### UNITED STATES DISTRICT COURT DISTRICT OF NEBRASKA

AmeriPride Services Inc.,

CASE NO 8:18-CV-00096

Plaintiff,

v.

Jeffrey Peterson,

Defendant.

# **AMENDED CONSENT INJUNCTION**

This matter is before the Court on the parties' Stipulated Motion for Entry of Consent Injunction (Filing 35). Upon consideration,

### IT IS HEREBY ORDERED that:

- 1. The parties' Stipulated Motion for Entry of Consent Injunction (Filing 35) is granted.
- 2. Peterson will not, for a period of one year, beginning on April 10, 2018, and ending on April 9, 2019, within the Textile Rental Business, directly or indirectly solicit, or engage in business-related contact with, (a) any customer of AmeriPride with which Peterson did business and had personal contact during the last six months of his employment with AmeriPride, or (b) any customer identified on Exhibit 1 hereto, which Peterson concedes were AmeriPride customers with which he had contact and did business with while he was an AmeriPride employee. No geographic restriction is included or necessary because of the foregoing limitation.
- 3. "Textile Rental Business" is defined as the products and services offered by AmeriPride during the last six months of Peterson's AmeriPride employment.

4. Peterson will not divulge to any person any Confidential Information, as defined

below, until such time as such Confidential Information has become public knowledge other than

as a result of a disclosure by Peterson or those acting in concert with him or on his behalf.

5. "Confidential Information" is defined as all information not generally known to

the public, in spoken, printed, electronic or any other form or medium relating directly or

indirectly to AmeriPride's customer lists, prospect lists, financial information, marketing

strategies, pricing information, business plans, training information, employment policies,

customer requirements, and any other information marked or otherwise identified or treated by

AmeriPride as "Confidential," or understood by a reasonable person to be confidential.

6. This Court shall retain continuing jurisdiction over this action for purposes of

enforcing this Consent Injunction notwithstanding the entry of any Order of Dismissal in this

case.

DATED this 24th day of April, 2018.

s/ Joseph F. Bataillon

Senior United States District Judge

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## **EXHIBIT C**

#### LIST OF AMERIPRIDE CUSTOMERS

- 1. Adult Pediatric Urology/Pacific Surgery Center
- 2. Alamo Drafthouse
- 3. Big Fred's
- 4. Charred
- 5. Creighton Prep-Compass
- 6. Dante Pizzeria
- 7. Fuzzy's Taco Shop
- 8. Growler USA
- 9. Heartland Fertility
- 10. Hickory Villa
- 11. Immanuel Retirement Community
- 12. Jake's Cigars
- 13. KB Buildings
- 14. Kolache Factory
- 15. La Casa
- 16. La Mesa
- 17. Legends Patio Bar
- 18. Lighthouse Bar and Grill
- 19. Lighthouse Pizza
- 20. Market Basket
- 21. Nebraska Spine
- 22. Ollie and Hobbes
- 23. Over Easy
- 24. Phoenix
- 25. Potbelly
- 26. Primary Care Physicians
- 27. Shadow Ridge
- 28. Sioux City Convention Center
- 29. Smitty's Garage
- 30. Southwest Lincoln Surgery Center
- 31. Swartz Deli
- 32. Tanner's
- 33. Tiburon
- 34. UNMC Pediatric Dentistry
- 35. YMCA of Greater Omaha

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