IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ARDENT LABS, INC., d/b/a COMULATE	)	
Plaintiff,	)	
v.	)	Case No. 26-cv-00591
APPLIED SYSTEMS, INC.,	)	ORAL ARGUMENT REQUESTED
Defendant.	)	Hon. Manish S. Shah

APPLIED'S MOTION TO DISMISS COMULATE'S AMENDED COMPLAINT

Defendant Applied Systems, Inc. ("Applied"), by and through its undersigned counsel, hereby moves to dismiss the Complaint, pursuant to Federal Rule of Civil Procedure 12(b)(6). Per the applicable Court Procedures, Counsel for Applied contacted Counsel for Plaintiff Ardent Labs Inc., d/b/a Comulate ("Comulate"), asking whether it consented to the motion. Comulate opposes this motion.

In support of this motion, and as set forth in the supporting Memorandum of Law in Support of Applied's Motion To Dismiss Comulate's Amended Complaint (the "Memorandum"), Applied states as follows:

1. The Court should dismiss the Amended Complaint in its entirety because Comulate lacks antitrust standing, its tort claims are barred by applicable privileges, and Comulate fails to adequately plead any of its claims.

WHEREFORE, Applied respectfully requests that the Court grant this motion, enter an order dismissing the Complaint, and award Applied any additional relief that the Court deems just and proper.

Dated: April 3, 2026

Respectfully submitted,

s/ Sam S. Stake

Jonathan C. Bunge (Ill. Bar #6202603)
Nathan Hamstra (Ill. Bar # 6286325)
QUINN EMANUEL URQUHART & SULLIVAN, LLP
1101 N. Wacker Dr., Suite 2700
Chicago, IL 60606
(312) 705-7400
jonathanbunge@quinnemanuel.com
nathanhamstra@quinnemanuel.com

Sam S. Stake (admitted *pro hac vice*)
QUINN EMANUEL URQUHART & SULLIVAN, LLP
50 California Street, 22nd Floor
San Francisco, CA 94111-4624
(415) 875-6600
samstake@quinnemanuel.com

Aaron H. Perahia (admitted *pro hac vice*)
QUINN EMANUEL URQUHART & SULLIVAN, LLP
865 S Figueroa Street
Los Angeles, California 90017
(213) 443-3000
aaronperahia@quinnemanuel.com

Sami H. Rashid (admitted *pro hac vice*)
David LeRay (admitted *pro hac vice*)
Salvadore J. Diaz (admitted *pro hac vice*)
QUINN EMANUEL URQUHART & SULLIVAN, LLP
295 Fifth Avenue
New York, New York 10016
(212) 849-7000
salvadorediaz@quinnemanuel.com

Attorneys for Defendant Applied Systems, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on April 3, 2026, I filed the foregoing document with the United States District Court for the Northern District of Illinois using the CM/ECF system and caused it to be served on all registered participants via the notice of electronic filing.

/s/ Sam S. Stake
Sam S. Stake