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IN THE UNITED STATES DISTRICT COURT
 DISTRICT OF UTAH

<p>ISYS TECHNOLOGIES, INC., a Nevada Corporation, Plaintiff, vs. GOOGLE, INC., a Delaware Corporation; SAMSUNG ELECTRONICS USA, INC., a Delaware Corporation; ACER AMERICA CORP., a California Corporation; AMAZON.COM, INC., a Delaware Corporation; and BEST BUY CO., INC., a Minnesota Corporation; Defendant.</p>	<p>Civil Action No. 2:11-CV-507 CW Judge Clark Waddoups PLAINTIFF ISYS TECHNOLOGY INC.'S COMBINED MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION</p>
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Plaintiff ISYS Technology, Inc. ("ISYS") through its counsel of record, respectfully moves for entry of a preliminary injunction against Defendants Google Inc. ("Google"), Samsung Electronics USA, Inc., ("Samsung"); Acer America Corp., ("Acer"); Amazon.com, Inc., ("Amazon"); and Best Buy Co., Inc. (Best Buy).

ISYS files this motion, and seeks a preliminary injunction, for the following reasons:

1. ISYS has continuous and extensive use of its trademark CHROMIUMPC in interstate commerce since November 2009 as used in connection with computer hardware products. Isys does not sell computer software.

2. On June 21, 2010 ISYS filed an application for Federal Trademark Registration No. 85/067977 (“977”) for the trademark CHROMIUMPC. The United States Patent and Trademark Office published the mark for opposition.

3. ISYS is the senior user of the CHROMIUMPC mark in connection with computer hardware.

4. The software giant Google has never filed a trademark application for the CHROMIUM mark in connection with computer hardware.

5. Google filed an opposition to Isys’ CHROMIUMPC trademark application based on its own CHROMIUM trademark application for software.

6. Google abandoned its rights to the Chromium marks when it issued a naked license for its software to the open-source community as part of the CHROMIUM project. Google’s continued maintenance of the Opposition proceeding is done in bad faith.

7. Google’s Opposition petition is improper because it has abandoned any rights it may have had to the CHROMIUM mark it is asserting in the proceeding.

8. Recently numerous reports, news stories and advertising by Google and others states that Google has announced and intends to introduce a new computer system to be sold under the name CHROMEBOOK, available for ordering on June 15, 2011.

9. The websites for Samsung, Amazon and Best Buy also indicate that the Google’s new product will be offered for sale in connection with CHROMEBOOK trademark.

10. Google's use of the CHROMEBOOK mark is likely to cause reverse confusion and false association between ISYS and Google.

11. Google's use of the CHROMEBOOK mark, combined with its ability to completely saturate a market with a trademark similar to Isys' mark will irreparably damage ISYS's rights and goodwill in its CHROMIUMPC mark.

12. ISYS moves the Court to preserve the status quo and prevent irreparable damage to ISYS' valuable trademark rights by preventing Defendants Google, Acer, Samsung, Amazon and Best Buy from advertising, promoting and using the CHROMEBOOK mark.

A memorandum in support of ISYS' Motions for Preliminary Injunction and Temporary Restraining Order is submitted herewith.

DATED this 6th day of June, 2011.

KIRTON & McCONKIE

By: s/Todd E. Zenger
Todd E. Zenger
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Attorney for Plaintiff
ISYS TECHNOLOGIES, INC.