

STATE OF INDIANA)	IN THE HAMILTON SUPERIOR COURT
)	SS:
COUNTY OF HAMILTON)	CAUSE NO. 29D02
)	
CITY OF WESTFIELD, INDIANA,)	
)	
Plaintiff,)	
)	
vs.)	
)	
CINDY GOSSARD, in her)	
individual capacity, and JOHN DOE)	
)	
Defendants.)	

**THE CITY OF WESTFIELD, INDIANA’S
MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Rule 65 of the Indiana Rules of Trial Procedure, plaintiff the City of Westfield (the “City”) requests that, upon hearing, the Court issue a preliminary injunction that:

- (a) Orders defendant Gossard to return all City information and data she downloaded and/or obtained from the City’s computer network;
- (b) Orders defendant Gossard to identify the name, address, and contact information of defendant John Doe, Gossard’s agent who accessed and downloaded information from the City’s computer network, and to provide a copy of any contract or agreement she entered into with John Doe;
- (c) Orders defendant John Doe to immediately return all information and data he downloaded, accessed, or obtained from the City’s computer network; and

(d) Enjoins defendants from retaining, using, or disclosing any of the information or data they downloaded or obtained from the City's computer network;

In support of its motion, the City states that:

1. This motion is being filed contemporaneously with the City's filing of its complaint, which includes a request for injunctive relief. The City's complaint contains the factual allegations and legal theories that serve as the basis for this motion.

2. The City is able and willing to provide security as the Court might deem proper.

3. The City requests that this Motion be set for hearing on the Court's next available date.

Wherefore, the City requests that the Court enter a preliminary injunction against defendants and enter all other just and proper relief.

Respectfully submitted,

/s/ Blake Burgan

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