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1 ROBERT EUGENE ROJAS #5307556

2 GSI 6618 ST.

3 SEP 12 2022

4 SACRAMENTO, CA 95814

CLERK U.S. DISTRICT COURT
5 ATTORNEY FOR THE PLAINTIFF EASTERN DISTRICT OF CALIFORNIA

BY

6 IN PROPIA PERSONA DEPUTY CLERK

7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 ISLAND AND SUGAR HILL CAFE

11 PLAINTIFF. CASE No. 1:22-cv-01163-SAB

(PC)

12 COMPLAINT FOR PATENT INFRINGEMENT

13 v. DECLARATORY AND INJUNCTIVE RELIEF

DUNKIN' LLC; STARBUCKS INC.;

CALIFORNIA DEPT. OF CORRECTION AND REHABILITATION;

SACRAMENTO COUNTY MAIN JAIL;

DEANNA PATTERSON; RENATA PLESCHUCK KOWALSKI

14 INTRODUCTION

15 1. This action arises out of patent infringement under
16 Title 35 of the United States Patent Act U.S.C. §§ 1 et seq., and U.S.C. 271.

17 2. Defendants have been infringing Plaintiff's patents,
18 including coconut milk refreshers and
19 and continues to do so through the present date as set forth
20 in more detail below.

21 3. Plaintiff, thus seeks injunctive relief against
22 Defendants infringement of its patent as well as damages
23 for Defendants past and ongoing patent infringement.

24 RECEIVED

25 SEP 12 2022

26 Page 1 of

27 CLERK U.S. DISTRICT COURT
28 EASTERN DISTRICT OF CALIFORNIA
BY *[Signature]* DEPUTY CLERK

1 4. Plaintiff is the founder, creator, and owner of
2 the Island and Sugarchill cafe and the beverages and food
3 listed on its menu. (Business Plans attached as exhibit A).

4 5. Plaintiff is the inventor of the coconut milk
5 refreshers,

6 6. Plaintiff creates culinary art master pieces for
7 consumption in the food and coffee house industry.
8 Plaintiff's business is predicated on its ownership and use of
9 this culinary artwork.

10 7. Plaintiff has spent a considerable amount of time
11 and resources researching and creating marketable
12 and aesthetically, tastefully appealing culinary artwork for
13 consumption to consumers.

14 8. Defendants in this case have developed, created, used,
15 sold, imported, and (or) purchased, without permission
16 product bearing the resemblance of certain proprietary culinary
17 artwork belonging to Plaintiff.

JURISDICTION AND VENUE

19 9. This lawsuit is a civil action for patent infringement
20 rising under the patent laws of the United States, 35 U.S.C.
21 §§ 101 et seq. and 271. The court has subject matter jurisdiction
22 pursuant to 28 U.S.C. §§ 1331, 1332, 1338(j), and 1801.

23 10. The court has personal jurisdiction over Defendants
24 because Defendants are incorporated in the State of
25 California, and Defendant has multiple businesses it runs
26 within the courts jurisdiction and district.

27 11. Defendants are present, living, conducting business,
28 within and holds a minimum of contracts within the

1 The State of California and the Eastern District of California
2 for the Fresno Region. Defendants have purposely availed
3 themselves of the privileges of conducting business in the State
4 of California, in the Eastern District of the Fresno Region.
5 Defendants have sought protection and benefit from the laws
6 of California. Defendants regularly conduct business in
7 within the state of California and within this District; and
8 Plaintiff's cause of action arises directly from Defendants
9 contacts and other activities in the state of California and in
10 this District for Fresno Region.

11 12. Defendants have regular and established places
12 of business in this District for the Fresno Region, have
13 transacted business in this District, and have directly and (or)
14 indirectly committed acts of Patent infringement in this
15 District.

16 13. Venue is proper in this District under 28 U.S.C.
17 § 1400 (b), because Defendants are incorporated and thus
18 resides in this District.

