

STATE OF RHODE ISLAND  
KENT, S.C.

SUPERIOR COURT

_____	)	
BRADY SULLIVAN PROPERTIES, LLC,	)	
	)	
<i>Plaintiff,</i>	)	
v.	)	C.A. No. _____
	)	
CHRISTINA RAHN and JULIO BASABE,	)	
	)	
<i>Defendants.</i>	)	
_____	)	

**PLAINTIFF’S MOTION FOR TEMPORARY  
RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

Pursuant to Rule 65(b) of the Superior Court Rules of Civil Procedure, Plaintiff Brady Sullivan Properties, LLC (“Brady Sullivan”) moves this Court for entry of a temporary restraining order and preliminary injunction requiring Defendants Christina Rahn and Julio Basabe to immediately: (1) cease disclosing Brady Sullivan’s confidential information; (2) reveal to Plaintiff what confidential information of Plaintiff’s Defendants have disclosed; (3) identify to whom Defendants disclosed Plaintiff’s confidential information; and (4) preserve, not destroy, and return to Brady Sullivan its confidential information and property.

The grounds for this Motion are set forth in the accompanying Memorandum of Law and Complaint.

Date: March 15, 2018

RESPECTFULLY SUBMITTED,

BRADY SULLIVAN PROPERTIES LLC,

By its Attorneys,

/s/ John A. Tarantino

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William M. Dolan III [No. 4524]

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