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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

AMERANTH, INC.  
  
Plaintiff,  
  
v.  
  
PIZZA HUT, INC., ET AL.  
  
Defendants.

Civil Action No.: 3:11-cv-01810-JLS-NLS  
  
Consolidated with:  
12cv729 JLS-NLS                    12cv1640 JLS-NLS  
12cv731 JLS-NLS                    12cv1642 JLS-NLS  
12cv732 JLS-NLS                    12cv1643 JLS-NLS  
12cv733 JLS-NLS                    12cv1644 JLS-NLS  
12cv737 JLS-NLS                    12cv1646 JLS-NLS  
12cv739 JLS-NLS                    12cv1648 JLS-NLS  
12cv742 JLS-NLS                    12cv1649 JLS-NLS  
12cv858 JLS-NLS                    12cv1650 JLS-NLS  
12cv1627 JLS-NLS                    12cv1651 JLS-NLS  
12cv1629 JLS-NLS                    12cv1652 JLS-NLS  
12cv1630 JLS-NLS                    12cv1653 JLS-NLS  
12cv1631 JLS-NLS                    12cv1654 JLS-NLS  
12cv1633 JLS-NLS                    12cv1655 JLS-NLS  
12cv1634 JLS-NLS                    12cv1656 JLS-NLS  
12cv1636 JLS-NLS                    12cv1659 JLS-NLS

**DISCLOSURE OF ASSERTED CLAIMS  
AND INFRINGEMENT CONTENTIONS  
AS TO DEFENDANT MICROS SYSTEMS,  
INC.**

Complaint Filed: August 15, 2011

AND RELATED CASES.

1 Plaintiff Ameranth, Inc. hereby serves its Disclosure of Asserted Claims  
2 and Infringement Contentions under Patent Local Rule 3.1, as to Defendant  
3 MICROS Systems, Inc. (“MICROS”).

4 Discovery in this case is ongoing and the Court has not yet construed the  
5 asserted claims of the Patents-in-Suit. Further, MICROS (and other Defendants)  
6 has not produced sufficient responsive documents and responses to Ameranth’s  
7 discovery requests.

8 Ameranth reserves the right to serve Amended Infringement Contentions  
9 under Patent Local Rule 3.6(a), by Court order, or as otherwise permitted.  
10 Under Patent Local Rule 3.2, Ameranth is making a document production and  
11 hereby separately identifies by bates numbers which documents correspond to  
12 categories (a) – (e) of Patent Local Rule 3.2 in Exhibit D attached hereto.

13 **A. Claims Infringed.**

14 MICROS infringes at least:

15 MICROS Restaurant Management Systems Solutions (“RMS”):  
16 claims 1, 2, 3, 4, 5, 6, 7, 8, 10, 11, 12, 13, 14, 15, and 16 of U.S. Patent No.  
17 6,384,850 (the “ ‘850 patent”); claims 1, 2, 4, 6, 7, 8, 9, 10, 11, 12, and 13 of  
18 U.S. Patent No. 6,871,325 (the “ ‘325 patent”); and claims 1, 4, 6, 7, 8, 9, 11, 13,  
19 16, 17, and 18 of U.S. Patent No. 8,146,077 (the “ ‘077 patent”);

20 MICROS Hospitality Solutions International Restaurant and Food  
21 Service Solutions (“HSI”): claims 1, 2, 3, 4, 5, 6, 7, 8, 10, 11, 12, 13, 14, 15, and  
22 16 of U.S. Patent No. 6,384,850 (the “ ‘850 patent”); claims 1, 2, 4, 6, 7, 8, 9,  
23 10, 11, 12, and 13 of U.S. Patent No. 6,871,325 (the “ ‘325 patent”); and claims  
24 1, 6, 7, 8, 9, 11, 13, 16, 17, and 18 of U.S. Patent No. 8,146,077 (the “ ‘077  
25 patent”);

26 MICROS Property Management Systems Solutions (“PMS”):  
27 claims 1, 3, 4, 5, 6, 7, 8, 10, 11, 12, 13, 14, 15, and 16 of U.S. Patent No.  
28

1 6,384,850 (the “ ‘850 patent”) ; claims 1, 2, 4, 6, 7, 8, 9, 10, 11, 12, and 13 of  
2 U.S. Patent No. 6,871,325 (the “ ‘325 patent”); and claims 1, 6, 7, 8, 9, 11, 13,  
3 16, 17, and 18 of U.S. Patent No. 8,146,077 (the “ ‘077 patent”).

