

EXHIBIT O

Y:\Seagate 500GB Drive\Active Files\2011-0001_Seagate\KONKON Sales and Production Tools & Training

File Edit View Favorites Tools Help

Back Search Folders

Address Y:\Seagate 500GB Drive\Active Files\2011-0001_Seagate\KONKON Sales and Production Tools & Training

- PowerPoints PT 1.ppt
- 20_opert_ended_questions.pdf
- 451 Group 2010 E-discovery User Survey[1].pdf
- 2009_top_ten_fed_cases.pdf
- A dozen ways to change the game in sales.doc
- Account Strategy_Brad.xlsx
- AM Proposed Schedule.xls
- APRIL GOALS.docx
- Assessing Value in the Customer.rtf
- Bibliographic_Coding_Grade_A_V3.pdf
- Bibliographic_Coding_Grade_B_V3.pdf
- Brad's Old Territory list from Ted.xls
- Brad's Phone Blitz Call List.xls
- california_law_add_oct2009.pdf
- CAP-GOAL - FY10 v2.doc
- CLE-2010.ppt
- Competitive Strategy Document.doc
- Contacts for KON LDS Sales.doc
- Copy of 0818 new flyers.xls
- Copy of April 2010 Trials.xls
- Copy of February 2010 Trials.xls
- Copy of Fiscal 2005 (3).xls
- Copy of FY09 Master Firm List I.A..xls
- Copy of March 2010 Trials.xls
- Copy of new flyer zip - Brad Kolacinski updated.xlsx
- Copy of new flyer_added Brad Kolacinski NTr.xls
- Copy of new flyer_added Brad Kolacinski NTr.xlsx
- CSI-4W8Street-Forums.pdf
- Customer focused strategic questions.doc
- Differences between Grade A Grade B Coding .pdf
- Digital Awareness Digital Basics Session 1 V1.pptx
- Digital Awareness Intro to EDD Session 3 V1.pptx
- Digital Awareness Job Pickup Session 3 V1_Revred.pptx
- Digital Awareness Litigation Basics Session 2 V1.pptx
- Digital Awareness Partnering w Lit Mgrs Session 5 V1.pptx
- Digital Awareness Post-Processing Session 4 V1.pptx
- Managed Review Service Overview.pdf
- drslides.ppt
- Effective Presentation Checklist.doc
- Executive Cal checklist.doc
- Firm Profile Workbook Blank.xls
- Firm Profile Workbook O'Melveny Myers.xls
- Friday Morning - Territory Management Value Added Selling v5.ppt
- FTP Process Guide.doc
- Gatekeeper Strategies.doc
- Getting into Your Customers head.doc
- Handling the Loyalty Objection.doc
- Handouts.xls
- HR Sale 163 - 2010 Comp Plan for LDS Acct Mgrs.pdf
- KON Case Study.pdf
- KON Coding Sample # 2 (highlight).pdf
- KON Coding Services Nov 2010.pdf
- KON LDS Job pick up flow.doc
- KON Presents Training Launch Presentation for Sales .ppt
- KON Presents User Manual V1.doc
- KON Subpoena-OrderForm.doc
- KON Cataphora Technology Enhanced.pdf
- IVAC objection handling.doc
- Large Case Tracking.docx
- Litigation Imaging Assessment.xls
- Litigation Target List 6 10_BK.docx
- Making the Executive Connection.doc
- MAY GOALS.docx
- National Account List - Redbook 0810.pdf
- New Model Cold Call Script.doc
- New Model Cold Call Script_BK.doc
- New Model Outline.doc
- October GOALS.docx
- Partner Training Program Materials.pdf
- PowerPoints PT 2.Ep
- Pre Post Meeting Prep form.doc
- Principles of effective negotiations.doc
- PROJECT ERROR CORRECTION SHEET.docx
- QUOTAS FY10_LDS_WEST-CEN Regions Shop AM Quotas Los Angeles Final.xlsx
- Sales Letter templates.doc
- Sample # 2 (highlight)_redacted.pdf
- Sample Box log.xls
- Solution Point Notes.doc
- SPIN SELLING Chapters 3-4 Outline for Sales Mgt.doc
- Strategic Appointment Checklist.doc
- Strategic closing approach.doc
- Strategic e-Mail - Congratulations.doc
- Strategic e-Mail - Generic.doc
- Strategic e-Mail - Tied to Company Values - Construction Co.doc
- Strategic e-Mail - Tied to Company Values - Financial.doc
- Subpoena_fis_with Exhibits.doc
- Techniques for handling fear.doc
- Ted Call List.xlsx
- Telephone Approach Sales Call worksheet.doc
- Ten approaches to Price Objections.doc
- thank you template.doc
- Top Questions to Ask When Taking Instructions for KON Jobs.c
- Training Needs Assessment v2_Brad Kolacinski.xls
- Trial Dates Scheduled for the next 6 months 3,10,10.xls
- Types of Fear.doc
- Value Statement and Objection Handling tool.xls
- Volume I Fundamentals Part One v5.pdf
- Volume I Fundamentals Part Two v5.pdf
- Volume I Training Schedule Checklist v5 December Class 2009.xls
- Volume II Sales School v5.pdf
- Volume III 40-50K Plan PG v4.pdf
- Volume IV Digital Training v5.pdf
- Wed - Thur Morning - New Model v5.ppt
- West Region PM Biographies.doc

