

Jordan Grotzinger ([00:05](#)):

Welcome to the trade secret law evolution podcast, where we give you comprehensive summaries and takeaways on the latest developments and trends in trade secret law. We want you to stay current and ahead of the curve when it comes to protecting your company's most valuable assets. I'm your host Jordan Grotzinger

Speaker 2 ([00:25](#)):

[inaudible]

Jordan Grotzinger ([00:26](#)):

Kevin, how are you doing?

Kevin Cole ([00:27](#)):

I'm doing great. Jordan. How about you?

New Speaker ([00:28](#)):

I am good. So this is the last episode of our year.

Kevin Cole ([00:35](#)):

It is, I thought were going to have eggnog. What happened to that?

Jordan Grotzinger ([00:38](#)):

I did mention that didn't I? Yeah. Andrew, what happened to the eggnog? Anyway, what we decided to do this year is a year in review. So we're going to go back over some of the cases that we discussed throughout the year, we picked some highlights, uh, which we thought were the most pertinent takeaways for the year. And, and we're going to try not to go into as much detail, uh, about each case as we did throughout the episodes, but just kind of hit the points that we wanted to hit and give some 2019 takeaway. So I thought we'd just go in backwards order since frankly, it's easier to flip through right.

Jordan Grotzinger ([01:23](#)):

What we got here. So the first case we'll talk about was it was a pretty important one, uh, out of the California court of appeal in October, dealing with the statute of limitations. That was the first trade secrets case published in some time by the California court of appeal. And it was kind of a cautionary tale. This was the dispute between toy companies over a brand of dolls. The plaintiff served discovery requesting information about the defendant's efforts to obtain the plaintiff's trade secrets. And days later, the plaintiff asserted in an affirmative defense that the defendant had acted with unclean hands, including by spying on the plaintiff and attempting to gain access to its showrooms. So in other words, uh, this discovery and the affirmative defense suggested that the plaintiff knew something was up relative to potential trade secret misappropriation,

Kevin Cole ([02:19](#)):

right? Which the court later called, uh, suspicious and then three years and three days later, the plaintiff counterclaimed for violation of the uniform trade secret act. And the defendant raised the, uh, the

three-year statute of limitations defense, but the district court ruled that the counterclaim was compulsory and sufficiently related back to an earlier pleading. So the plaintiff gets its verdict on its Street's secret misappropriation claim of more than \$80 million. Uh, but the ninth circuit reversed the district court's ruling that the plaintiff's counterclaim was compulsory and vacated the verdict, and then it directed the district court to dismiss the claim without prejudice.

Jordan Grotzinger ([02:58](#)):

So, so all that after an \$80 million verdict. So the plaintiff refiled the trade secret case, but in state court and the defendant moved for summary judgment on statute of limitations grounds, uh, alleging that the three-year period are arguing that the three-year period had run by the time the plaintiff filed its trade secret misappropriation claim in federal court and the California court of appeal agreed and held that under California law quote, the same suspicions that allowed the plaintiff to request discovery and plead the unclean hands defense in federal court in 2007 were sufficient to trigger the statute of limitations,

Kevin Cole ([03:39](#)):

Right? And the court of appeals of we're still at the court of appeal stated the rule, uh, this way they said, quote, the statute of limitations begins to run when the plaintiff has reason to suspect an injury and some wrongful cause unless the plaintiff proves a reasonable investigation at the time would not have revealed a factual basis for the claim.

Jordan Grotzinger ([04:02](#)):

And it also elaborated that the plaintiff need not be aware of the specific facts. If suspicion exists along the lines. In this case, the plaintiff must quote, go find the facts. And lastly, there was quite a bit more detailed to this case, but we're kind of running through it too, to just give you the summary. Lastly, the plaintiff argued that it only had notice or, or knowledge of at most two trade secrets that the defendant had misappropriated when it filed that affirmative defense. But the court said, quote, it's simply cannot agree with the plaintiff's compartmentalization of its suspicion of wrongdoing. A defendant in these circumstances cannot Don blinders to avoid the accrual of the statute of limitations close quote, and that the court said defies common sense. So what were the takeaways from this one?

Kevin Cole ([04:57](#)):

Right. So the big takeaway from this one, and again, this was a pretty important just because it was, as Jordan said, it was the first published California court of appeal case in a while. And that the big takeaway was that for the statute of limitations to start running, uh, the plaintiff need not be aware of the specific facts, but if a plaintiff, a plaintiff should be reasonably suspicious, then the plaintiff must, uh, and what the court said was quote, go find the facts. Uh, and, and what that means is, you know, the standard is flexible and it allows courts to second guess and, uh, it can be fatal to a claim.

