

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
GREENBELT DIVISION**

**METROPOLITAN REGIONAL
INFORMATION SYSTEMS, INC.,**

Plaintiff,

v.

**AMERICAN HOME REALTY NETWORK, INC.
and JONATHAN J. CARDELLA,**

Defendants.

**CIVIL ACTION NO.
8:12-cv-00954-AW**

PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65, and for the reasons set forth in the accompanying Memorandum, Plaintiff Metropolitan Regional Information Systems, Inc. ("MRIS") respectfully moves this Court for an order preliminarily enjoining Defendants American Home Realty Network, Inc. d/b/a NeighborCity.com ("AHR") and Jonathan J. Cardella, (collectively, "Defendants"), their officers, agents, servants, employees, attorneys, and those persons in active concert or participation with them who receive actual notice of the order by personal service or otherwise, from copying, using, displaying, distributing, or creating derivative works from copyrighted informational content taken from MRIS' real estate listing database ("MRIS Database"), during the pendency of this action.

As detailed in the accompanying memorandum and declarations attached thereto, MRIS is one of the country's largest online real estate multiple listing services. Through the MRIS Database, MRIS maintains and provides authorized, licensed subscribers and other authorized users with access to and use of a copyrighted automated catalog that contains a compilation of

regional real estate property listings and related informational content. To build their real estate referral business, Defendants have unlawfully taken copyrighted informational content, including real estate listings, photographs, and related content, from the MRIS Database for its own website, NeighborCity.com. A preliminary injunction is necessary to stop Defendants' copyright infringement and to protect MRIS, its authorized real estate broker and agent subscribers, and the public, from the irreparable harm that arises every day that Defendants are permitted to continue their infringing activities.

A proposed Order is submitted with this motion.

Respectfully submitted,

Dated: April 4, 2012

By: /s/John T. Westermeier
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