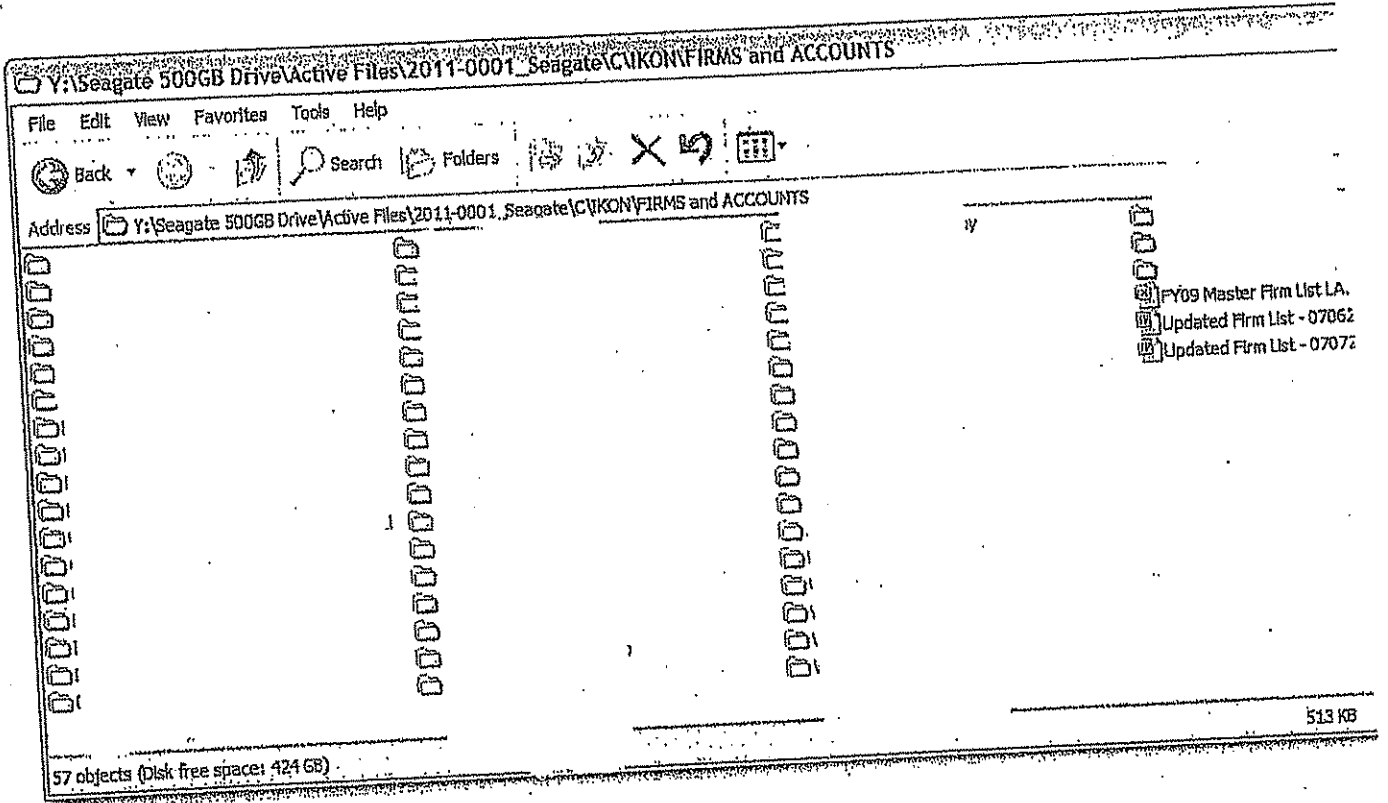
108 objects (Disk free space: 424 GB)

23.7 MB My Computer

REDACTED

EXHIBIT 0

EXHIBIT P



REDACTED

EXHIBIT P

EXHIBIT Q

Dec 14 10 06:16p

Myriad Litigation S.