Jordan Grotzinger ([05:33](#)):

And also the plaintiff can't compartmentalize the acts of misappropriation for statute of limitations purposes. The court essentially viewed the trade secret misappropriation here as a single act for statute of limitations purposes. So separate acts, the takeaway is won't make separate limitations, periods run. So in this case, the plaintiff was saying, well, we only, you know, at most we were only suspicious enough about to trade secrets, but not others, but the court said you can't compartmentalize that way, which is, um, rather severe, but that was the ruling. So it is an important takeaway,

Kevin Cole ([06:13](#)):

right? And then the final takeaway was that the plaintiff need not have sufficient evidence to support its case, but a reasonable suspicion is all it takes. And, uh, you know, again, that, that sort of gets to it being a flexible standard in terms of what it is that the plaintiff has to show.

Jordan Grotzinger ([06:28](#)):

The next case we're going to talk about was one out of the Southern district of Indiana in September, and this dealt with establishing likelihood of success for purposes of injunctive relief after an unauthorized download that contains trade secrets. So in that case, the plaintiff was in the business of hydro excavation and the defendant was a regional manager who joined a competitor. Like we see frequently, the defendant was responsible for an exposed to, um, the growth of the plaintiff's customer accounts, sales strategies, et cetera. And, uh, as is typical in these cases signed confidentiality and non-compete slash non-solicitation agreements with the plaintiff that required the return of the plaintiff's property upon termination,

Kevin Cole ([07:22](#)):

right? So the defendant was then solicited by a competitor, which is not a party to the case, uh, resigned from the plaintiff's employment that same day, but didn't say where he was going and was reminded of his obligations under the confidentiality agreement. Uh, but the defendant was alleged to have downloaded over 5,000 documents on the, uh, the evening of his resignation, including budgets, uh, employee contact, information, pricing, information, strategic plans, financials, and training materials. Uh, so then the plaintiff sued for violation of Indiana's uniform trade, secret act and related claims. And, uh, the plaintiff also sought a preliminary injunction.

Jordan Grotzinger ([08:02](#)):

So the plaintiff provided a detailed summary of the documents and noted that Indiana courts have generally held that several of the identified categories of documentation qualify as either confidential information or trade secrets when they are subject to reasonable efforts to maintain their secrecy such as those employed by the plaintiff here.

Kevin Cole ([08:25](#)):

Right? So then, uh, the defendant argued that the plaintiff failed to explain how each document qualifies as a trade secret, but the court held and, you know, Jordan, I, I remember talking about this one very, uh, you know, this one really stood out to me. It was a very practical approach what the court said and what the court said was that courts, I guess in Indiana, have not placed such a burden of proof on the plaintiffs, particularly at the pleading stage when they're tasked with quickly reviewing thousands of documents.

Jordan Grotzinger ([08:53](#)):

So the takeaway there is, and it's a really useful one because it's a, it's very much a recurring issue. We see this a lot. In these cases, you get a call from a concerned client about somebody who had jumped ship, and you noticed that the computers had been accessed and a bunch of data had been downloaded. And, um, and it's, uh, it's a hectic foggy process. So the practical approach that the Indiana court took, and the takeaway here is that with, with a large document, download like this, you don't

necessarily have to establish that every stolen document is a trade secret in order to get injunctive relief.

Jordan Grotzinger ([09:36](#)):

Rather, this court said to establish likelihood of success on trade secret, misappropriation, at least summarize in detail, the kinds of documents that were stolen, and those should be types of documents or data generally held to be trade secrets and establish that the plaintiff took reasonable measures to keep them secret. So you don't have to go through thousands of documents that say, you know, document 265 is a trade secret because X, Y, Z document 266, rather you can identify categories. If those categories are generally recognized as trade secrets, and also establish that the plaintiff took reasonable measures to maintain secrecy that might not cut it at a trial, but this isn't a trial. It's an injunctive relief motion. It's a motion for preliminary injunction. So all you have to show is a likelihood of success. So the burden, while not insignificant is manageable,

Kevin Cole ([10:36](#)):

Right? The next case is a case from this is one that we had discussed, uh, one from the district of Rhode Island, federal case in September of 2019. And we thought this was actually a pretty interesting case because it actually was, it was a three week jury trial, uh, early, earlier this year. And it covered a lot of the important issues that we've talked about. And in that case, the jury found that a trade secret, uh, was established and also found misappropriation, but the court vacated that judgment and ordered a new trial,

Jordan Grotzinger ([11:06](#)):

Right? And in that case, the plaintiff produced automated instruments used in blood tests. The individual defendant left the plaintiff for a corporate defendant competitor. And within a year, the corporate defendant debuted a comparable device. And then, uh, some serious contentious litigation and sued including, uh, allegations of willful misappropriation under the Rhode Island uniform trade secrets act and breach of the individual defendants confidential, uh, relationship with the plaintiff.

