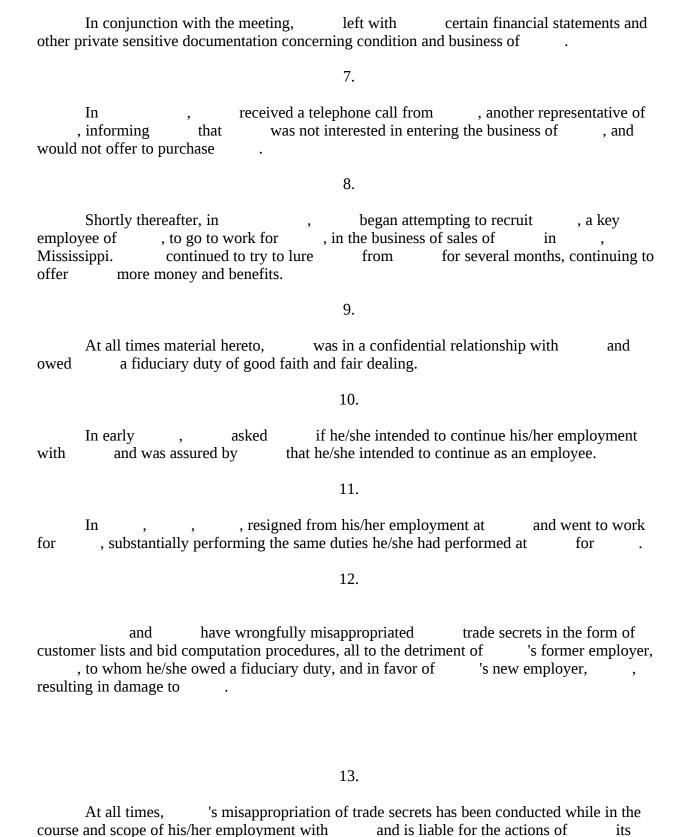
IN THE CIRCUIT COURT OF COUNTY, MISSISSIPPI

PLAINTIFF

VS.	NO.
A	AND DEFENDANTS
	COMPLAINT
, (NOW COMES , Plaintiff, (" ") and files its Complaint against Defendants, (" ") and (" ") and for cause of action would show unto the Court the ag, to-wit:
	1.
	Plaintiff, , is a corporation organized and existing pursuant to the laws of the State issippi, and having its principal place of business in County, Mississippi.
7	2. Γhe Defendants are:
principa	(a) , a non-resident corporation organized and existing pursuant to the the State of and authorized to do business in the State of Mississippi, having its l place of business in County, Mississippi, and which may be served with process ng its registered agent, ;
County,	(b) , an adult resident citizen of the Mississippi, who may be served with process at . Judicial District of .
	3.
[] Mississi	The cause of action hereinafter stated occurred and accrued in County, ppi.
	4.
	is engaged in the business of to end users of such consumer goods.
	5.
, a	In , , the President of , met with , a representative of et in , Mississippi. The meeting was conducted in order to discuss a l purchase of business by .
	6.



, upon the doctrine of respondent superior.

employee,

The customer list and bid computation methods of constitute a confidential information of as an employee and/or former employee, had a high duty not to disclose such information to others to the detriment of . , while in the course and scope of his/her employment with disclosed and utilized this confidential information to the detriment of and the benefit of , causing damage to .
15.
Due to the wrongful conduct of and , has been damaged and will continue to suffer damage to its business, in the sum of \$.
16.
The actions of in requiring the confidential financial information pertaining to the business of under the pretext of purchasing the business of , and then hiring the key employee of and inducing him/her to breach his/her fiduciary duties owed to were committed with willful and wanton disregard for the rights of , and is entitled to recover punitive damages from Defendant, , in such sum as to be established by the Court upon a trial hereof.
WHEREFORE, PREMISES CONSIDERED, , sues and demands judgment against and , jointly and severally, in the sum of \$, and punitive damages against Defendant, , in such sum as will be established by the Court upon a trial hereof, together with its costs.
Respectfully submitted,
Attorney for
Of Counsel:
Telephone: MSB # Attorney for