PARTIES

Plaintiff

14. Plaintiff, Island and Sunghill Cafe is a upcoming
15 start-up corporation with its principle place of business
16 in San Jose, California. Plaintiff develops edible culinary art
17 artwork masterpieces for consumption and distribution
18 in the form of food/desserts, small appetizers, and coffee
19 beverages.

20 15. Founded in 2017, The Island and Sunghill Cafe
21 seeks to provide culinary diversity by transforming the

1 Defendant is responsible for the operation of its state prisons
2 and the care and custody of prisoners incarcerated and held
3 in its custody.

4 19. Defendant, County of Sacramento ("County")
5 is a California governmental agency with its principle
6 place of business in California. Defendant is responsible
7 for the operation of its two county jails, the "Main Jail"
8 located in downtown Sacramento, and the Rio Corrumpes
9 Correctional Center ("RCC") located in a rural area
10 of Elk Grove, California.

11 20. Defendant, Deonna Patterson is a California
12 Psychologist who resides in California with her
13 principle place of business JTC SI "I" ST. Sacramento,
14 California. Defendant is responsible for the operation
15 of the Main jail's Psychiatric Services, and care of
16 patients in the main jail's care.

17 21. Renata Pleshchuk Kowalski is a California
18 medical doctor who resides in California with her principle
19 place of business in California. Defendant is responsible
20 for the mental health care of prisoners incarcerated and
21 held in the care of CDCR.

22 22. Defendants have sought to compete with Plaintiff
23 with ingredients and products that closely resemble,
24 and allegedly taste, smell, and feel like Plaintiff's coffee-based
25 beverages and food.

26 23. Plaintiff brings this action for damages and
27 injunctive relief to protect its innovative culinary
28 art, coffee-based beverages and food products against

1 global food and coffeehouse beverage system. To do this, it
2 creates delicious, nutritious, affordable, and sustainable
3 coffee beverages and food products. Plaintiff's innovative approach
4 to food science and culinary arts, powered by Oppostify
5 Research and patent protected material, has allowed it to develop
6 coffee-based beverages and food in a competing industry
7 that recreates the entire sensory experience of drinking coffee
8 beverages and eating delicious food products. Plaintiff
9 has invested countless time in the research and development
10 of these market-leading coffee beverages and food products
11 and has secured patent and copyright material covering its
12 innovative ingredients, food and beverage products
13 and manufacturing processes.

14 Defendants

15 16. Defendant, Dunk'n LLC is a California subsidiary
with its principle place of business in Canton
Massachusetts. Defendant advertises itself as a provider
of coffee-based beverages, ingredient systems, and
finished formulations of coffee-based beverages.

17 18. Defendant, Starbucks Inc. is a California
corporation with its principle place of business at
2401 Utah Avenue South, Seattle Washington. Defendant
advertises itself as a provider of coffee-based beverages,
ingredient systems, and finished formulations of coffee-based
beverages.

19 20. Defendant, California Department of Corrections
and Rehabilitation ("CDCR") is a California governmental
agency with its principle place of business in California.

1 Defendant's patent infringement.

2 FACTUAL ALLEGATIONS

3 19. ROBERT EUGENE ROTAS is the founder, and owner of the
 4 Island and Sugar Hill Inc.. While Plaintiff was arrested
 5 in September 2017 and detained at the Santa Clara County Jail
 6 while Plaintiff was incarcerated Plaintiff sought Rehabilitation,
 7 and formulated a series of business plans and manuscripts
 8 (attached as exhibit C) to plan for the future and to break the cycle
 9 of mass recidivism. In May of 2019 Plaintiff was transferred
 10 to the California Department of Corrections and Rehabilitation to serve
 11 a 5 year, 4 month prison term. While serving his state Prison
 12 sentence Defendants officers, employees, agents, attorneys, and (or)
 13 instrumentalities seized all Plaintiff's manuscripts and
 14 business plans and began to make copies, trade, sell, and use them
 15 without Plaintiff's permission.