Kevin Cole ([11:42](#)):

Right? So the jury, uh, found that both defendants had misappropriated, uh, two trade secrets. The first was, and this is an, this is a quote from the opinion using clear plastic capillary photo meter sensor, sorry, that's a difficult time saying that one and an automated ESR analyzer, and then separately, an algorithm concerning the conversion of photometric measurements.

Jordan Grotzinger ([12:08](#)):

So the jury finds willfulness and awards \$6.5 million in damages, but the defendants moved for judgment as a matter of law and for a new trial. And the court found that the plaintiff failed to introduce evidence that quote, using a clear plastic capillary photometer sensor in an automated ESR analyzer satisfied the Rhode Island uniform trade secrets act requirements for protectability and the technical language there while dense and probably confusing to most. It's not really the point. The point is that in this case, they were trying to prove that the trade secret was this a clear plastic capillary photometer.

Kevin Cole ([12:57](#)):

But the court found that viewed in a light most favorable to the verdict, the plaintiff's evidence showed that it was developing a black or a dark CPS to increase its analyzers reliability. The court found that the plaintiff's alleged trade secret was not the use of any plastic CPS, but actually a clear one. And as the court went on to say, these are the particular features plaintiff used to distinguish it's trade secret from general industry knowledge and other words to establish the requisite a secrecy.

Jordan Grotzinger ([13:32](#)):

So the takeaway here is pretty simple and, and this was a complicated, extensive decision, but for purposes of what we're summarizing today, simple takeaway, and that is just when you're prosecuting a trade secret claim, don't forget to match your proof to your definition of what the trade secret is. You know, in this case, a multimillion dollar jury verdict was overturned because just because the proof didn't match the quote unquote clear CPS trade secret definition that the plaintiff had put forward. So sorta common sense, but very important.

Kevin Cole ([14:11](#)):

Right? And you know, obviously sometimes, you know, when you're in a trial, you know, things are moving very fast and, you know, you've got to put a lot of pieces together, but particularly, I guess, important when you're really trying to prove a trade secret is you really have to make sure it's short and said that your proof, uh, lines up to what it is you're claiming is actually a trade secret that, you know, we saw here how fatal that was,

Jordan Grotzinger ([14:30](#)):

Right. So it's just a function of sticking to the fundamentals. The next case deals with a trade secret identification, which of course we've addressed throughout the year. This was a Southern district of New York case from September here for employees of a plastic surgery practice who had worked as patient coordinators, sued their employer, uh, under the fair labor standards act and state law, and the employer counterclaim for violations of the defend trade secrets act and New York common law and related claims. Uh, the plaintiff's moved to dismiss the entire counterclaim.

Kevin Cole ([15:08](#)):

The defendants alleged that the plaintiff employees had acquired receipt of the practices, terms and conditions of employment, including trade secret protections that their jobs as patient coordinators gave them access to patient contact information that employees started working for a competitor and actually referred cases to that competitor and that they used the practices, quote methods for advertising and communicating and violation of their non-compete.

New Speaker ([15:35](#)):

So specifically in the defend trade secrets act, claim the defendants alleged that the employees misappropriated trade secrets by quote, using their specialized training and skills learned by the practice, including their trade secrets, with respect to patient coordination, signing up patients, advertising, and other techniques closed quote with their new employer.

Kevin Cole ([16:01](#)):

But the court held that that was insufficient. And as we've discussed previously, uh, while there is no specificity requirement in the second circuit, uh, which is where the appeals from the Southern district

go, the plaintiffs must plead their trade secret with sufficient specificity to inform the defendants of what they are alleged to have misappropriated. So despite the lack of a specificity requirement, the leading pleading cases, which are Iqbal and Twombly, those are Supreme court cases. Those require that the complaint have sufficient information about the alleged trade secret nature, uh, the value and measures taken to safeguard it, to support an inference that the information qualifies as it Trade secret.

