

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

PROJECT TRAVEL, LLC, A
Delaware Limited Liability Company,

Plaintiff,

v.

JASON ROWE, an individual,

Defendant.

CIVIL ACTION

Case No. 8:24-cv-02817-WFJ-LSG

CONSENT PRELIMINARY INJUNCTION

THIS MATTER comes before the Court upon Plaintiff Project Travel, LLC's Emergency Motion for a Temporary Restraining Order ("TRO") and Preliminary Injunction (Doc. 2), pursuant to Fed. R. Civ. P. 65 (the "TRO Motion"), against Defendant Jason Rowe, and Defendant Rowe's Memorandum in Opposition to the TRO Motion (Doc. 23).

On December 9, 2024, the Court issued an Order granting Plaintiff's Motion for a Temporary Restraining Order ("Order Granting TRO"). (Doc. 11).

On December 9, 2024 and in accordance with the Order Granting TRO, Plaintiff sent via email and Federal Express to Defendant's counsel a copy of (a) the Order Granting TRO, (b) the summons, (c) the Verified Complaint, (d) the TRO Motion, and (e) the notice setting a hearing on December 20, 2024.

On December 20, 2024, after being served with the Verified Complaint and TRO Motion and entering an appearance in the case, Defendant filed a Memorandum in Opposition to the Motion for Temporary Restraining Order and Preliminary Injunction.

After conferring in good faith, the parties have agreed to the entry of this Consent Preliminary Injunction resolving the TRO Motion conditioned upon the entry of this Consent Preliminary Injunction, and subject to a future determination of Defendant's defenses to the Court's exercise of personal jurisdiction and subject matter jurisdiction, and the Court having reviewed the file in this case and otherwise being fully advised in the premises for the TRO Motion, now pursuant to Federal Rule of Civil Procedure 65,

IT IS HEREBY ORDERED THAT:

1. Defendant, and any person acting in concert with him with actual notice of this Order, is prohibited from disclosing any of Plaintiff's trade secret, confidential, and/or proprietary business information, or using such information to benefit himself or any third party;

2. Defendant is prohibited from working with any customer or prospective customer (defined as a customer Project Travel had affirmatively identified as a prospective customer and begun negotiations with at any time during Mr. Rowe's employment with Project Travel) of Plaintiff about whom Defendant took any

confidential information from Plaintiff or with respect to whom Defendant has used Plaintiff's confidential information since leaving Project Travel;

3. Defendant has agreed to participate in a forensic remediation process, conducted by a Court-appointed forensic neutral and at Plaintiff's initial expense, with the final assessment of expense to be determined later, to insure that all of Plaintiff's information is returned to Plaintiff and securely removed from Defendant's possession, custody, or control and returned to Plaintiff; and

4. Defendant shall not destroy, alter, transmit or move (except by agreement of the parties or in compliance with a Court order) any documents, in whatever form, that may contain or reflect Plaintiff's trade secret or confidential information.

5. This Order fully resolves the TRO Motion and the hearing set for December 20, 2024 at 3:30 p.m. is hereby cancelled.

6. This Order shall remain in effect until further Order of this Court.

LITTLER MENDELSON P.C.

DEAN MEAD, EGERTON,
BLOODWORTH, CAPOUANO &
BOZARTH, P.A.

/s/ Tyler A. Sims

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Attorneys for Defendant

SO ORDERED this 20 day of December 2024.



U.S.D.J.