

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA

FILED IN CLERK'S OFFICE
U.S.D.C. - Atlanta

SEP 11 2015

JAMES H. HAYDEN, Clerk
By: *[Signature]*
Deputy Clerk

EXECSUMMITS LLC,

Plaintiff,

v.

MICHAEL HEALY & KAREN
HEALY

Defendants.

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CIVIL ACTION

FILE NO. _____

1:15-CV-3199

**MOTION FOR TEMPORARY RESTRAINING ORDER AND
PRELIMINARY INJUNCTION AGAINST DEFENDANTS**

COMES NOW ExecSummits, LLC ("Plaintiff"), and respectfully moves this Court for the entry of a temporary restraining order and preliminary injunction to protect Plaintiff's trade secrets from further misappropriation by Defendants. In support of its motion, Plaintiff states as follows:

1. Plaintiff is filing herewith a Verified Complaint setting forth evidence establishing its likelihood of success in prevailing on its claims; the irreparable harm that Plaintiff will suffer if the requested injunction is not issued, which harm is greater and more irreparable than any harm that Defendants might claim from the requested injunctive relief; and the public interests to be served by the entry of the requested relief.

2. Plaintiff is submitting herewith a Memorandum of Law establishing Plaintiff's right to the requested relief. (Exhibit A).

3. Plaintiff is submitting herewith a Proposed Order granting this Motion. (Exhibit B).

WHEREFORE, for all of the reasons stated in its accompanying Memorandum Of Law, and on the basis of its Verified Complaint, Plaintiff respectfully requests that this Court issue a temporary restraining order restraining and enjoining Defendants from:

A. Conversion by means of sending Plaintiff's contracted clients communications or invoices and redirecting payments to the Defendants;

B. Violating O.C.G.A. § 10-1-760 et seq. by means of emailing or calling Plaintiff's confidential list of registrants for the purpose of redirecting them to or confirming they are registered for Defendants' events.

C. Tortious interference with business relations by means of contacting Plaintiff's clients with any communication that is defamatory toward or that makes direct or indirect mention or reference to the Plaintiff or any related parties for the malicious purpose of encouraging non-attendance at Plaintiff's events or breach of an existing contract.

Respectfully submitted this 11th day of September 2015.

MBW LAW, LLC

A handwritten signature in black ink, appearing to read "Mi Weinstein", written over a horizontal line.

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