Jordan Grotzinger ([16:41](#)):

And the court said, quote, there's no one size all definition, but the factors that the pleader and ultimately the plaintiff or claimant trying to prove this case should address include practical things that are not elements of trade secrets, per se, but support findings that the information in question constitutes trade secrets, and those factors include things like the extent to which the information is known outside the business, the extent to which the information is known by employees and others inside the business, the extent of measures taken to guard secrecy. Of course, that that is an element of a trade secret, the value of the information to the business and its competitors. That too is an element. That's the independent economic value element. Here's one, that's not an element, but can support these findings, the plaintiff's investment in the information at issue. In other words, the amount of effort or money spent on developing it and the ease or difficulty with which the information could be properly acquired or duplicated by others. And here are the defendants didn't address these factors, but instead only described the, uh, trade secrets quote at the highest level of abstraction. So the claim was dismissed without leave to amend,

Kevin Cole ([18:04](#)):

Right? So then really the big takeaway from that is a trade secret identification involves more than literally identifying the alleged trade secret, uh, you know, which can be customer lists or algorithms, pricing information, et cetera, that also involves supporting the elements of a trade secret. So for example, you have to show that it actually is kept secret, uh, that it's valuable because it's a secret that the business or that you've taken reasonable steps to keep it a secret. All of the factors that the court in this case discussed those all relate to whether these elements are met,

Jordan Grotzinger ([18:37](#)):

Right? And the list of factors that I just gave is longer than the list of elements of, of a trade secret. The elements, you know, the only elements of trade secret are that the information is secret. It's valuable because it's secret and it's subject to reasonable means to maintain the secrecy. Two of those were included in the list, but that longer list supports, uh, all of those elements. And it it's, uh, you know, it as a, as a matter of common sense, if you can show for example, that the plaintiff invested all of this time and money developing the alleged trade secret, that supports a finding that it didn't already exist. And in fact it is novel. So, uh, that's a handy list of factors, I think, no matter what jurisdiction you're litigating in.

Kevin Cole ([19:30](#)):

So the next case, this is it's an important case because, uh, similar to the last one, it involves, uh, an insufficient trade secret showing. So this was a case from the Northern district of Ohio in, uh, July of 2019, the plaintiff is a distributor of transmission parts and it purchased assets for a Detroit branch and hired an individual defendant as its regional manager who entered into the standard non-disclosure agreement. And non-compete the individual defendant was later hired by the defendant competitor company. Then the defendant company hired other, uh, employees that were former employees of the

plaintiffs. The plaintiff then sued under Ohio's uniform trade secret act and moved for a preliminary injunction from using or disclosing its trade secrets. So preventing the defendant from doing those two things,

Jordan Grotzinger ([20:21](#)):

The plaintiff's theory was that the defendant, like in many cases, the defendants rated the plaintiff's company and, and also relied on the inevitable disclosure doctrine. That is because the defendants knew the plaintiff's customer information and business strategy and other confidential information they'll inevitably misappropriate them.

Kevin Cole ([20:41](#)):

Right? So then the court noted factors that the Ohio Supreme court would consider when whether or not material rises to the level of being a trade secret, including the extent to which the information is known outside the business precautions to maintain secrecy, you know, things that we literally just talked about, the savings affected and the value to the holder and having the information, uh, protected from competitors and the amount of money spent in development, and also what it would take others to duplicate that information. So again, similar to what Jordan actually just said, it's, it's all information showing that the business has put a lot of money into this is keeping this stuff secret. And that, you know, this is information that if it got into the hands of someone else, that that person, or that company would have a real competitive advantage.

Jordan Grotzinger ([21:25](#)):

and that showing was insufficient in this case. So the court, uh, found that the plaintiff could not show a likelihood of success. And again, the takeaway is to make a showing that material or information is a trade secret for injunctive purposes, or generally in addition to supporting the elements, generally it helps to explain things like, and this is really just another factor that can support these findings, that wasn't specifically in the list from the New York case, but it's another helpful factor. Things like quote savings effected and the value to the holder in having the information as against competitors close quote, and as in the New York case, the amount of money spent in development and what it would take others to duplicate the information. So again, just kind of common sense factors that if the court finds that these are established logically speaking, it supports the finding that the material is a trade secret.

