

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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THE W.W. WILLIAMS COMPANY, LLC,  
  
Plaintiff(s),  
  
v.  
  
JOSEPH REZA, an individual; and TOTAL  
CARE MAINTENANCE, LLC,  
  
Defendant(s).

Case No. 2:17-CV-1410 JCM (PAL)  
  
TEMPORARY RESTRAINING ORDER

Presently before the court is the matter of W.W. Williams Company, LLC v. Reza et al., case number 2:17-cv-01410-JCM-PAL.

Plaintiff W.W. Williams Company, LLC (“plaintiff”) has filed a motion for temporary restraining order pursuant to Federal Rule of Civil Procedure 65, the Nevada Uniform Trade Secrets Act (NRS 600.040), and the Defendant Trade Secret Act (18 U.S.C. § 1836). (ECF No. 2).

Plaintiff alleges that defendants Joseph Reza (“Reza”) and Total Care Maintenance, LLC (“TCM” and collectively, with Reza, as “defendants”) are using plaintiff’s misappropriate trade secret and confidential information to solicit plaintiff’s customers. Plaintiff further alleges that Reza is plaintiff’s former employee and is using plaintiff’s trade secret and confidential information, soliciting plaintiff’s customers, and competing with plaintiff in breach of Reza’s proprietary information protection agreement (“agreement”) with plaintiff.

The court, having considered the complaint, memorandum of law, supporting declarations, and accompanying exhibits, hereby finds and concludes as follows:

- 1           • Plaintiff is likely to succeed in showing that defendants misappropriated and used
- 2           plaintiff's trade secret and confidential information to solicit plaintiff's customers,
- 3           and that defendants have refused to cease their conduct;
- 4           • Plaintiff is likely to succeed in showing that Reza breached the agreement in
- 5           failing to return plaintiff's confidential information and destroy any copies
- 6           thereof, and by soliciting plaintiff's customers, and has refused to cease his
- 7           conduct;
- 8           • The use of plaintiff's trade secret and confidential information will result in
- 9           immediate and irreparable injury to plaintiff in the form of loss of income, loss of
- 10          goodwill, loss of property interest in the information, and damage to plaintiff's
- 11          relationships with its customers;
- 12          • Continuing actions in breach of the agreement will result in immediate and
- 13          irreparable injury to plaintiff in the form of loss of income, loss of goodwill, loss
- 14          of property interest in plaintiff's confidential information, and damage to
- 15          plaintiff's relationships with its customers and employees.
- 16          • The harm to plaintiff in denying the requested temporary restraining order
- 17          outweighs the potential harm to the legitimate interests of defendants from
- 18          granting such an order; and
- 19          • It appears that defendants are using plaintiff's confidential information and
- 20          soliciting plaintiff's customers and will continue to carry out such acts unless
- 21          restrained by order of the court.

22          Accordingly,

23          IT IS HEREBY ORDERED that plaintiff's motion for a temporary restraining order (ECF  
24          No. 2) be, and the same hereby is, GRANTED consistent with the following.

25          IT IS FURTHER ORDERED that a preliminary injunction hearing is set for **Monday,**  
26          **June 12, 2017, at 1:00 p.m.** in courtroom 6A.

27          IT IS FURTHER ORDERED that pending the preliminary injunction hearing, defendants  
28          are temporarily restrained from the following:

- 1 (1) indirectly or directly soliciting plaintiff's customers;  
2 (2) indirectly or directly soliciting plaintiff's employees;  
3 (3) using or disclosing plaintiff's trade secret or confidential information or any  
4 reproduction or copy of the same in any format; and  
5 (4) transferring, moving, returning, destroying, reproducing, copying, or otherwise  
6 disposing of any of plaintiff's information in their possession.

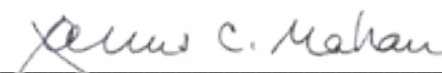
7 IT IS FURTHER ORDERED that plaintiff shall serve defendants with the summons, the  
8 complaint, the motion for preliminary injunction and the supporting declarations thereto, and the  
9 instant order on or before June 2, 2017. Proof of service shall be filed on or before June 5, 2017.

10 IT IS FURTHER ORDERED that responses, if any, to plaintiff's motion for preliminary  
11 injunction (ECF No. 9) shall be filed on or before June 5, 2017. Replies, if any, shall be filed on  
12 or before June 8, 2017.

13 IT IS FURTHER ORDERED that plaintiff shall deposit \$1,000.00 with the clerk of the  
14 court, as security for this temporary restraining order, on or before June 2, 2017.

15 IT IS FURTHER ORDERED that this temporary restraining order shall expire fourteen  
16 (14) days after entry.

17 SIGNED AND ENTERED: This 30th day of May, 2017, at 9:45 a.m.

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UNITED STATES DISTRICT JUDGE