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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF ORANGE – CENTRAL JUSTICE CENTER**
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13 BALBOA CAPITAL CORPORATION

14 Plaintiff,

15 vs.

16 REGENTS CAPITAL CORPORATION;
17 DONALD HANSEN; DENNIS ODIORNE;
KIRSTEN MERZA; CHELSEA HAINES;
18 JAVIER ENRIQUEZ; KEVIN KUTTER;
TRAVIS POWER; DOES 1 through 25,
19 inclusive,

20 Defendants.
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CASE NO. 30-2014-00705733-CU-BT-CJC

**[PROPOSED] ORDER TO SHOW
CAUSE RE PRELIMINARY
INJUNCTION**

[Code Civ. Proc. § 527 and Cal. Rules of
Court, rule 3.1150]

22 **TO DEFENDANTS**, REGENTS CAPITAL CORPORATION; DONALD HANSEN;
23 DENNIS ODIORNE; KIRSTEN MERZA; CHELSEA HAINES; JAVIER ENRIQUEZ; KEVIN
24 KUTTER; TRAVIS POWER

25 YOU AND EACH OF YOU ARE HEREBY ORDERED TO SHOW CAUSE at
26 _____ a.m./p.m. on March, _____, 2014, or as soon thereafter as the matter may be heard in
27 Department C-15 of the above-entitled court, located at 700 Civic Center Drive, Santa Ana, CA
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1 92701, why you, your agents, assigns, employees, partners and all those acting in concert with
2 you, should not be restrained and enjoined for the remainder of this litigation, from the following
3 conduct:

- 4 (1) Engaging in any solicitation of companies who submitted an application to
5 BALBOA that Defendants reviewed while at BALBOA; and,
6 (2) Using, copying, dealing with, disclosing, trading, and otherwise exploiting or
7 misappropriating BALBOA's confidential information, including but not
8 limited to BALBOA's customer list and customer files.

9 This Order shall be served upon the responding party no later than _____ a.m./p.m. on
10 _____, 20____ by means of _____.

11 Proof of Service of this Order on the adverse party shall be delivered to Department
12 _____ by ____ a.m./p.m. on _____, 20____.

13 The following briefing schedule shall apply:
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17 **IT IS SO ORDERED.**

18 Dated: March ____, 2014

19 Hon. Kirk Nakamura
20 **JUDGE OF THE SUPERIOR COURT**
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