16 20. In June of 2021 Plaintiff was transferred to the Sacramento
 17 County Jail at which time, again, Defendants officers,
 18 employees, agents, attorneys, and (or) instrumentalities seized all
 19 of Plaintiff's business plans and manuscripts, and refused
 20 to return them back to Plaintiff.

21 21. In August 2021 Defendants officers, employees, agents,
 22 attorneys, and (or) instrumentalities gave away Plaintiff's
 23 manuscripts and business plans to another inmate.

24 22. In September 2021 Defendant Deanna Patterson
 25 received a copy of Plaintiff's manuscripts and business
 26 plans. Instead of returning them when Plaintiff requested
 27 them back Defendant Patterson sold, traded, used and
 28 gave away Plaintiff's manuscripts and business plans without

1 Plaintiff Defendants.

2 23. Between April 2021 To November 2021 Plaintiff
3 Read advertisements by defendants DUNKIN DONUTS and STARBUCKS
4 INC. that advertised various coffee drinks and refreshments (attached as
5 exhibit) which Resembled the same components as the coffee
6 drinks and refreshments in Plaintiff's patent and copyrighted food menu
7 (business plan attached as exhibit).

8 24. In 2022 Plaintiff sent a cease and
9 desist letter to Defendant DUNKIN and STARBUCKS INC. (attached
10 as exhibit), whom Defendants failed to respond to.

11 25. Defendant is and has been aware that inclusion of
12 coconut milk and fruit flavored assortment syrups in its coffee
13 and use of copyrighted coffee drinks and refreshments is a violation
14 of Plaintiff's patent and copy Rights.

15 26. Defendant is directly infringing, literally under the
16 doctrine of equivalents, Plaintiff's patent, and is therefore liable
17 under 35 U.S.C. §271 (2)

18 27. Defendant infringes the patent and copyrights because
19 it makes, uses, sells, and/or offers for sale the Plaintiff's coffee
20 beverage invention and other drink beverages on its food menu.

21 28. Defendant contributes to infringement of the patent
22 under 35 U.S.C. §271 (c) inasmuch as it provides a component
23 of Plaintiff's coffee beverages and other drink beverages, e.g. coconut
24 milk and various fruit flavored syrups and natural flavors,
25 which constitutes a material part of Plaintiff's coffee beverage inventions
26 and coffee beverages and other beverages from its menu, to methods
27 including the same to be especially made or specially adapted for use in
28 infringement of Plaintiff's coffee beverages and beverages on its

1 menu.

2 29. Defendant actively encourages its business partners
3 to make, use, sell, and (or) offer for sale Plaintiff's coffee
4 beverage invention and various beverages off its menu.
5 Defendant is aware of Plaintiff's proprietary. Despite such
6 knowledge Defendant has actively induced its business partners to
7 make, use, sell, and (or) offer for sale the Plaintiff's invention
8 in a way that constitutes infringement. Defendant has encouraged
9 this infringement with specific intent to cause its business
10 partners and customers to infringe. Defendant's acts thus constitute
11 active inducement of patent infringement in violation of 35
12 U.S.C. §271 (b).

13 30. Defendant's direct infringement, contributory infringement
14 and inducement of infringement have irreparably harmed Plaintiff.

15 31. Pursuant to 35 U.S.C. 284 Plaintiff is entitled to damages
16 adequate to compensate for Defendant's infringement.

17 32. Defendant's infringement has been and is willful and,
18 pursuant to 35 U.S.C. §289 Plaintiff is entitled to treble damages.
19 Defendant's willful infringement is based at least on Defendant's knowledge
20 of Plaintiff's and, its manufacturing techniques, its products,
21 and its patents and copyrights. Defendant's conduct is egregious
22 as it has continued offering, selling, using, and (or) using
23 the infringing coffee beverages and various rice beverages off its
24 copyrighted menu, despite knowledge of the infringement.
25 Defendant has either willfully and wantonly infringing the
26 Patent or has recklessly avoided knowledge of Plaintiff's
27 own coffee beverages, various rice beverages, patents, and
28 copyrights.

