

**FILED**

MAR 23 2012

Harry G. Carroll  
J.S.C.

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Attorneys for Plaintiff

**JAMES O'KEEFE, III,**

**Plaintiff,**

**vs.**

**NADIA NAFFE,**

**Defendant.**

SUPERIOR COURT OF NEW JERSEY  
CHANCERY DIV.: BERGEN COUNTY  
DOCKET NO.: C-93-12

CIVIL ACTION

**ORDER TO SHOW CAUSE WITH  
TEMPORARY RESTRAINTS**

This matter having been opened to the Court by Aromando & Light, LLC, attorneys for Plaintiff James O'Keefe, III, upon Plaintiff's Verified Complaint and accompanying papers in support of Plaintiff's application for immediate temporary restraints and for accelerated discovery;

**AND IT APPEARING** from the Verified Complaint that Defendant Nadia Naffe is in possession of Plaintiff's private, proprietary and confidential information that has been stored on his personal computer ("Information");

**AND IT FURTHER APPEARING** that Defendant came into possession of the Information without permission from Plaintiff;

**AND IT FURTHER APPEARING** that the Defendant has released some of the Information and is presently threatening to release more Information to the public;

**AND IT FURTHER APPEARING** that Plaintiff will suffer irreparable harm unless the Court orders the relief set forth herein;

AND this Court having considered the likelihood of ultimate success of Plaintiff's claims, the balance of the hardships to the parties, the public interest, and whether Plaintiff will suffer immediate and irreparable harm if restraints are not entered against Defendant;

AND good cause otherwise having been shown for the entry of this Order;

IT IS ON THIS 23 day of March, 2012;

ORDERED that Defendant Nadia Naffe and any person(s) acting in concert or participation with her who receives actual notice of this Order by personal service or otherwise, be and hereby are temporarily restrained and enjoined from disclosing, discussing, publishing or otherwise communicating the Information to or with any third party;

AND IT IS FURTHER ORDERED that Defendant show cause on MAY 14, 2012, at 9 o'clock A.m. as to why a preliminary injunction should not be entered against her continuing the above restraints through the final adjudication of this matter; and

AND IT IS FURTHER ORDERED that Defendant shall have and bring with her to the hearing on MAY 14, 2012, at 9 o'clock A.m. all originals and copies of the Information whether the Information is stored electronically or is contained in any other media whatsoever, including print; and

IT IS FURTHER ORDERED that Defendant shall submit any briefs in opposition to this application and any related papers on or before JUNE 30 2012 and Plaintiffs shall submit a reply brief and any related papers on or before MAY 8, 2012; and

CASE NAME: JAMES O'NEAL, III v. SARAH RAFFL  
DOCKET NUMBER: C-98-11

SUPPLEMENTAL PROVISIONS TO ORDER TO SHOW CAUSE

**Returnable:**

***SERVICE OF PLEADINGS***

A copy of this order to show cause, verified complaint, legal memorandum and any supporting affidavits or certifications submitted in support of this application be served upon the defendant personally within 3 days of the date hereof, in accordance with R. 4:4-3 and R. 4:4-4, this being original process.

***PROOF OF SERVICE***

The plaintiff must file with the court his/her/its proof of service of the pleadings on the defendant no later than three (3) days before the return day.

***DEFENDANT'S OSC/INJUNCTIVE RELIEF RESPONSE REQUIREMENTS***

Defendant shall file and serve a written response to this order to show cause and the request for entry of injunctive relief and proof of service by 4/30/12. The original documents must be filed with the clerk of the Superior Court, Room 340. You must send a copy of your opposition papers directly to Judge Harry G. Carroll, whose address is Room 424, Courthouse, Hackensack, New Jersey. You must also send a copy of your opposition papers to the plaintiff's attorney whose name and address appears at the top of these papers, or to the plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file your opposition and pay the required fee and serve your opposition on your adversary, if you want the court to hear your opposition to the injunctive relief the plaintiff is seeking. NOTE: These papers are not the Answer to plaintiff's complaint, which must be filed within 35 days (see below).

***PLAINTIFF'S REPLY RESPONSIBILITY***

The plaintiff must file and serve any written reply to the defendant's order to show cause opposition 5/8/12. The reply papers must be filed with the Clerk of the Superior Court and a copy of the reply papers must be sent directly to the chambers of Judge Carroll.

***OSC MAY PROCEED EX-PARTE***

If the plaintiff does not file and serve opposition to this order to show cause, the application will be decided on the papers on the return day and relief may be granted by default, provided that the plaintiff files a proof of service and a proposed form of order at least three days prior to the return day.

***PREHEARING SUBMISSION FORM OF ORDER/JUDGMENT***

If the defendant has not already done so, a proposed form of order addressing the relief sought on the return day (along with a self-addressed return envelope with return address and postage) must be submitted to the court no later than 3 days before the return day.

***NOTICE TO DEFENDANT - LAWSUIT ANSWER RESPONSIBILITY***

Defendant, take notice that the plaintiff has filed a lawsuit against you in the Superior Court of New Jersey. The verified complaint attached to this order to show cause states the basis of the lawsuit. If you dispute this complaint, you, or your attorney, must file a written answer to the complaint and proof of service within 35 days from the day of service of this order to show cause; not counting the day you received it. These documents must be filed with the Clerk of the Superior Court. Include the filing fee, payable to the "Clerk of the Superior Court." You must also send a copy of your Answer to the plaintiff's attorney whose name and address appear on these papers, or to the plaintiff, if no attorney is named. A telephone call will not protect your rights; you must file and serve your Answer (with the fee) or judgment may be entered against you by default. Please note: Opposition to the order to show cause is not an Answer and you must file both. Please note further: If you do not file and serve an Answer within 35 days of this Order, the Court may enter a default against you for the relief plaintiff demands.

***LEGAL SERVICES NOTICE***

If you cannot afford an attorney, you may call the Legal Services office in the county in which you live. If you do not have an attorney and are not eligible for free legal assistance you may obtain a referral to an attorney by calling one of the Lawyer Referral Services.

***RETURN DAY TESTIMONY***

The Court will entertain argument, but not testimony, on the return day of the order to show cause, unless the court and parties are advised to the contrary no later than 3 days before the return day.

  
Hon. Harry G. Carroll, J.S.C.