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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

MAY 16 2014 ✓

R. Mc Elyea

REC

MAY 19 2014

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE**

LEADFUSION, INC., a Delaware Corporation,

Plaintiff,

vs.

BILL POLLOCK, an individual, FINTACTIX,
LLC a Limited Liability Company, and DOES 1-
10,

Defendants.

CASE NO. RIC 1216290

**SECOND AMENDED COMPLAINT
FOR:**

**(1) BREACH OF CONTRACT
[COUNT #1];
(2) BREACH OF CONTRACT
[COUNT #2];
(3) MISAPPROPRIATION OF TRADE
SECRETS;
(4) BREACH OF FIDUCIARY DUTY;
(5) CONVERSION**

JURY TRIAL DEMANDED

Complaint Filed: November 2, 2012

Plaintiff Leadfusion, Inc. ("Plaintiff" or "Leadfusion"), complains and alleges against Defendants Bill Pollock ("Defendant" or "Mr. Pollock") and Fintactix, LLC ("Fintactix") as follows:

This lawsuit arises because a former employee went too far when developing a competing software offering. That former employee, Defendant Pollock, took unlawful advantage of