1 33. This case is "exceptional" within the meaning
2 of 35 U.S.C. §285, and Plaintiff is entitled to an award
3 of attorney's fees.

4 II. Prayer for Relief

5 Wherefore Plaintiff demands Judgment as follows:

6 a. Judgment that Defendant has infringed as is infringing
7 the Patent B. That Plaintiff be granted injunctive Relief
8 against Defendant and its office employees agent Servant
9 attorneys instrumentalities and / or those in privity with them
10 to prevent the Recurrence of the Infringing activities
11 complained of herein, including Ceasing Manufacture, use,
12 Sale, offing, for Sales or importation of the Infringing
13 Patent ceasing Contribution to and / or involvement of
14 others to Do the same end for all further proper injunctive
15 Relief pursuant to 35 U.S.C. 283

16 c. Judgment that Defendant account for and pay to Plaintiff
17 all Damages and costs incurred by the Plaintiff, caused by
18 Defendant's infringing activities committed at herein;

19 d. Judgment that Defendant has willfully infringing Patent
20 and an increase in Damages award to Plaintiff up to
21 three times the amount assessed, pur. to 35 U.S.C. 284

22 e. That Plaintiff be granted pre- and - Judgment interest
23 on the Damages f. That this court declare this case exceptional
24 award Plaintiff reasonable attorney fees and in accordance
25 with 35 U.S.C. 285 and g. The Plaintiff be granted
26 Such other and further relief as the Court may Deem
27 Just and proper under the circumstances.

Business Plans

1. Cafe, Ice Cream Shop: The Island & Sugarhill Cafe. "Try Jh Taste of Italy"

2. Hair & Nail Salons Bonitas. "Enhance Jh Inner Beauty"

3. Spa, Sauna & Massage Parlor: Ecstasy falls. "A Sense of heaven"

4. Apartment Complex: Paradise Springs. "Heaven on Earth"

5. Adult Stores: 4ever U and Me. "Sexy lace & adult toys & intimate Caples"

6. Magazine Publications: Sweet or Tasty. "What's Jh flavor"

7. Porn Production Studios: Sticky & Smooth Media Prod
Entertainment.

8. Swinger Website: Sharing is Caring. "The Double Up horlage"

9. Casual Encounters, Platonic Website: Paging "keep it on the D.C."

10. Performance, Stats Blogs Run Down. "Check Me Out" or "Checkem Out"
what u working with

11. Record Label: Royal Red Records

12. Night Club: Gloco

13. Clothing Line: Saved up

14. female Brand: Baby Doll

15. Lingere Brand: Design or film "all J ever wanted" or "all J want~n~need"

16. Lip Gloss & Make Up line: Cuscious. "The Sweetest Thing"

17. Song Lyric Book #1: Royalty. "Kings ~n~ Queens of hip hop ~n~ R&B"

18. GPS Tracker for Kidnap, Missing Persons: SaveMe. Linked w/ Megans law
& all law enforcement Data Bases. Sends immediate alerts once activated.

19. Ticking Timer erase phone Data: Bombs Away Phone App.

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NC

The Island and Sugarhill Cafe

Name: The Island and Sugarhill Cafe.

Logo: Palm Tree w/ 3 Coconuts and icecream Cone w/ 3 Scoops of icecream.

Type: Cafe, Icecream Shop, Mixed ethnic DESERTS.

Model: franchise.

Second Level Management:

Quate Phrases: "a taste of Italy."

