

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

APPLIED SYSTEMS, INC.,)	
)	
Plaintiff,)	ORAL ARGUMENT REQUESTED
)	
v.)	Case No. 1:25-cv-14251
)	
PBC Consulting Inc. and ARDENT LABS,)	District Judge Manish S. Shah
INC., d/b/a COMULATE,)	Magistrate Judge Maria Valdez
)	
Defendants.)	
)	
)	
)	

PLAINTIFF APPLIED’S OPPOSED MOTION FOR A PRELIMINARY INJUNCTION

Plaintiff Applied Systems, Inc. (“Applied”), by and through its undersigned counsel, hereby moves for an Order pursuant to Federal Rule of Civil Procedure 65 granting Applied a preliminary injunction.

In support of this motion, and as set forth in the supporting Memorandum of Law in Support of Plaintiff’s Motion for a Preliminary Injunction (the “Memorandum”), Applied states as follows:

Comulate created a sham entity, PBC, for the purpose of accessing Applied’s Epic software system (“Epic”) and Applied’s software development kit (“SDK”) in a sandbox environment. With that access Comulate, through PBC, agreed to a aster Agreement and Schedule SDK, which imposed various restrictions on its use of Applied’s Confidential Information. Comulate breached those restrictions by using its access to Epic and the SDK to develop its own products and compete with Applied. As a result of Comulate’s breach, Applied will suffer irreprable harm, at least in the form of unfair competition and continuing threat of loss of customers, A preliminary injunction is necessary to prevent these harms.

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

Dated: December 15, 2025

Respectfully submitted,

/s/ Jonathan C. Bunge

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Attorneys for Plaintiff Applied Systems, Inc.

MEET AND CONFER CERTIFICATE

Pursuant to Local Rule 37.2, on December 11 and 12, 2025, Plaintiff sought their position via email correspondence on the motion for preliminary injunction. Defendants' indicated they oppose.

/s/ Jonathan C. Bunge
Jonathan C. Bunge

CERTIFICATE OF SERVICE

I hereby certify that on December 15, 2025, 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/ Jonathan C. Bunge
Jonathan C. Bunge