

3. Weber Shandwick's confidential and proprietary information includes, but is not limited to, financial reports, new business pipeline reports, employee performance reports, pricing strategies, current client information, prospective client information, client pitches and statements of work and sensitive client, business, employee and related information provided, however, such confidential information shall not include information properly in the public domain (hereinafter "Confidential Information").
4. Weber Shandwick has demonstrated a likelihood of success on the merits on at least some of its claims against Defendants. The balance of equities between Weber Shandwick and Defendants favor the issuance of this Temporary Restraining Order. A Temporary Restraining Order is necessary to preserve the status quo between the parties pending a hearing on Weber Shandwick's request for Temporary Injunction.
5. Unless Defendants are immediately restrained, Weber Shandwick will be irreparably injured, imminently harmed, suffer loss and damage by:
 - a) further loss of unique and valuable rights associated with Weber Shandwick Confidential Information, proprietary trade secret information and invaluable goodwill;
 - b) further improper use and disclosure of Confidential Information;
 - c) further loss of additional key personnel;
 - d) loss of confidence and trust of its clients, loss of business goodwill, loss of business reputation, and loss of business; and
 - e) present and future economic loss, which is unascertainable at this time.
6. Unless Defendants are immediately restrained, Weber Shandwick will have no adequate remedy at law, and good cause exists for the issuance of a Temporary Restraining Order. Defendants' tortious actions have already caused Weber Shandwick to lose business and the improper disclosure of Confidential Information.
7. Defendants' agreement to the entry of injunctive relief below does not constitute an admission or agreement with these findings. Once the Order becomes effective, it shall remain in effect until February 20, 2012, unless further extended by order of this Court.

IT IS THEREFORE ORDERED that the Clerk of the Court issue a Restraining Order that the Defendants Jody Venturoni, Kenneth Luce, Maximagroup, LLC, and Hill and Knowlton, Inc. d/b/a Hill & Knowlton Strategies, (collectively the "Defendants") and their respective officers, directors, agents, servants, employees, representatives, attorneys, and all persons, firms, corporations or other entities, acting or purporting to act in active concert or participation with any of them who receive actual notice of this Order by service or otherwise, are ORDERED, ENJOINED AND/OR PREVENTED as follows:

- (i) From divulging or utilizing any Confidential Information including, but not limited to, such Confidential Information taken by Venturoni from Weber Shandwick while employed at Weber Shandwick for any purpose and including in connection with the solicitation or hiring of Weber Shandwick employees or solicitation or servicing of Weber Shandwick clients or prospects;
- (ii) To promptly, and without delay, locate and return to Weber Shandwick all electronically stored, originals, copies or other reproductions of any Confidential Information including, but not limited to, such Confidential Information taken by Venturoni from Weber Shandwick while employed at Weber Shandwick;
- (iii) From destroying, deleting, secreting, moving to another location, transferring custody or control or otherwise losing custody or control of (or encouraging or directing third parties to do the same) during the pendency of this action any documents (including, but not limited to, emails, letters, books, customer lists, prospective customer lists, customer records, invoices, statements, files, etc.) that relate to the business of Weber Shandwick, the current, prospective or former clients of Weber Shandwick, current or former employees of Weber Shandwick or any communications with Weber Shandwick employees or clients, or any other documents relevant to this lawsuit except for the return of materials to Weber Shandwick's counsel in compliance with this Order.

BOND

IT IS FURTHER ORDERED that the Court Clerk, upon the filing of a bond in the amount of \$1,000.00 (or cash deposit in lieu thereof) and on approving the same according to law, shall issue a Temporary Restraining Order in conformity with the law and the terms of this Order.

ORDER TO SHOW CAUSE

IT IS FURTHER ORDERED that each of the Defendants are to appear before the 298th Judicial District Court, Dallas County, Texas, on the 20th day of February, 2012, at 9:00 a.m., in the 298th Judicial District Court's courtroom located at 600 Commerce Street, 8th Floor, New Tower, in Dallas, Dallas County, Texas to show cause why a temporary injunction should not be entered against each of the Defendants.

Signed this 18th day of January, 2012, at 3:20 am./p.m.



JUDGE PRESIDING