Board of Directors

- President, Chief Operating Manager.
- Regional Manager.
- Vice President.
- Store Manager
- Vice President, finance.
- Accountant.
- General Counsel

Competitors:

- Starbucks
- Petes Coffee
- Dunkin Donuts
- Dutch Bros
- Coffee Bean

Market Share Targets

- Bay Area
- New York
- Puerto Rico
- Central Valley
- Miami
- Dominican Republic
- Sacramento County
- Orlando
- Costa Rica
- Lake Tahoe
- Jamaica
- Brazil
- Reno
- Caribbean
- Italy

Layout Structures:

- Aquarium Built in wall
- Wall (water) fountains
- Suede Couches

Services

- Discount for law enforcement, medical workers, students
- Once a year charity Raffle
- App Ordering
- Weekend Wine Tasting
- Curbside Delivery
- home, business delivery

Menu:

Double or (Doppio): Double Shot "for the ultimate Pick Me Up"

Espresso Macchiato: Espresso topped with foamed milk

Espresso Con Panna: Espresso with whipped cream

Americano: Espresso with hot water added to make strong coffee

Cappuccino: One pulled shot of Espresso, with two thirds steamed milk topped with foam (8 oz cup). Two shots of Espresso, two thirds steamed milk topped with foam (12 oz, 16 oz cup)

Dry Cappuccino: One pulled shot of Espresso, no steamed milk, topped foam. (8 oz cup), 2 pulled shots of Espresso, no steamed milk, topped foam. (12, 16 oz cup).

Latte: One pulled shot espresso, seven/eighths steamed milk. (8 oz). Two pulled shots (16 oz).

Caffeccino: One pulled shot of Espresso, two parts steamed milk, 1 part foam milk

Cafe Au Lait: half coffee, half steamed milk.

Cafe Con Panna: One shot Espresso with whipped cream.

Mocha: One shot Espresso, Chocolate, Seven/Eighths Steamed milk, whipped cream.

Regular Steamed Milk, flavored Steamed Milk.

Coconut flavored Milk: fruit flavored Syrup, green herbal tea.

flavored shots: Coconut, Toffee, Caramel, Vanilla, Almond, Pistachio, Mint,

hazelnut, lime, cherry, watermelon, STRAWBERRY, Raspberry, orange, Boysenberry.

Egg Cream: Chilled 12 oz glass, half cup cold whole milk, Squirt one half cup seltzer until creamy head forms, Pour two spoons chocolate in stream through foam in thin stream. Insert long spoon in cup and stir without disturbing head.

Italian Soda: One-Ounce Syrup (flavored) with Mineral Water or Club Soda. Add half and half and Coconut Milk for creamy treat.

Granita

horchata: fruit flavored.

Cinnamon Rolls filipino Deserts

Charro's Vietnamese deserts

Plantains Indian deserts

Tiramisu Wine

angel wings

naugats

canoli

Cassata

Crostata

old fashion icecream with cones

Bannana Splits

Sundaes

Caramel apples

Caramel Popcorn

Kettle Corn

Sticky colored Popcorn

Cotton Candy

Donita's

names Donita's.

Logos

Type: Hair and Nail Salon.
Up

Model: Corporate franchise.

Quotation Phrases: "Enhance your Inner Beauty!"

Second Level Management:

Board of Director's

- President, Chief Operating Manager.
- Regional Manager.
- Vice President.
- Store Manager.
- Vice President, finance.
- Accountant.
- General Council.

Competitors:

- Sally's Beauty
-
-
-
-
-

Market Share Targets:

- Bay Area.
- New York.
- Puerto Rico
- Central Valley.
- Miami.
- Dominican Republic
- Sacramento County.
- Orlando.
- Costa Rica
- Reno.
- Jamaica.
- Brazil
- Las Vegas.
- Caribbean.
- Italy

Lay Out STRUCTURE:

- Wall Mirrors
- Suede Couches, Waiting Room
- Warming Massage Salon Chairs
- Beauty Supply Shelf

Services:

- Pedicures
- Shaves
- Manicures
- Hair Cuts
- Brazilian Waxes
- Tapers
- Hair coloring

Ethnic hair Styles

- Braids ◦ hair washing, nourishment care
- Dreads
- Twisters
- Extensions
- CRUCHE
- Weaves

nail Quality

- Designs
- longer lasting
- nail Removal

Stylists

- outgoing
- Enthusiastic
- Humorous
- Small talk instructions on hair care and nails.

