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9 Attorneys for Plaintiff Ameranth, Inc.  
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12 UNITED STATES DISTRICT COURT  
13 SOUTHERN DISTRICT OF CALIFORNIA  
14

15 AMERANTH, INC.

16 Plaintiff,

17 v.

18 PIZZA HUT, INC., PIZZA HUT OF  
AMERICA, INC., DOMINO'S PIZZA, LLC,  
19 DOMINO'S PIZZA, INC., PAPA JOHN'S  
USA, INC., OPENTABLE, INC.,  
20 GRUBHUB, INC., TICKETMOB, LLC,  
EXIT 41, LLC, QUIKORDER, INC.,  
21 SEAMLESS NORTH AMERICA, LLC, and  
O-WEB TECHNOLOGIES LTD.,  
22

23 Defendants.

Civil Action No.: 3:11-cv-01810-JLS-NLS

**SECOND AMENDED COMPLAINT FOR  
PATENT INFRINGEMENT**

JURY TRIAL DEMANDED

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1 system/product/service, which includes, *inter alia*, wireless and internet point-of-sale (“POS”)  
2 integration, online and mobile product ordering, integration with social media and/or other  
3 third-party web-based applications, and other hospitality aspects.

4 3. Defendant Domino’s Pizza, LLC is, on information and belief, a Michigan limited  
5 liability company having a principal place of business in Ann Arbor, Michigan. Defendant  
6 Domino’s Pizza, Inc. is, on information and belief, a Delaware corporation having a principal  
7 place of business in Ann Arbor, Michigan. On information and belief, Domino’s Pizza, LLC  
8 and Domino’s Pizza, Inc. are agents and affiliates of one another and knowingly and  
9 intentionally acted in concert and under common and coordinated plan, design and control in  
10 committing the acts alleged herein, such that each entity is jointly and severally liable for the  
11 acts of each other. Domino’s Pizza, LLC and Domino’s Pizza, Inc. shall be referred to herein  
12 collectively as “Domino’s.” On information and belief, Domino’s makes, uses, offers for sale  
13 or license and/or sells or licenses restaurant and foodservice information technology products,  
14 software, components and/or systems within this Judicial District, including the Domino’s  
15 Pizza ordering system/product/service, which includes, *inter alia*, wireless and internet POS  
16 integration, online and mobile product ordering, integration with social media and/or other  
17 third-party web-based applications, and other hospitality aspects.

18 4. Defendant Papa John’s USA, Inc. (“Papa John’s”) is, on information and belief, a  
19 Kentucky corporation having a principal place of business in Louisville, Kentucky. On  
20 information and belief, Papa John’s makes, uses, offers for sale or license and/or sells or  
21 licenses restaurant and foodservice information technology products, software, components  
22 and/or systems within this Judicial District, including the Papa John’s ordering  
23 system/product/service, which includes, *inter alia*, wireless and internet POS integration,  
24 online and mobile product ordering, integration with social media and/or other third-party  
25 web-based applications, and other hospitality aspects.

26 5. Defendant OpenTable, Inc. (“OpenTable”) is, on information and belief, a Delaware  
27 corporation having a principal place of business in San Francisco, California. On information  
28 and belief, OpenTable makes, uses, offers for sale or license and/or sells or licenses restaurant

1 and foodservice information technology products, software, components and/or systems  
2 within this Judicial District, including the OpenTable system/product/service, which includes,  
3 *inter alia*, OpenTable online and mobile reservations and guest management, integration with  
4 social media and/or other third-party web-based applications, and other hospitality aspects.

5 6. Defendant GrubHub, Inc. (“GrubHub”) is, on information and belief, a Delaware  
6 corporation having a principal place of business in Chicago, Illinois. On information and  
7 belief, GrubHub makes, uses, offers for sale or license and/or sells or licenses restaurant and  
8 foodservice information technology products, software, components and/or systems within  
9 this Judicial District, including the GrubHub system/product/service, which includes, *inter*  
10 *alia*, GrubHub online and mobile product ordering, integration with social media and/or other  
11 third-party web-based applications, and other hospitality aspects.

12 7. Defendant Ticketmob, LLC is, on information and belief, a California limited  
13 liability company having a principal place of business in Los Angeles, California, doing  
14 business as “LaughStub, LLC” (“LaughStub”). On information and belief, LaughStub makes,  
15 uses, offers for sale or license and/or sells or licenses entertainment box office management  
16 and ticketing information technology products, software, components and/or systems within  
17 this Judicial District, including the LaughStub system/product/service, which includes, *inter*  
18 *alia*, LaughStub online and mobile ticketing and reservations, integration with social media  
19 and/or other third-party web-based applications, and other hospitality aspects.

20 8. Defendant Exit 41, LLC (“Exit 41”) is, on information and belief, a Delaware  
21 limited liability company having a principal place of business in Andover, Massachusetts. On  
22 information and belief, Exit 41 makes, uses, offers for sale or license and/or sells or licenses  
23 restaurant and foodservice information technology products, software, components and/or  
24 systems within this Judicial District, including the Exit 41 ordering system/product/service,  
25 which includes, *inter alia*, wireless and internet POS integration, online and mobile product  
26 ordering, integration with social media and/or other third-party web-based applications, and  
27 other hospitality aspects.

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1 9. Defendant QuikOrder, Inc. (“QuikOrder”) is, on information and belief, an Illinois  
2 corporation having a principal place of business in Chicago, Illinois. On information and  
3 belief, QuikOrder makes, uses, offers for sale or license and/or sells or licenses restaurant and  
4 foodservice information technology products, software, components and/or systems within  
5 this Judicial District, including the Pizza Hut ordering system/product/service, which  
6 includes, *inter alia*, wireless and internet POS integration, online and mobile product  
7 ordering, integration with social media and/or other third-party web-based applications, and  
8 other hospitality aspects.

9 10. Defendant Seamless North America, LLC (“Seamless”) is, on information and  
10 belief, a Delaware limited liability company having a principal place of business in New  
11 York, New York. On information and belief, Seamless makes, uses, offers for sale or license  
12 and/or sells or licenses restaurant and foodservice information technology products, software,  
13 components and/or systems within this Judicial District, including the Seamless  
14 system/product/service, which includes, *inter alia*, Seamless online and mobile product  
15 ordering, integration with social media and/or other third-party web-based applications, and  
16 other hospitality aspects.

17 11. Defendant O-Web Technologies Ltd. is, on information and belief, an Ohio limited  
18 liability company having a principal place of business in Cleveland, Ohio, doing business as  
19 “Onosys” (“Onosys”). On information and belief, Onosys makes, uses, offers for sale or  
20 license and/or sells or licenses restaurant and foodservice information technology products,  
21 software, components and/or systems within this Judicial District, including the Onosys  
22 ordering system/product/service, which includes, *inter alia*, wireless and internet POS  
23 integration, online and mobile product ordering, integration with social media and/or other  
24 third-party web-based applications, and other hospitality aspects.

25 JURISDICTION AND VENUE

26 12. This is an action for patent infringement arising under the Patent Laws of the United  
27 States, 35 U.S.C. §§ 271, 281-285.

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