



Richardson + Burgess LLP

Extraordinary Remedies

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Can't you make them stop?



**Freeze
Assets**



**Trade Secrets /
Noncompetes /
Dilution**



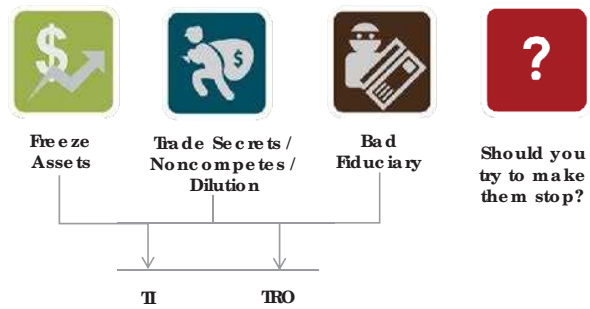
**Bad
Fiduciary**

All clients want the relief – and they want it right now.

Can't you make them ?



Examples



Can't you make them ?



- Cause of action against the defendant
- Probable right to the relief sought
- Probable, imminent and irreparable injury in the interim
 "Irreparable" = can't be adequately compensated in damages or the damages can't be measured by any certain pecuniary standard
(Butnaru v. Ford Motor Co., 84 SW.3d 198 (Tex. 2002))
- Client can post bond
- Judge agrees with you—denial of a temporary restraining order is not appealable at all, and "whether or not to grant a temporary injunction is within the court's sound discretion."
(ICON En. Adm'rs II LP v. Abbott, 409 SW.3d 897, 902 (Tex. App.—Austin 2013, pet. denied)

Can't you make them ?

No

Maybe

Examples



Freeze Assets



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Bad
Fiduciary



Should you
try to make
them stop?

II

TRO



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