

Form 15. Application for Temporary Restraining Order

[Caption and signature block as in Form 1]

Pursuant to Rule 65A of the Utah Rules of Civil Procedure, plaintiff moves the court for a temporary restraining order preventing defendant from continuing to use plaintiff's property, from interfering with plaintiff's business relationships, and from using any of plaintiff's trade secrets and proprietary information.

Plaintiff's application is based on the following grounds:

1. A temporary restraining order is the appropriate legal remedy to enjoin the breach of an enforceable agreement.

2. Plaintiff will suffer immediate irreparable harm unless the court issues a temporary restraining order preventing defendant from interfering with plaintiff's business and plaintiff's customer relationships.

3. Plaintiff will suffer immediate irreparable harm unless the court issues a temporary restraining order ordering defendant to restrain from disclosing, revealing, or using any of plaintiff's trade secrets or confidential information.

4. The threat of injury to plaintiff outweighs whatever damage a temporary restraining order may cause defendant.

5. Issuance of a temporary restraining order will not be adverse to the public interest.

6. There is a substantial likelihood that plaintiff will prevail on the merits of the claims, or the case presents serious issues which should be the subject of further review and litigation.

This Application is supported by a verified complaint or affidavits stating specific facts filed with the court and by an accompanying memorandum of points and authorities.