◦ Ethnic products for Sale

◦ Hygiene Supplies for Sale

◦ nail products for Sale

Lcstacy falls

names Lcstacy falls.

Logo:

Type: Spa and Sauna Bath house.

Model: franchise Corporation.

Quotephrases "A Sense of Heaven.

Second Level Management:

Board of Director's

- President, Chief Operating Manager.
- Regional Manager.
- Vice President.
- Store Manager.
- Vice President, finance.
- Accountant.
- General Council.

Competitor's:

-
-
-
-
-
-

Market Share Targets:

- Bay Area
- Las Vegas • Puerto Rico
- Central Valley
- Miami • Dominican Republic
- Sacramento County
- Orlando • Costa Rica
- Reno
- Jamaica • Brazil
- Caribbean • Italy

Key Out STRUCTURE:

- Natural mineral water private Deep tubs.
- Water fountain.
- Deep Tub Rooms surrounded by Palm Trees.
- Individualise Private Rooms for each service.
- Deep tubs have small waterfall, dim light and incents.
- Wall MIRRORS in Deep tub Rooms, candle holder's.
- Palm TREES, flower's surrounding inside interior.

Services:

° fresh, natural mineral water private deep
Tubs infused with vitamins, Aloe, cherry blossom,
fruit/vegetable extract to promote healthy,
infoliating skin * hair nourishment Scented. flower Petals optional.

° Clean, warm, vitamin infused mud baths.

° Mud wraps.

° facials.

° Deep tissue massage, joint therapy.

° Sauna Room.

° Incense, aromatic candles upon Request.

° Small aperitizers, tea, wine.

Paradise Springs

Name: Paradise Springs

Logo:

Type: Apartment homes.

Model: Corporation, franchise.

Quotation Phrase: "Heaven on Earth."

Second Level Management:

Board of DIRECTOR's

- President, chief Operating Manager.
- Vice President.
- Vice President, finance.
- General Council
- Housing Developer
- Architecture Designer.

Competitors:

- Bay Area
- Central Valley
- Sacramento County
- Reno
- Las Vegas

Market Share Target:

- Miami - Dominican Republic
- Orlando - Costa Rica
- Jamaica - Brazil
- Caribbean - Italy
- Puerto Rico

Key Out STRUCTURE:

- Surveillance system, alarm system
- furnished.
- In-Room Jacuzzi's.
- Walk-In Shower with Digital Radio.
- Deep Tubs.
- On-Site Movie theater w/ PRIVATE Reflector glass Dark Beds.
- Garden, Pond, with fish.
- Day Care
- Gym

4ever J and Me

Names 4ever J and Me.

Logos

Type: ADULT STORE, Website.

Model: Corporation.

Quote Phrase: "Sexy Love lace and adult Toys for Intimate Couples"
"Be all that he DESIRES"

Second Level Management:

Board of Supervisors

- President, Chief Operating Manager.
- Vice President.
- Vice President, finance.
- General Council.
- Regional Manager.
- Store Manager.
- Accountant.

Competitor's:

- Seductions.
- Hustle Hollywood.
- Adam and Eve.
-

Market Share Targets:

- Bay Area.
- Central Valley.
- Sacramento County.
- Reno.
- Las Vegas.
- Puerto Rico.
- Miami.
- Dominican Republic.
- Orlando.
- Costa Rica.
- Jamaica.
- BRDPI.
- Caribbean.
- Italy.