4 **B. Accused Instrumentalities.**

5 The “MICROS Restaurant Management System,” “MICROS RMS” or  
6 “Accused System,” means and includes the following: The current and all  
7 previous “versions” (from Jan. 1, 2007 to present, and regardless of whether  
8 alleged by defendant to be revisions, different versions, or different systems) of  
9 the MICROS Systems, Inc. RMS system/product/service, which includes, inter  
10 alia, point of sale restaurant management systems (e.g., RES RMS and  
11 Symphony), back-of-house enterprise management systems (e.g., mymicros.net,  
12 Symphony, RES), customer loyalty and gift card systems (e.g., RES, iCare),  
13 enterprise dashboard systems (e.g., mymicros.net), wireless and internet  
14 integration, wireless, online and mobile food ordering systems (e.g., RES,  
15 Symphony, Mobile Micros, mycentral and webOrdering), online and mobile  
16 table management and reservation systems (e.g., MICROS Table Management  
17 System (“TMS”) and myreservations), mobile payment systems (e.g.,  
18 Tabbedout, iCard Mobile Wallet, and NFC Pay-at-the-Table) and other  
19 applications via, for example, MICROS’s software products/modules,  
20 website(s), hosted services and mobile website(s) and, inter alia, iPhone,  
21 Android, Windows and other mobile apps (as detailed throughout these  
22 disclosures), integration with e-mail and affinity program and social media  
23 applications such as Facebook, Twitter, Groupon, and YouTube, and/or other  
24 third-party web-based applications and other hospitality aspects including, inter  
25 alia, integration with Google Maps, TabbedOut, Verifone, third party ticketing  
26 applications/companies, third party travel aggregators, theme park systems, third  
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1 party payment processing providers and third party RMS/POS order entry  
2 providers.

3 The “HSI RMS,” or “Accused System,” means and includes the  
4 following: The current and all previous “versions” (from Jan. 1, 2007 to  
5 present, and regardless of whether alleged by defendant to be revisions, different  
6 versions, or different systems) of the HSI RMS, which includes, inter alia, point  
7 of sale restaurant management systems (e.g. Profit Series), back-of-house  
8 enterprise management systems (e.g. Myhsi.net), customer loyalty and gift card  
9 systems (e.g. iCare), enterprise dashboard systems (e.g. mysentinel), hardware  
10 solutions such as a handheld point-of-sale and point-of-sale terminals, online  
11 and mobile food ordering systems (e.g. mycentral), online and mobile table  
12 management and reservation systems (e.g. MICROS Table Management System  
13 and myreservations), and mobile payment systems (e.g. Tabbedout, iCard  
14 Mobile Wallet, and NFC Pay-at-the-Table).

15 The “MICROS Property Management System”, or “Accused System” means  
16 and includes the following: The current and all previous “versions” (from Jan. 1,  
17 2007 to present, and regardless of whether alleged by defendant to be revisions,  
18 different versions, or different systems) of the MICROS Systems, Inc.  
19 hotel/property management system/product/service, which includes, *inter alia*,  
20 wireless and internet integration, online and mobile ordering and reservations,  
21 customer loyalty, remote management, frequent-guest and other applications  
22 via, for example, MICROS software products/modules, website(s), hosted  
23 services and mobile website and, inter alia, iPhone, Android, Windows and  
24 other mobile apps (as detailed throughout these disclosures), integration with e-  
25 mail and affinity program and social media applications such as Facebook,  
26 Twitter, and YouTube, and/or other third-party web-based applications and  
27 other hospitality aspects including, *inter alia*, integration with Google Maps,  
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