Kevin Cole ([22:30](#)):

So the next case, uh, this is one involving, uh, reasonable measures to maintain secrecy and also, uh, the independent value or the economic value of a trade secret. This is a case out of the Eastern district of New York from July of 2019. And in that case, the plaintiff hired, uh, the defendant's company to redesign this website. Uh, the relationship blew up and the defendants blocked access to the new website and also blocked access to, uh, the social media account that had, had created for the plaintiff and even wrote a quote stealing isn't nice pay your bill on the website. And then they also posted a negative content on plaintiff's own Instagram account.

Jordan Grotzinger ([23:09](#)):

So the plaintiff demanded control of that media and the defendants kept sending higher and higher invoices. So the plaintiff sued for trade secret misappropriation and related claims the defendants defaulted, but the court noted that district courts don't need to agree that the alleged facts constitute a valid cause of action. So it dug in a little bit and examined the claims,

Kevin Cole ([23:34](#)):

right? And one of the interesting takeaways from that opinion was, uh, the court held that passwords don't possess independent economic value because I mean, they're valuable because they allow access to websites, but they're not independently valuable. And the way the court explained it was quote put differently because the economic value of the passwords is not independent of the websites they are used to access the passwords themselves are not trade secrets.

Jordan Grotzinger ([24:01](#)):

So Why do we discuss this case? It's not a particularly big trade secret misappropriation case. You know, it's out of the Eastern district of New York. And it seems to be frankly, a relatively small time fight over passwords to a website. The reason we discussed it is because we thought it really illustrates nicely what independent economic value means. The statutes don't really explain it. It just says, you know, th th th the information has got to be secret. It's got to have independent economic value and be subject to reasonable measures to maintain secrecy. This case did a good job of explaining that what that means what independent economic value means is that the economic value must be independent of the value to the plaintiff, such that others could derive value from the trade secret. So, in other words, independent economic value is something that means that the trade secret of the material is valuable not only to the plaintiff, but to others like competitors, who, if they got their hands on, it could derive value from it. That's where the independent comes from. And that case, uh, illustrates the point nicely.

Kevin Cole ([25:21](#)):

Right? So For example, you know, while things like formulas and customer lists may have independent economic failure in this case, you know, the login credentials, uh, those are essentially valuable only to the plaintiffs because, you know, they help them access their own systems, but they don't necessarily reach that other independent economic requirements. Right.

Jordan Grotzinger ([25:40](#)):

Right. So one more case, going back to June of 2019, which was pretty close to the beginning of this podcast, this was a case out of the Northern district of California. Again, dealing with trade secret identification, it's appropriate to close on that point since it's probably the most prevalent point that we address in this podcast. So in that case, the plaintiff sued for violation of the California uniform trade secrets act and the defend trade secrets act and move for an injunction to prevent a misappropriation of source code among other things. The court found that the plaintiff failed to identify the source code with sufficient particularity and the injunction was denied,

Kevin Cole ([26:24](#)):

Right? So the, uh, the complaints defined source code by listing five payment processing algorithms, uh, the court then explained that the party seeking injunctive relief must identify the trade secret again with sufficient particularity, uh, the listing of algorithms was, and

Jordan Grotzinger ([26:44](#)):

Not comprehensive the court distinguished that case from another recent case where the plaintiff filed a 22 page ID of 10 specific trade secrets, which included descriptions of the functionality of each trade secret, along with named files, reflecting the source code specific to each trade secret, and the plaintiff left open its definition, even more broadly seeking an injunction of misappropriation of trade secrets,

quote, and other proprietary information such as, but not limited to, uh, you know, a list of other things close quote, that that can be fatal language in an injunctive situation. And the takeaway is if moving to an, if you're moving to enjoin misappropriation, identify the trade secrets with sufficient particularity and be comprehensive and not exemplary by, for example, using open-ended language like including, but not limited to. And this is a point that you seem to run into all the time in various stages of trade secret litigation.

Jordan Grotzinger ([27:57](#)):

And it's a bit of a slippery slope because look at the beginning of a trade secret misappropriation case, if you're the plaintiff rare is the case, if ever, where you know exactly what was stolen, that is just the nature of theft, right? It's a, it's usually, uh, a secret act or, or it is intended to be. And so usually you don't know exactly what was stolen. And so it's a reasonable thing for a counsel representing a plaintiff to say, particularly early in the case, here are the things we think were misappropriated misappropriated, and we're seeking injunction of misappropriation of them and other trade secrets, including, but not limited to whatever you want to resist the urge in at least at the injunctive phase, uh, to use that kind of language, or, or maybe to tie it down a little more specifically, and avoid that argument by a defendant, um, frame your injunctive requests for whatever trade secrets you can identify and perhaps reserve the right to go back in and seek future relief.

