Monticello
407	Mooyah
408	Morgan Claire
409	Morgan Street Dance Company
410	Motel 6
411	Movie Tavern
412	Moxi Boutique

413	Mt. Calvary Baptist Church
414	Musso Plumbing
415	Musson Patout
	Nadeau
417	Nate Furlette
418	Native Wings
419	Nazaire Plaza
420	Networkz
421	New Hearts Cafe
422	New York & Co Outlet
423	Nicholson Center
424	Nissan
425	NOLA Dermatology
426	Noranda Alumina
427	Nouveau Visage
428	Oasis Christian Church
429	Oh So pretty pet boutique
430	O'Halloran's Furniture
431	Old Navy
432	Old Time Farm Supply, Inc
433	Olive Square Apartments
434	Olive Tree International Foods
435	Ollie Steele Burden Manor
436	OLOL
437	OMI Environmental & Safety Products
438	Omni Collision Center
439	Onesite Audio
440	Onsite Audio
441	Orange Beauty
442	O'reilly Auto Parts
443	Oshlan Properties
444	Our Lady of the Lake
445	OYOF Ministries
446	Pacuific Union Financial
447	Paige's Dance & Cheer Studio

448	Panaderia
449	Paperless Environments
450	Paradise Inn & Suites
451	Paradise Lakes Subdivision
452	Paramont Inspections
453	Parc Lending
454	Party Time
455	Patient Plus Urgent Care
456	Patient Urgent Care Clinic
<u>457</u>	Paychex
458	PBS Industrial
459	Pearl Dental Group
460	Pelican Nutrition
461	Pennington Biomedical Center
462	Perfect Salon
463	Perfomance Institute of Acadiana
464	Perfumes 4U
465	Petroleum Service Corporation
466	Phoenix Onsite
467	Piccadilly
468	Pilates Plus
469	Pilot
470	Pine Square Apartments
471	Pizza Artista
472	Planet Fitness
473	PLantation Management Company
474	Playa Bowls
475	Pointe Coupee General Hospital
476	Pointe Coupee Police Jury
477	Pont De Mouton Plaza
478	Popeyes
479	Posh Pre-Owned
480	Pot & Paddle
481	Pour
482	PPM Contractors, Inc.

483	Prairieville Pharmacy
484	Prairieville Urgent Care
485	Presidential Kuts Cabinet sign
486	Prezidential Kutz
487	Primaterra Apartments
488	Prime
489	Prime Medic Systems
490	Prime Occupational Medicine
491	Pro Elite Boxing & MMA
492	PT Solutions
493	Public House
494	Quality Concrete
495	RAAD Climate Control
496	Raising Cane's #9 - AGI
497	Ralph Sellers
498	Ratcliff Constructions
499	Red Dot Storage
500	Red Line Nutrition
501	Redball Oxygen
502	Reece Supply
503	Reese Lane
504	Regal Nails
505	Reggie Grace
506	Reginelli's Pizzeria
507	Renewed Med Spa
508	Rent a Center
509	Resource Bank
510	Revolution Hair Salon
511	Rimtyme
512	Rise Chiropract <u>ic</u>
<u>513</u>	Rite Aid
514	River Community Church
515	River Park
516	RKM Primary Care
517	Ron Austin & Associates

518	Rooms to Go
519	Rosie Gourmet Popcorn
520	Rouj Creole
521	Rouse's
522	Royal Jewelers
523	RPS Composites
524	Ruggles Sign Company
525	Ryder Truck Rental
526	S Sherwood Square
527	Saia Auto Consultants
528	Samson Controls
529	Sasso
530	Save Mart # 4
531	Save More #4
532	Scallon Hearing Aid & Audiology
533	Scarlett Pearl
534	Scented Jewles
535	Scoreboards
536	Scott Fences
537	Seaside Health Systems
538	Sentry Defense
539	Shane Fontenot
540	Shawn's Cajun Meats
541	Shenadoah Eye Clin <u>ic</u>
<u>542</u>	Sherwood Oaks
543	Sherwood Plaza - (ECI)
544	Shipping Etc
545	Shoe Lovers
546	Siegal Select
547	Siegan Oaks Apartments
548	Siegen Calias
549	Sigma Engineeers
550	Sign Company LLC
551	Sign Crafters
552	Signature 1 Apartments