Key Out Structure:

Merchandise:

- Baby Dolls.
 - Sex furniture
 - Gorgeous lingerie.
 - Sex Swing
 - Sexy G-Strings, Panty, Thong Sets.
 - Wall Mirrors
 - fishnets, stockings
 - Bed Drapes
 - edible Thong, Panty, G-STRING SETS.
 - Silk Sheets
 - Leggings
 - Fur Blankets
 - T-Panties
 - feather pillows
 - Leather Pants
- Body Suits
- Latex
- Costumes

Playfull afterhour accessories:

Sex games

- handcuffs
- whips & paddles
- Dildo's
- clit stimulators
- anal beads
- hormone spray
- Body oils
- Cube, pointments
- incents, candles
- adult books

Sweet

name Sweet.

Logo:

Type: Model Magazine Publication.

Model's Corporation.

Quate Phrase: "what's your flavor?"

Second Level Managements:

Board of Supervisors

- President, Chief Operating manager.
- Vice President.
- Vice President, finance.
- Vice President, marketing.
- Publisher.
- Accountant.
- General Counsel.
- Photographer.
- Hair Stylist.
- Makeup Artist.
- Clothing Designer.

Competitor's:

- ButtZ
- Show
- Smooth
- STRAIGHT STUNNING

Market Share Targets:

- International

Lay Out STRUCTURE:

Varies

• Island Resort

Model Types:

• Asian

• Russian

• Indian

• Latin

• Middle EASTERN

• Pacific Island

• Persian

• Caribbean

• Native Indian

• European

Adult Movie Titles:

1. Sliding Thru Asia
2. A Trip 2 Bang Cock
3. A Taste of India
4. 1 night India
5. Arabian Nights
6. The Hung Asian
7. The Dirty Russian
8. Border Brothers
9. German Exchange Students
10. Sex Ed with Mrs. Sanchez
11. Teaching Tina
12. How I Passed the Exit Exam
13. The Lawyer's Client
14. My Plea Deal
15. The Judge's Chamber's
16. Paralegal Duties
17. Mrs. Officer
18. The Strip Search
19. House Arrest
20. Dental Cream
21. The Ultimate Dental Care
22. My Physical with Dr. Long
23. My 1st Colon Exam
24. My 1st Prostate Exam
25. The Best Pap Smear ever
26. The Head Doctor
27. Love is Medicine
28. Love doesn't Discriminate
29. Daddy's Lil Girl
30. Cumming Daddy
31. Like Mother Like Daughter
32. Sister Sister
33. My Exes Best friend
34. I apologize for my husband's manners
35. The Plumber and the lonely housewife
36. Backyard Boogie
37. What's eating Sam?
38. Strange Noises next Door
39. The 3-way Call
40. Fuck me like a whore
41. Tales of the Booty Bandit
42. Return of the Booty Bandit
43. Cum 2 Me
44. In 2 Deep
45. BDK: Big Dick Kong
46. His cumming Miami
47. Jungle Fever
48. Roof Top Bang Out
49. You forgot the Sausage Pizza Boy
50. Wet Dreams
51. Lost in love
52. Can't Stop, won't Stop
53. Pippy long Stocking

Sliccy 69 Smooth Entertainment

name: Sliccy 69 Smooth (Media Production's) Entertainment.

Logo:

Type: Porn Production Studio.

model: Corporation.

Quote Phrases:

Second Level Managements

Board of Supervisors

- President, Chief Operating Manager.
- Hair Stylist
- Camera Women.
- Make-Up Artist.
- Photographer.
- Clothing Designer.
- Vice President, Marketing.

Competitors:

- BRAZZERS.
- BORDER BANG.
- INTERNATIONAL
- Bang Bros.
- Bangbus.
- Palon (fuck)shop.

Market Share Targets:

Lay Out Structure:

- Varies.