12134883334

p.1



To: Lawrence H. Pockers, Esq. **From:** Stephen K. Lubega, Esq.

Fax: (215) 689-3761 **Pages:** 3, including cover

Phone: **Date:** December 14, 2010

Re: Myriad adv. IKON **cc:**

Urgent For Review Please Comment Please Reply Please Recycle

• Comments: Please see attached.

640 South Olive Street • Los Angeles, CA 90014-3633
Tel: 213.488.3332 • Fax: 213.488.3334

EXHIBIT Q

000084

Dec 14 10 06:16p

Myriad Litigation S.

12134883334

p.2



VIA FACSIMILE AND US MAIL

Lawrence H. Pockers, Esq.
DUANE MORRIS LLP
30 South 17th Street,
Philadelphia, PA 19103-4196

Re: IKON Business Solutions, Inc.'s Notice of Potential Legal Action to Myriad Litigation Solutions, LLC

Dear Mr. Pockers:

I am Company Counsel to Myriad Litigation Solutions, LLC ("Myriad"). I am responding to your letters of December 7, 2010 to Derek Bland, CEO of Myriad and to Tai Hornbeck and Brad Kolacinski, who are employees of Myriad.

It appears that in making the factual allegations it makes, your client, IKON Business Solutions, Inc. ("IKON"), is misinformed, which apparently is the reason for the erroneous conclusions that Myriad is in possession of allegedly misappropriated trade secret/confidential information belonging to IKON. I have been instructed to inform you that Myriad is not in possession of any confidential information or trade secrets of IKON. While Mr. Kolacinski has represented to Myriad that he may be in a position to persuade certain clients or customers of IKON to utilize Myriad's services, it is not true that Mr. Kolacinski has provided Myriad with any IKON trade secret information concerning IKON customers.

As I am certain you appreciate, California law liberally permits free and unfettered mobility of employees to pursue their livelihoods amongst competing employers. In that respect, former employees are free to utilize their own body of experience gained in the industry to solicit business from their former employers' customers. The California Supreme Court case of *Edwards v. Arthur Andersen, LLP* (2008) 44 Cal. 4th 937, and its progeny, stand for the proposition that a former employee may not be enjoined from soliciting the former employer's customers as long as he or she does not use misappropriated trade secrets and confidential information. Please be assured that Myriad has not received any IKON trade secret information. To the extent that Myriad was provided with any information by Mr. Hornbeck or Mr. Kolacinski from their personal files, Myriad discarded any such information as not pertinent to Myriad's decision to employ them. They were certainly never asked by Myriad to provide Myriad with any alleged confidential customer lists or other IKON information. Nor has Myriad been given any IKON pricing information or revenue schedules as

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Dec 14 10 06:17p

Myriad Litigation S.

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p.3

you allege. Mr. Kolacinski and Mr. Hornbeck have informed Myriad that they copied their own personal folders which contained information personally compiled based on their own work experience at IKON, but that information was not compiled from any IKON database. The information apparently is simply based on personal experience and information received during the course of their employment and they were not informed that this information could not be maintained by them in their personal folders.

Further, please be informed that in addition to not possessing any confidential or trade secret information of IKON, Myriad also was not given any flash drives, which you allege were previously plugged into IKON computers. Accordingly, Myriad is not in a position to comply with your Demand No. 1 to Myriad. In addition, Myriad denies that it has violated California law in any respect as alleged in your letter. Accordingly, Myriad will also not agree to your Demand No.'s 2, 3 and 4. To the extent that Myriad solicits any customers that are also presently customers of IKON, such solicitation is entirely within the bounds of California law since Myriad has not misappropriated any confidential or trade secret information from IKON. Accordingly, your Demand No. 5 is not pertinent and Myriad will not comply with it.