553	SignComp
554	Simon Enterprises, LLC
555	SKBAA & Turnkey Building Signage
556	Small Cakes
557	Snap Fitness
558	South Park Cleaners
559	Southdowns Village
560	Southern Family Dental
561	Southern Fasteners
562	Southern Oaks Dental Care
563	Southern Oaks Plaza
564	Southern Recycling
565	Southern Sophisticate boutique
566	Southern Style Automotive
567	Southfin Southern Poke
568	Southland Engine Co.
569	Speedy Cash
570	Spring Gardens
571	St. Anne Church
572	St. Christopher College
573	St. Nazaire
574	Star's Bakeshop
575	State Farm
<u>576</u>	Stewart Robbins
577	Stock & Carrillo Insurance
578	Stop N Go
579	Street Breads
580	Street King
581	Subway
582	Sugar Mill Storage Center
583	Sulzer
584	Sunrise Roofing & Construction ()
585	Superior Body & Bedlin
586	Superior Carriers
587	Superior Rent To Own

588	Swamp Vapor
589	Sweet Baton Rouge
590	Swoon
591	Taco Bell
592	Take 5 Oil Change
593	Tanger Outlet Mall
594	TDDC - Gastroenterology Associates
595	Teet's Food S
596	Telco
597	Tellus Self Storage
598	TELLUS STORAGE FACES
599	The Bank of Commerce
600	The Bennett Group
601	The Betty Arms
602	The Blind Tiger
603	The Blue Zoo
604	The Eatery
605	The FinishingTouch
606	The Garden of Life association
607	The Grass & Rock Shoppe
608	The Home Depot
609	The Hydration Station
610	The Natural Path
611	The Palms Apartments
612	The Phoenix At Hammond
613	The Pink Paisley
614	The Salad Spot
615	The Shades Motel
616	The Silver Sun
617	The Uniform Outlet
618	The Unitarian Church of Baton Rouge
619	The UPS Store
620	The Village at Huns Grove
621	Theriot Family Dental Care
622	Thompson Electric Sign Co.

623	Tiger Truck Stop
624	Tint Pros
625	Tobacco Stop
626	Todd Bougher
627	Tommy's Lock & Alarm
628	Tony Clayton
629	Too Saucy Pasta Bar
630	Toot Toot's Kitchen
631	Total Cell Phone
632	Touched by Te
633	Townplace
634	Tracks for Kamyrn
635	Traction Sports Complex
636	Traction Sportsplex
637	Tradesmen International
638	Trapp's
639	Tread BR
640	Trident Inn & Suites
641	Triplet's Chicken Blue Store
642	Tuff Shed
643	Turner Industries
644	Twisted Sista's Boutique
645	Ty Hingle
646	United Christian Faith Ministries
647	Uplift
648	Valuzzo Companies
649	Vantage Health Plan
650	VCG Energy
651	Verizon Wireless
652	Very Sophisticated Banner
653	VESBR
654	Viallon Drug Company
655	Village at Huns Grove
656	Vinyl & Crafts
657	VIP Surface Concept

658	Visable Graphics
659	Vivid Ink
660	Walgreens
661	Wallflower
662	Walmart
663	Water Barre
664	Waterview
665	Waterway Pediactrics
666	Wells Fargo
667	Wendy's
668	West Centro
669	Whispering Springs
670	Whitlie Jo
671	Wild Side Smoke Shop
672	Wildwood Pizza
673	Williamson Allemons Regional Eye
	Center
674	Williamson Eye Center
675	Wing Fingers
676	Wing Stop
677	Winn Dixie
678	Woerner Turf
679	Xclusive Kuts
680	Xdesigns
681	Yellow Cab
682	Yobe
683	Yoka Japanese Steakhouse
684	Youngsville Dental Care
685	Zen - Noh Grain
686	Zeus
687	Zorbas