

**SUIT FOR PREVENTION OF MISUSE OF CONFIDENTIAL
INFORMATION/DATA/TRADE SECRETS**

IN THE _____ COURT OF _____ AT _____

IN ITS COMMERCIAL DIVISION

COMMERCIAL IP SUIT NO. _____ OF 20____

_____,)

a company incorporated under the)

Companies Act, 1956/2013,)

having its registered office at _____)

_____)

and administrative office at _____)

_____)

_____) ... PLAINTIFF

Versus

1. _____)

_____)

_____)

2. _____,)

a company incorporated under the)

Companies Act, 1956/2013,)

having its registered office at _____)
 _____)
 _____) ... DEFENDANTS

THE PLAINTIFF ABOVE NAMED STATES AS UNDER:

1. The Plaintiff is a company incorporated under the provisions of the Companies Act, 1956/2013, having its principal place of business at _____. The Defendant No. 1 is an ex-employee of the Plaintiff. The Defendant No. 2 is a private limited company incorporated on _____ which is controlled and managed by the Defendant No. 1. The Defendant No. 1 and his family members are the major Shareholders of the Defendant No. 2 Company. The Defendant No. 1 is also the Chairman and Managing Director of Defendant No. 2.

2. The Plaintiff is constrained to approach this Hon'ble Court by way of the present Suit, *inter alia*, seeking injunctive reliefs against the illegal and unlawful acts of the Defendants who have, in connivance with one another, stolen confidential information, sensitive data and trade secrets of the Plaintiff and have infringed the copyright of the Plaintiff in its literary work i.e. the end product which it has created after analyzing years of acquired raw data, which was used to create and set up its business. Defendant No. 1 has violated and breached its contractual obligations entered into with Plaintiff with impunity. The Defendant has compromised confidential information, sensitive data and trade secrets, all proprietary to the Plaintiff, thereby

causing loss to the business of the Plaintiff and further by using the said data offered an identical product based upon an identical business model as that of Plaintiff. Establishing such a business would not be possible without using the unique sensitive data and confidential information proprietary to the Plaintiff. Further, the Plaintiff apprehends that Defendants are approaching the Plaintiff's clients and business partners, thus, attempting to cause irreparable wrongful loss and harm to the business of the Plaintiff.

3. Plaintiff's company is based in India and regulated by the _____. **(Note: - Give a brief history of the Plaintiff and its current business where the data is being used)**

4. Plaintiff renders value added innovative services to its customers, including technological know-how based on a technological digital platform created on account of confidential information and proprietary, sensitive data and trade secrets accumulated and developed by Plaintiff independently. Plaintiff's products are simple, convenient, customer friendly, catered towards customer needs, easy to claim under and priced appropriately and created with innovative technologies developed after significant amount of research, development and value addition, which is unique and not available with any other competitor or the public at large and which form a part of Plaintiff's, trade secret, confidential information, copyright protected work etc. Plaintiff is the first in the industry to create and roll out an innovative and revolutionary business model in relation to _____ creating products and services such as _____ that have not been thought of, tried

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