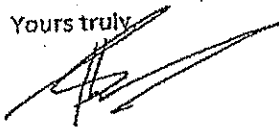
Finally, Myriad cannot condition its employment of prospective employees on demands by their former employer that they keep purported promises not to breach agreements of which Myriad was not a party. This is especially so where, as in this case, it appears that provisions within those agreements may not even be enforceable under California law. Therefore, for all of the reasons given above, Myriad will not execute the affidavit you provided with your letter.

The positions I have stated above, apply equally to Myriad's employees. These employees will return any information they each copied on flash drives as long as IKON agrees to return to these employees their personal information contained on those drives after IKON has verified that the information contained thereon was indeed their personal information and not IKON trade secrets or confidential information copied from IKON databases. To the extent necessary, these flash drives can be secured until the logistics are worked out.

Regarding Demand No. 2, Myriad confirms that Myriad does not possess any IKON confidential information. Demands No.'s 3, 4, 5 are unacceptable as they unreasonably restrict these employees' rights under California law. Demand No. 6 is not pertinent because the employees contend that they did not misappropriate any trade secret or confidential information belonging to IKON. Lastly, Mr. Kolacinski and Mr. Hornbeck will not execute the requested affidavits because those affidavits clearly violate their rights under California law.

I am hopeful that the above clarification will put this matter to rest. If you still have issues or concerns, please feel free to give me a call at (213) 488-3332.

Yours truly



Stephen Lubega

EXHIBIT R

Jan 26 11 06:13p

Myriad Litigation S.

12134883334

p.1



640 South Olive Street
Los Angeles, CA 90014-1691

Phone 213.488.3332
Fax 213.488.3334
dadams@myriadlit.com

Facsimile Transmittal

To: Lawrence H. Pockers, Esq. **Fax:** (215) 979-1020

From: Dawn Adams **Date:** 01/26/2011

Re: Myriad Adv. IKON **Pages:** (3) Pages including Cover Sheet

CC:

Urgent For Review Please Comment Please Reply Please Recycle

Message:

Please see attached letter.

EXHIBIT R

Jan 26 11 06:13p

Myriad Litigation S.

12134883334

p.2



VIA FACSIMILE AND US MAIL

January 26, 2011

Lawrence H. Pockers, Esq.
DUANE MORRIS LLP
30 South 17th Street,
Philadelphia, PA 19103-4196

Re: IKON Business Solutions, Inc./Myriad Litigation Solutions, LLC

Dear Mr. Pockers:

I am responding to your letter of January 19, 2011. First, while it might appear to be a mere quibble, I take issue with your characterization in your January 19 letter attributed to me as a representation I made to IKON. I never represented to IKON that "current Myriad employees" Brad Kolacinski and Tai Hornbeck used the subject flash drives "to copy information from their [IKON] issued laptops prior to their coordinated resignations of employment from IKON." That characterization is in fact yours and IKON's, not mine. I, on behalf of Myriad, was merely responding to your accusations, not acknowledging that your version of the alleged events is accurate.

As we promised to do, Myriad collected the subject hard drives from Messrs. Kolacinski and Hornbeck to aid you in ascertaining the information contained on those drives. I was informed by those employees the drives contained information originally in their personal folders on their laptops, which was their information developed or retained by them during the course of their employment. I was further informed that none of the information was "secret" in the sense that it had been copied from password protected or secured sources. Much of it was allegedly in fact compiled by the employees themselves, and not by IKON. If IKON now contends that this information in fact constitutes "trade secrets," it may very well be that IKON failed to take the steps necessary to ensure the secrecy and confidentiality of the information. As I understand California law, employees cannot be found to have "misappropriated" something that they did not wrongfully take. Further, in order to have been "secret," the information would have to be of the type not generally known or widely disseminated. Cases that have found a trade secret have generally also found that the employer took reasonable efforts to secure and secret the information. Further, the information was not generally known to other people who could also derive economic value from the information.

After reviewing your letter and proposed consent order, Myriad and its employees decline to execute such an order. As I understand it, the pricing information that you point to was actually created

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Jan 26 11 06:14p

Myriad Litigation S.

