

**IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY, OHIO
CIVIL DIVISION**

THE CITY OF COLUMBUS,

Plaintiff,

v.

DAVID LEROY ROSS, JR.,

Defendant.

Case No. 24-CV-6703

JUDGE SHERYL K. MUNSON

MAGISTRATE MARK PETRUCCI

AGREED PRELIMINARY INJUNCTION

On August 29, 2024, Judge Kim Brown of the Franklin County Court of Common Pleas granted Plaintiff City of Columbus (“the City”) an *ex parte* temporary restraining order (“the TRO”) against Defendant, David Leroy Ross, Jr. (“Ross”). The TRO has temporarily enjoined Ross from accessing, and/or downloading, and/or disseminating any data purportedly stolen from the City in connection with the City’s recent data breach (“City Data”). The TRO is set to expire on September 12, 2024. A Preliminary Injunction hearing is scheduled for September 12, 2024 at 10:00 a.m. The City and Ross agree to forego the hearing and voluntarily enter into this **Agreed Preliminary Injunction** under the following terms:

(1) Ross shall be enjoined from disseminating any City Data that he has obtained that identifies Personal Identifiable Information including, but not limited to, Social Security Numbers, driver’s license numbers, bank account information, credit card numbers, and personal medical information (which may or may not be classified as Protected Health Information (PHI) for purposes of HIPAA) should such information be found, until the final resolution of this case;

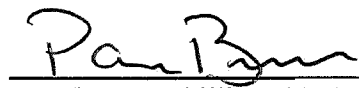
(2) Ross shall be enjoined from disseminating any City Data from the City's MATRIX Prosecutor and MATRIX Crime databases during the recent cyber incident that he has obtained until the final resolution of this case;

(3) Ross shall be permitted to disseminate, including by providing copies, City Data to officers of the Columbus Division of Police ("CPD") designated by the City Attorney's Office, attorneys representing the City, or their agents irrespective of the provisions in Sections 1 and 2;

(4) Ross shall be permitted to disseminate City Data that the City agrees is subject to disclosure under the Ohio Public Records Act, Ohio Revised Code Section 149.43. Ross shall first obtain a written agreement from the City before disseminating any information under this Section; and

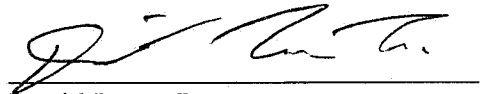
(5) Nothing in this Agreement shall prevent either the City or Ross from petitioning the Court to dissolve the Agreed Preliminary Injunction at any time.

Respectfully submitted,



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PRO SE DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that, on **September 11th 2024**, I electronically filed the foregoing with the Court using the Court's CM/ECF system.



Paul M. Bernhart (0079543)