

STATE OF MICHIGAN
IN THE THIRD CIRCUIT COURT

AFT Michigan

HON. BRIAN R SULLIVAN

v

Case No.: 17-014348 CZ

Project Veritas, a foreign corporation,
and Marisa L. Jorge, a/k/a Marissa Jorge

17-014348-CZ

MARK H. COUSENS (P12273)
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CATHY M. GARRETT

**EX PARTE TEMPORARY RESTRAINING ORDER
AND ORDER DIRECTING HEARING ON PLAINTIFF'S
MOTION FOR A TEMPORARY INJUNCTION**

At a session of this Court on SEPTEMBER 28, at 3:25 p.m.
before HON. BRIAN R SULLIVAN
CIRCUIT COURT JUDGE

Upon the application of Plaintiff supported by affidavits, it appears to the Court
that Defendants have secured access to private, confidential and proprietary information,
and;

It appears to the Court that the Defendants intend to publish this information for
the purpose of characterizing Plaintiff in a false light, and ^{with} for publish information
that is confidential and/or proprietary.

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It appears to the Court that giving notice to the Defendants of the pendency of this action in advance of the entry of an order prohibiting publication will give Defendants the opportunity to publish information obtained unlawfully, and;

It appears to the Court that the publication of private, confidential and proprietary information will result in an irreparable injury to Plaintiff because information released to the public cannot be recalled or the privacy of the information restored and;

It appears to the Court from specific facts shown by affidavit that immediate and irreparable injury, loss, or damage will result to the Plaintiff from the delay required to effect notice or from the risk that notice of this action will itself precipitate adverse action before an order can be issued;

Therefore it is ordered that:


1. ~~Defendant PV~~, Defendant Jorge, ^{HEV} their agents, employees and those acting in concert are enjoined and restrained from publishing, releasing to the public or otherwise disclosing ^{PRIVATE, CONFIDENTIAL AND PROPRIETARY} information pertaining to or relating to the Plaintiff/AFT Michigan, its officers, employees or affiliated location unions until the further order of the Court;
2. Defendant PV and Defendant Jorge are required to appear before this Court on Thursday the 5th day of October, 2017 at 9 AM to respond to this action.

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3. This order shall expire fourteen days following issuance unless continued by subsequent order of the Court.



CIRCUIT COURT JUDGE

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