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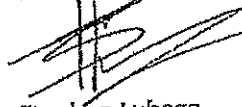
p.3

by Kolacinski and Hornbeck from their general knowledge and experience and does not reflect any "secret" information given them by IKON. Moreover, pricing information is not unique in this industry and can readily be ascertained from clients and customers themselves. I am also informed that the "RAP reports" are weekly reports which the employees use to determine, with a manager, what clients they will be targeting, the employees' pipeline, and their projected sales in relation to quotas. I understand that the information was also widely disseminated or otherwise generally available. Therefore, it is doubtful that IKON can show that these reports were either trade secrets or that they derive any independent economic value. I am also informed that the "customer files" to which you refer are simply files that were compiled by the employee himself and the names of the clients and contacts therein were developed by that very employee. Knowledge of customer identity is rarely found to be appropriate for secrecy protection in California. Finally, you claim that Kolacinski and Hornbeck copied documents containing IKON's "competitive strategy," "call scripts for finalizing sales calls," "IKON's training and orientation manual," and "Talking Points" used to demonstrate to customers the value added by using IKON. Again, it is doubtful that these documents, even if copied by the employees, derive any independent economic value. Further, I understand that a training and orientation manual is given to every employee upon hire and there was never any effort to secret any information contained therein.

More to the point, however, is the fact that none of the documents to which you refer were ever given to or possessed by Myriad. Therefore, it makes no sense for Myriad to consider executing such an overly-broad injunctive order as the one you propose or any "consent" order at all. Myriad has committed no wrong subject either to injunction or a suit in damages. Further, there are considerable substantive and procedural infirmities in your proposed order, not the least of which is that there is not even the slightest effort to define or particularize the alleged "trade secrets" that have been purportedly misappropriated - which IKON would be required to do prior to litigating its purported claims. In other words, what IKON proposes by "consent" is something I believe IKON would be unlikely to attain by litigation. IKON can neither show that Myriad has misappropriated anything nor that IKON has been damaged by these employees' use of any of the allegedly misappropriated information.

In the circumstances, and in the interests of both sides not expending additional unnecessary resources on this matter, I propose that IKON let the matter rest as is.

