

FILED

CAUSE NO. DC-17-03046

2017 APR 10 PM 3:53

NEIGHBORHOOD CREDIT UNION,
Plaintiff,

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IN THE 95TH JUDICIAL

COUNTY CLERK
DALLAS COUNTY

v.

DISTRICT COURT OF

JOEL MATTHEW RISENHOOVER and
LINDA RESTREPO,
Defendants.

DALLAS COUNTY, TEXAS

NOTICE OF PLAINTIFF'S AMENDED MOTION FOR FILING DOCUMENTS UNDER SEAL

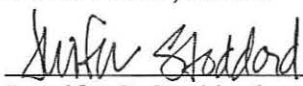
A hearing will be held in open court on a motion by Plaintiff Neighborhood Credit Union to File Documents Under Seal pursuant to TEX. R. CIV. P. 76a.

Any person may intervene and be heard concerning the sealing of the records. The hearing will be held on **May 3, 2017 at 10:30 a.m.** in the 95th Judicial District Court of Dallas, Dallas County, Texas.

The case in which the records are sought involves claims surrounding alleged trade secrets and unauthorized possession and use of such trade secrets, tortuous interference with prospective relations, unfair competition by misappropriation, trade secret misappropriation, breach of fiduciary duty, conversion and conspiracy. The records the Plaintiff seeks to seal are client lists and information contained therein which Plaintiff claims are confidential, proprietary trade secrets.

Respectfully Submitted,

STODDARD LAW, PLLC

By: 
Jennifer S. Stoddard
JenniferS@stoddlawtx.com
State Bar No. 19260650
Lynne Page Clarke

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COUNTY CLERK
DALLAS COUNTY

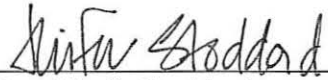
LynneC@stoddlawtx.com
State Bar No. 04316750
8150 N. Central Expressway
Suite 1150
Dallas, TX 75206
T: (214) 884-4900
F: (214) 884-4910

*Attorneys for Plaintiff,
Neighborhood Credit Union*

VERIFICATION OF NOTICE OF MOTION TO SEAL COURT RECORDS

BEFORE ME, the undersigned notary, on this day personally appeared Jennifer S. Stoddard, the affiant, whose identity is known to me. After I administered an oath, affiant testified as follows:

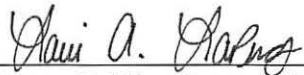
“My name is Jennifer S. Stoddard. I am capable of making this verification. I certify that the Plaintiff, Neighborhood Credit Union’s Notice of Motion to Seal Court Records, attached hereto as *Exhibit A*, was posted at the place where notices for meetings of the Dallas County governmental bodies are required to be posted on April 10, 2017. The facts stated in the Notice are within my personal knowledge and are true and correct.”



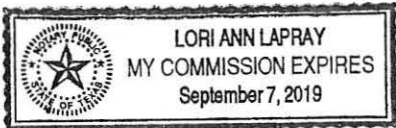
Jennifer S. Stoddard

STATE OF TEXAS §
 §
COUNTY OF DALLAS §

SWORN AND SUBSCRIBED before me by Jennifer S. Stoddard on this the 10th day of April, 2017.



Notary Public, State of Texas



CERTIFICATE OF SERVICE

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This is to certify that a true and correct copy of the foregoing document was served on this the 10th day of April, 2017, in accordance with the Texas Rules of Civil Procedure via Electronic Service to:

COUNTY CLERK
DALLAS COUNTY

Via Electronic Service:

Mr. Gregory P. Sapire
Mr. John M. Farrell
K&L Gates, LLP
1717 Main Street, Suite 2800
Dallas, TX 77002-7342
greg.sapire@klgates.com
john.farrell@klgates.com

Via Electronic Service:

Supreme Court of Texas
Supreme Court Building
201 W. 14th Street, Room 104
Austin, TX 78711



Jennifer S. Stoddard