

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

TELECOM FIBER, LLC,)	
)	Civil Action File No.:
Plaintiff,)	
)	
v.)	
)	
GEORGE BRUCE MULRONEY,)	JURY TRIAL DEMANDED
BRANDON SCOTT EVANS,)	
ERNEST JACOB CROWE, and)	
JARED REDMOND CHARLES,)	
)	
Defendants.)	

VERIFIED COMPLAINT

COMES NOW Plaintiff Telecom Fiber, LLC (“Telecom Fiber”) and files this its Verified Complaint against Defendants George Bruce Mulroney (“Defendant Mulroney”), Brandon Scott Evans (“Defendant Evans”); Ernest Jacob Crowe (“Defendant Crowe”); and Jared Redmond Charles (“Defendant Charles”) and respectfully shows this Court as follows:

PARTIES AND JURISDICTION

1.

Telecom Fiber is a Georgia limited liability company, duly organized and registered with the Georgia Secretary of State.

2.

Telecom Fiber's principal place of business is located at 922 Hurricane Shoals Road, NE; Building A; Lawrenceville, Georgia 30043.

3.

Defendant Mulronev is a Georgia resident who may be served with process at 303 Junction Court; Winder, Barrow County, Georgia 30680 or otherwise as provided by law.

4.

Defendant Mulronev is subject to the personal jurisdiction of this Court.

5.

Defendant Evans is a Georgia resident who may be served with process at 543 Hickeria Way; Winder, Barrow County, Georgia 30680 or otherwise as provided by law.

6.

Defendant Evans is subject to the personal jurisdiction of this Court.

7.

Defendant Crowe is a Georgia resident who may be served with process at 880 Arch Tanner Road; Bethlehem, Barrow County, Georgia 30620 or otherwise as provided by law.

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8.

Defendant Crowe is subject to the personal jurisdiction of this Court.

9.

Defendant Charles is a Georgia resident who may be served with process at 395 Bates Avenue; Fayetteville, Fayette County, Georgia 30215 or otherwise as provided by law.

10.

Defendant Charles is subject to the personal jurisdiction of this Court.

11.

This Court has subject matter jurisdiction over Counts II and VII of this Complaint pursuant to 28 U.S.C. § 1331 because these claims arise under federal law.

12.

This Court has subject matter jurisdiction over Telecom Fiber's state law claims (Counts I, III-VI, and VIII-XI) pursuant to 28 U.S.C. § 1367.

13.

Venue in this Court is proper pursuant to 28 U.S.C. § 1391(b)(1) because each defendant resides in this judicial district and all defendants are residents of the state in which this judicial district is located.

14.

Venue in this Court is proper pursuant to 28 U.S.C. § 1391(b)(2) because a substantial part of the events or omissions giving rise to the claims in this action occurred in this judicial district.

15.

By agreement of the parties, this action is governed by Georgia law.

16.

Georgia has a legitimate and material interest in enforcing restrictive covenants entered into by companies that are headquartered here. Given that Telecom Fiber is headquartered in Georgia, there is a valid and legitimate basis for the Employee Covenants Agreements (defined herein) to have a Georgia forum selection clause.

STATEMENT OF FACTS

17.

Telecom Fiber is a leading installer of fiber optic cable and service provider for fiber optic networks for the southeastern United States.

18.

Telecom Fiber constructs fiber optic networks and provides emergency response and maintenance services for fiber optic networks.

19.

A large percentage of Telecom Fiber's revenue is derived from providing emergency response services and repairing breaks or interruptions in a fiber optic network.

20.

Telecom Fiber has expended significant resources in developing its proprietary information including Telecom Fiber's operational structure; customer, supplier, and vendor contracts; pricing structure and pricing matrix; material costs pricing matrix; Fiber Technician training program; methods of reporting on-the-job test results; detailed records of its customers' networks including building locations, network layouts, fiber routes, fiber splicing diagrams, as-built records, and distance records; fully-stocked service truck inventory and design; quality control procedures for Telecom Fiber's services; and customer information and customer service model. The foregoing proprietary information is hereinafter collectively referred to as "Trade Secrets."

21.

Telecom Fiber's Trade Secrets are valuable confidential business information which are not publicly available or known.

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