Yours truly,



Stephen Lubega

EXHIBIT S

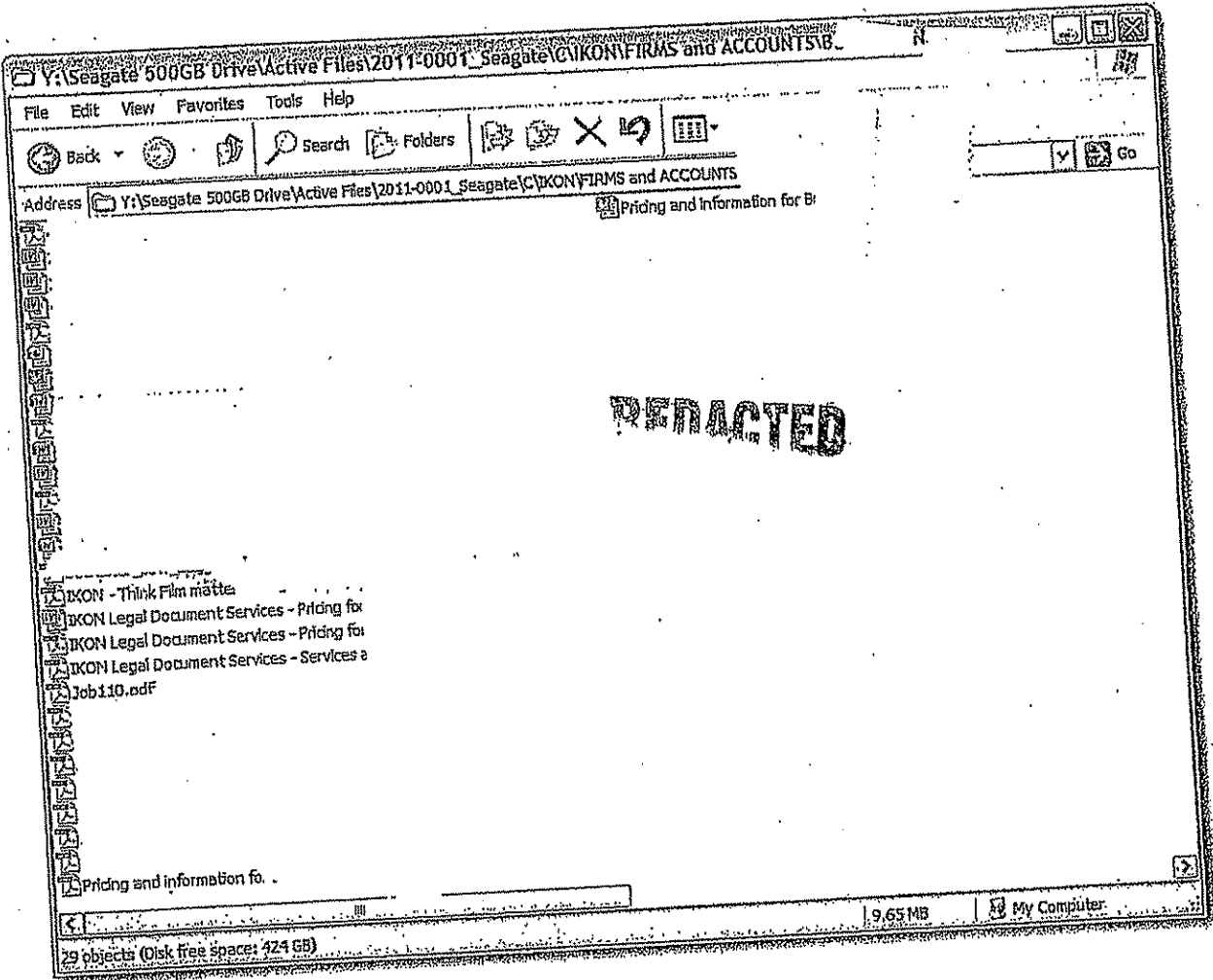


EXHIBIT S

EXHIBIT T

IKON | Litovation Solutions SM

Where Litigation Meets Innovation

Confidential Pricing for B. N

REDACTED

PRODUCT DESCRIPTION	1 to 5	6 to 10	11 to 20	21 to 50	50 +
Onsite forensic imaging Laptop/workstation Servers inc. all internal drives Thumb drive, flash drive External hard drive Targeted collection	\$ \$ \$ \$ \$	\$ \$ \$ \$ \$	\$ \$1 \$ \$ \$	\$ \$ \$ \$ \$	\$ \$ \$ \$ \$
Contingent upon location, travel fees may apply Forensic remote collection tool full image laptop/workstation* full image server inc. all drives** remote targeted collection**	\$ \$ \$ \$	\$ \$ \$ \$	\$ \$ \$ \$	\$ \$ \$ \$	\$ \$ \$ \$
PRODUCT DESCRIPTION	10 to 20	21 to 100	101 to 250	250 and up	
Forensic data filtering De-Nist -removal of known application files File Signature Analysis De-Duplication Extraction of User Created Files Searching/Filtering based on volume after services above if applicable inc. wildcard, boolean, keyphrases, date, proximity All of the above	\$ \$ \$ \$ \$	\$ \$ \$ \$ \$	\$ \$ \$ \$ \$	\$ \$ \$ \$ \$	\$ \$ \$ \$ \$
PRODUCT DESCRIPTION	1 to 5	6 to 10	11 to 20	20 to 50	50 and up
e-Discovery processing Native with metadata and text includes optional filtering Tiff with native, metadata, text, includes optional filtering WEB Based Review Tools (E-Review, Catalyst, other) *cost of hard drive and shipping not included; **remote server requires evaluation	\$ \$	\$ \$	\$ \$	\$ \$	\$ \$

