

7. Defendant does not hold any interest in the Company, he is not an owner of the company, he is not an officer or director of the Company, he is not employed by the Company, and he is not an agent or representative of the Company.

8. Recently, on or about 11/13/15, Defendant entered Plaintiff's premises in Menands, NY and engaged in disruptive conduct.

9. In particular, he attempted to countermand my instructions to Plaintiff's employees, became abusive to the employees.

10. This conduct has been repeated on other occasions.

11. As a direct result, two of Plaintiff's employees have recently quit.

12. Defendant has been repeatedly told to leave the premises, that he was not welcome on the premises, that he was not to return and that his conduct was disruptive and detrimental to Plaintiff's business operations.

13. Defendant has ignored this direction and has repeatedly returned to the premises and continued to engage in his disruptive and damaging conduct.

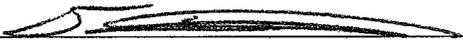
14. Defendant's conduct has caused and will continue to cause irreparable damage to Plaintiff and Plaintiff's business operations.

15. In order to prevent further damage to the Company, I am requesting that the Court immediately grant a temporary restraining order enjoining Defendant from entering upon any premises owned or operated by Plaintiff as well as otherwise enjoining Defendant from engaging in conduct that interferes with Plaintiff's business operations.

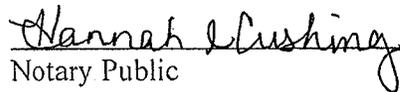
16. I am also requesting that the Court seal the record of this matter. As noted above, the Defendant's conduct detailed herein has impacted a number of the Company's employees. In relation to this action, I expect that certain personal and/or professional details concerning those

employees will come to light. In order to protect the privacy of the Company's employees, whose involvement is only relevant in relation to the Defendant's conduct, I am requesting that the Court seal the record. Moreover, the public airing of the internal strife and disruption that Defendant has caused to the Company could place the Company at a competitive disadvantage and cause even further damage to business. For these reasons, I believe there is good cause to seal the record of this matter.

WHEREFORE, based on the foregoing, I respectfully request that the Court issue an order granting the relief requested by the Company.


Demetrios Haseotes

Sworn to before me this
3 day of ~~November 2015~~ December 2015


Notary Public

Hannah I. Cushing
Notary Public - State of NY
No 01C06332626
Qualified in Albany County
My Commission Expires 11/23/2019

On the 3rd Day of December 2015 before me personally came Demetrios Haseotes to me known, who, being by me duly sworn, did depose and say that he resides in 407 West St. Pittsfield, MA.