Jordan Grotzinger ([29:11](#)):

If you identify more trade secrets, because we've seen more than one case this year in which injunctions were denied, because as this court said, the identification of trade secrets was, was not comprehensive, but was exemplary. And so it's a slippery slope that needs to be navigated carefully, uh, and, and serious thought should be put into how to frame your request as effectively. And specifically as you can, with usually the limited knowledge you have, because like I said, you're not going to know everything. So I think the ultimate takeaway here, because you can expect a plaintiff to identify every trade secret misappropriated at the injunctive stage is to frame your request for an injunction more tightly. And that involves some simple transparency judge. We know that these five trade secrets misappropriated, we are seeking to enjoin the misappropriation of them. There may be more in which case we'll go back to court and identify them, or you can add the language.

Jordan Grotzinger ([30:29](#)):

You know, we know there's more, we haven't identified them yet. So, uh, we're seeking to enjoin the misappropriation of the ones we have identified and others, we think might've been misappropriated like including, but not limited to whatever and frame your request. As, you know, if the court's not inclined to enjoin the ladder, Justin joined the former and we'll go back in later. But these are just, there are different ways to frame your injunctive requests so that you can minimize the risk of the argument that, Oh, these are, this is just an exemplary list. It's too hypothetical. You're not being comprehensive.

Kevin Cole ([31:09](#)):

Right. And actually we saw that literally last month, remember we talked about a case out of the Southern district of Florida, what are the lawyers had used, you know, including, but not limited to. And, and what we said was, you know, it's lawyers often and, you know, we see it in statutes. We see it in contracts. Lawyers like to use that language, including, but not limited to, because we like to cover all of our bases, but you know, here, you know, what, what you're saying is, you know, you, you, you, you're saying that there are trade secrets that you haven't identified, but I think as Jordan said, you know, to,

to frame it in a way where you're, you're making it very tight, you're preserving your ability to then go back to the judge and say, well, even though we didn't at the time identify these trade secrets, we preserved our right to it. And now we're coming back and identifying these other ones,

Jordan Grotzinger ([31:49](#)):

Or if you're real. Yeah. Or if you're really concerned that, because you just know there's more trade secrets misappropriated than, you know, you could frame your injunctive requests as an alternative request. In other words, judge, enjoying the misappropriation of these five identified trade secrets and, uh, other, uh, confidential information, including, but not limited to whatever, or alternatively enjoying just the five. And if we identify more in the future, we'll come back to court. Right? So the examples, we've only given a few examples. I bet there's a lot more with creative thinking, but the point is that creative thinking should be, uh, undertaken when framing a request for an injunction so that it for the season, what a great project this has been and will continue to be Kevin, I'm very grateful to you for stepping up and, and doing, um, a lot of the heavy lifting after Jenna MacCabe went to the ninth circuit.

Jordan Grotzinger ([32:56](#)):

My pleasure. Yeah. I've got to give a shout out to Jenna, my, uh, my founding partner in this venture. This has been very fulfilling to us. And I know we say this in the, uh, outro, uh, in every episode, but I want to emphasize it here. We're getting some nice traction with this podcast. We are the number one, uh, podcast on trade secret law on Apple, at least I think on other platforms too. But I haven't checked that in a few days, which is amazing because this forces us to sort of stay smart and share it with all of you. And ultimately the goal is to, to, uh, help our listeners and develop relationships. And, and to that end, we'd love to know more about what you think and what we could do better. This is not perfect. And I'm sure there are a lot of ways we could improve. So you have our email addresses, we'd love your feedback, good or bad. Um, and if you like what you hear, we'd appreciate you reviewing us on our platforms, Apple, Stitcher, and Spotify, because that helps spread the word and get more listeners. So we will be back soon. We're off for the year. We'll be back in the first half of January. I want to thank everybody on our team and all of our listeners for a really great exciting year. And we can't wait to be back in January, happy holidays, everybody. And until next time,

Jordan Grotzinger ([34:26](#)):

Okay, that's a wrap. Thanks for joining us on this episode of the trade secret law evolution podcast as the law evolves. So will this podcast. So we value your feedback, let us know how we can be more helpful to you. Send us your questions and comments. You can reach me by email at GrotzingerJ@gtlaw.com or on LinkedIn. And if you like, what you hear, please spread the word and feel free to review us. Also, please subscribe. We're on Apple podcasts, Stitcher, Spotify, and other platforms. Thanks everybody. Until next time,

Jenna MacCabe ([34:58](#)):

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