EXHIBIT **T**

EXHIBIT U

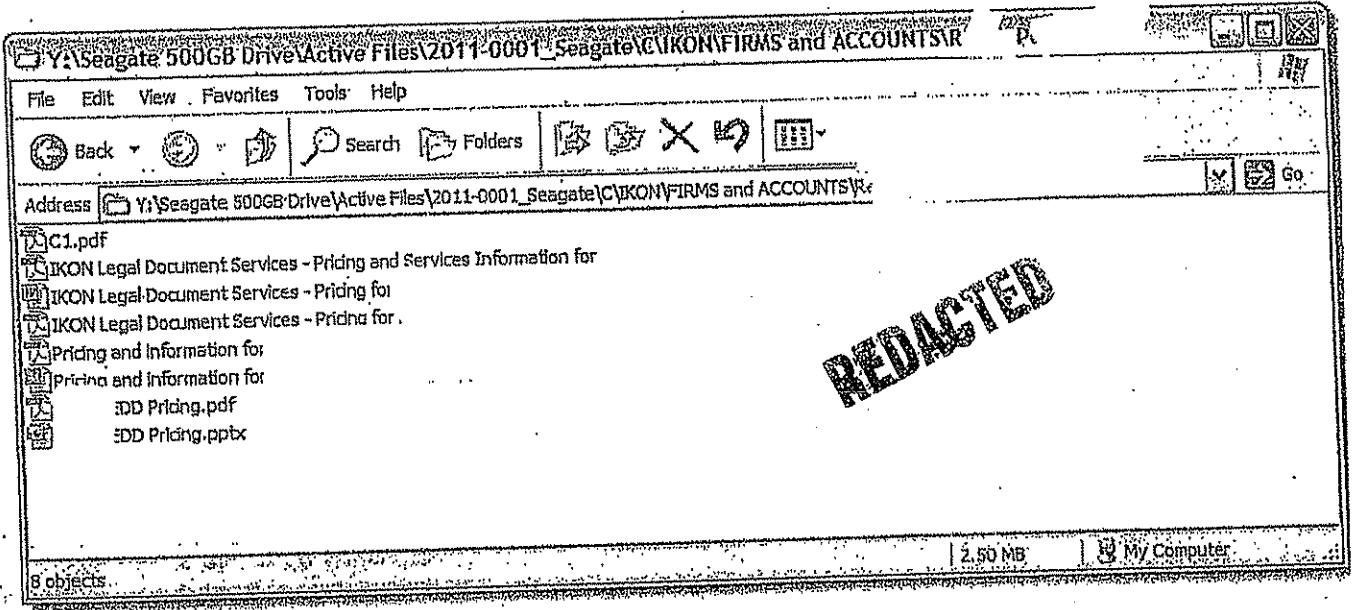


EXHIBIT U

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge S. James Otero and the assigned discovery Magistrate Judge is Alicia G. Rosenberg.

The case number on all documents filed with the Court should read as follows:

CV11- 1382 SJO (AGR~~x~~)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

=====

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

Western Division
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

Southern Division
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

Eastern Division
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

Yvette D. Roland (SBN 120311)
DUANE MORRIS LLP
865 So. Figueroa Street, Suite 3100
Los Angeles, California 90017-5450
Telephone: 213.689.7400
Facsimile: 213.689.7401

COPY

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

IKON OFFICE SOLUTIONS, INC.,

PLAINTIFF(S)

v.

JOHN BRAD KOLACINSKI, ROBERT TAI
HORNBECK, and MYRIAD LITIGATION
SOLUTIONS, LLC,

DEFENDANT(S).

CASE NUMBER

CV11-01382-SJO(AGRx)

SUMMONS

TO: DEFENDANT(S): JOHN BRAD KOLACINSKI, ROBERT TAI HORNBECK, and MYRIAD LITIGATION SOLUTIONS, LLC.

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached complaint _____ amended complaint counterclaim cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Yvette D. Roland, whose address is 865 South Figueroa Street, Suite 3100, Los Angeles, CA 90017-5450. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

FEB 14 2011

Dated: _____

Clerk, U.S. District Court

JULIE PRADO

SEAL

By: _____

Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

(a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) IKON OFFICE SOLUTIONS, INC.	DEFENDANTS JOHN BRAD KOLACINSKI, ROBERT TAI HORNBECK, and MYRIAD LITIGATINO SOLUTIONS, LLC
----------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------

b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) Yvette D. Roland (SBN120311) DUANE MORRIS LLP 865 So. Figueroa Street, Suite 3100 Los Angeles, CA 90017-5450 Tel: 213.689.7400	Attorneys (If Known)
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------

BASIS OF JURISDICTION (Place an X in one box only.) 1 U.S. Government Plaintiff <input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) 2 U.S. Government Defendant <input checked="" type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border-collapse: collapse;"> <tr> <td style="width:30%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> <td style="width:40%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> </tr> <tr> <td>Citizen of This State</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input checked="" type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business in this State</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input checked="" type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input checked="" type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td style="text-align: center;"><input checked="" type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input checked="" type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input checked="" type="checkbox"/> 4	Citizen of Another State	<input checked="" type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input checked="" type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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V. ORIGIN (Place an X in one box only.)

1 Original Proceeding
 2 Removed from State Court
 3 Remanded from Appellate Court
 4 Reinstated or Reopened
 5 Transferred from another district (specify):
 6 Multi-District Litigation
 7 Appeal to District Judge from Magistrate Judge

REQUESTED IN COMPLAINT: JURY DEMAND: Yes No (Check 'Yes' only if demanded in complaint.)

