

IN THE CIRCUIT COURT OF THE 15<sup>TH</sup>  
JUDICIAL CIRCUIT IN AND FOR PALM  
BEACH COUNTY, FLORIDA

CASE NO. CA 50 2003-CA9323XX-OC-AD

DRAWDY BROTHERS CONSTRUCTION, II, INC.

Plaintiff,

vs.

GREGORY FULFORD,

Defendant.

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**AFFIDAVIT OF JASON THOMAS**

STATE OF FLORIDA  
COUNTY OF ORANGE

BEFORE ME, the undersigned authority, personally appeared Jason Thomas, who, upon oath, deposes and says as follows:

1. The statements set forth herein are based upon personal knowledge.
2. I am and at all times relevant herein have been President of Concrete division for T&T Construction of Central Florida, Inc. ("T&T"). In that capacity, I hired Gregory Fulford ("Greg Fulford") after he was terminated from his employment with Drawdy Brothers Construction, II, Inc. ("Drawdy II").
3. Greg Fulford has never shared with me or anyone else at T&T, to my knowledge, any trade secret or confidential information which he might have learned while employed by Drawdy Brothers Construction, Inc. or Drawdy II.
4. Before the Grooms' Dormitory project in Boynton Beach, T&T had a pre-existing relationship with the General Contractor on the Grooms' Dormitory project,

Wieland-Davco. Mr. Fulford had no involvement whatsoever in the bidding or contract negotiation for that project. T&T had performed concrete work on two (2) prior projects for Wieland-Davco and submitted a bid for the Grooms' Dormitory project. After the bid was submitted, Wieland-Davco contracted with T&T. FURTHER AFFIANT SAITH NOT.

Jason J. Thomas. 12-9-03  
JASON THOMAS

Sworn to and subscribed before me this 9<sup>th</sup> day of December, 2003, by Jason Thomas, who is personally known to me, or produced \_\_\_\_\_ as identification.



Kelly Malcolm  
Notary Public  
Print Name: Kelly Malcolm

My Commission Expires: May 22, 2005