ASS ACTION under F.R.C.P. 23: Yes No **MONEY DEMANDED IN COMPLAINT: \$**

I. CAUSE OF ACTION (Cite the U. S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
 8 U.S.C. § 1332; misappropriation of trade secrets Cal. Civ. Code § 3426 et seq.; Cal. Bus. Code § 17200 et seq.

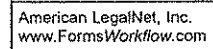
II. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES	CONTRACT	TORTS PERSONAL INJURY	TORTS PERSONAL PROPERTY	PRISONER PETITIONS	LABOR
<input type="checkbox"/> 400 State Reapportionment	<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus	<input type="checkbox"/> 710 Fair Labor Standards Act
<input type="checkbox"/> 410 Antitrust	<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 530 General	<input type="checkbox"/> 720 Labor/Mgmt. Relations
<input type="checkbox"/> 430 Banks and Banking	<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act
<input type="checkbox"/> 450 Commerce/ICC Rates/etc.	<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 330 Fed. Employers' Liability	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 540 Mandamus/Other	<input type="checkbox"/> 740 Railway Labor Act
<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 340 Marine	BANKRUPTCY	<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 790 Other Labor Litigation
<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations	<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 22 Appeal 28 USC 158	<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 791 Empl. Ret. Inc. Security Act
<input type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans)	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 423 Withdrawal 28 USC 157	FORFEITURE/PENALTY	PROPERTY RIGHTS
<input type="checkbox"/> 490 Cable/Sat TV	<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	CIVIL RIGHTS	<input type="checkbox"/> 610 Agriculture	<input type="checkbox"/> 820 Copyrights
<input type="checkbox"/> 810 Selective Service	<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 620 Other Food & Drug	<input type="checkbox"/> 830 Patent
<input type="checkbox"/> 850 Securities/Commodities/Exchange	<input checked="" type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 362 Personal Injury-Med Malpractice	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 840 Trademark
<input type="checkbox"/> 875 Customer Challenge 12 USC 3410	<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 365 Personal Injury-Product Liability	<input type="checkbox"/> 443 Housing/Accommodations	<input type="checkbox"/> 630 Liquor Laws	SOCIAL SECURITY
<input type="checkbox"/> 890 Other Statutory Actions	<input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 444 Welfare	<input type="checkbox"/> 640 R.R. & Truck	<input type="checkbox"/> 61 HIA(1395ff)
<input type="checkbox"/> 891 Agricultural Act	REAL PROPERTY	IMMIGRATION	<input type="checkbox"/> 445 American with Disabilities - Employment	<input type="checkbox"/> 650 Airline Regs	<input type="checkbox"/> 862 Black Lung (923) 405(g))
<input type="checkbox"/> 892 Economic Stabilization Act	<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 462 Naturalization Application	<input type="checkbox"/> 446 American with Disabilities - Other	<input type="checkbox"/> 660 Occupational Safety /Health	<input type="checkbox"/> 863 DIWC/DIWW 405(g))
<input type="checkbox"/> 893 Environmental Matters	<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 463 Habeas Corpus-Alien Detainee	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 864 SSID Title XVI
<input type="checkbox"/> 894 Energy Allocation Act	<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 465 Other Immigration			<input type="checkbox"/> 865 RSI (405(g))
<input type="checkbox"/> 895 Freedom of Info. Act	<input type="checkbox"/> 240 Torts to Land				FEDERAL TAX SUITS
<input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice	<input type="checkbox"/> 245 Tort Product Liability				<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)
<input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 290 All Other Real Property				<input type="checkbox"/> 871 IRS-Third Party 26 USC 7609

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FOR OFFICE USE ONLY: Case Number: _____

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.



VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? No Yes

If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? No Yes

If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- Check all boxes that apply) A. Arise from the same or closely related transactions, happenings, or events; or
 B. Call for determination of the same or substantially related or similar questions of law and fact; or
 C. For other reasons would entail substantial duplication of labor if heard by different judges; or
 D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

- a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named plaintiff resides.
 Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
	Ohio

- b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named defendant resides.
 Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

- c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH claim arose.
Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved.

X. SIGNATURE OF ATTORNEY (OR PRO PER):  Date February 14, 2011

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3 -1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))