54. She was all	63. Pay the Piper
55. Whatever I Desire	64. Hot like fire
56. Tattoo, Tongue Rings, fancy Cars	65. The Dirty American
57. Hunting Snow Bunnies	66. Louis Theroux's Russia
58. ScREW you	67. Russia's inner warth
59. A Rough Time on the Job	68. Oh shi!! hold on...oh oh!!
60. Working hard	69. Pipe Dreams flex
61. Rain on me	70. Great movie of China
62. DRip DRop	71. Fuck Me Long Time
PLANES, TRAINS, Boats and Automobiles	Sweet Asia Asian Culture
72. Nurses v. School Teacher	75. G.I Jane v. Sailor
73. Cops v. firefighter	76. Love's Edge
74. Beautiful women v. flight attendants	77. Nudie Snacks and Private Parts

The ART of love Making: Sex Ed at it's finest

- ° Sex Techniques: STROKE speed, Motions and STROKE depth
- ° Vaginal and clit stimulation techniques
- ° Best oral techniques
- ° Sex positions
- ° Sex food and edible lingerie
- ° how to learn her body and perfect it's satisfaction
- ° Best foreplay, adult games and roleplay
- ° Best love, sex supplements and Body oils
- ° Best Sensors and Stimulators
- ° Best lubricants for comfortable smooth touch or tight

Sharing is Caring

Name: Sharing is Caring.

Logo:

Type: Swinger Date Site, Website.

Model: Corporation.

Quote Phrases: "Expose yourself to the SECRET world of fantasy, fetish and Desire." "Dial up HOTLINE 4 hot steamy couples."

Second Level Management:

- President, Chief Operating Manager.
- Vice President.
- Vice President, Finance.
- General Counsel.
- Accountant
- Limousine Driver.
- Hotel Manager
- Room Service Workers
- Hotel Security
- Adult Store Manager

Competitor's:

• Craigslist.

• BackPage.

•

•

Market Share Target:

• International.

Layout Structure:

• Discreet Motel

• Surrounded by Beautiful Landscape Scenery.

• In-Room Jacuzzi

• fully furnished Rooms (Romanticised)

Sex Furniture

• Wall and ceiling MIRRORS.

• Private Balcony, and Roof Top

• Garden, Pond, Stream, Waterfall.

• Adult Store

Services:

- Discreet Booking
- Discreet Limousine Service
- On-Site Security and Surveillance System.
- food, Adult Product, Bottle Service
- free lube and condoms
- WiFi

Paging

Name: Paging.

Logo:

Type: Casual Encounters Date Site, Website.

Model: Corporation.

Quote Phrase: "Keep it on the D.C."

Second Level Managements

Board of Directors

- President, Chief operating manager.
- Accountant.
- Limousine Driver.
- Vice President.
- Hotel Manager.
- Vice President, finance.
- Hotel Security.
- General Counsel.
- Adult Store Manager.

Competitors:

- Craigslist.
- International.
- BackPage.
-
-
-
-

Market Share Target

Key Out Structure:

Varies. Part of Sharing is Caring website.

Royal Red Records

Name: Royal Red Records.

Logo: R.R.R

Type: Record label.

Model: Corporation.

Quatre Phrases:

Second Level Managements:

Board of Supervisor

- President, Chief operating manager.
- General Counsel.
- Vice President.
- Accountant.
- Vice President, finance.
- Producer.
- Vice President, marketing.
- Manager, music studio

Competitors:

-
-
-
-
-

Market Share Targets:

- International.

Layout Structures:

- Varies.

Glow

Name: Glow.

Logo:

Type: Club

Models: Franchise Corporation.

Quatre Phrases

Second Level Management:

Board of Supervisors

- President, Chief operating officer.
- Vice President.
- Vice President, finance.
- General Council.
- Accountant.
- Regional manager.
- Club Manager.
- Bartender's.
- Architecture designer.
- Security.

Competitors:

-
-
-
-
-
-

Market Share Targets:

- Bay Area.
- Central Valley.
- Sacramento County.
- Reno.
- Las Vegas.
- New York.
- Miami.
- Orlando.
- Jamaica.
- Puerto Rico.
- Dominican Republic.
- Costa Rica.
- Brazil.
- Caribbean.
- Italy.

Layout Structures:

- Pixi Glass Dancefloor, colorful fish beneath.
- Pixi glass spiral staircase with rushing water.
- Pixi Glass colorful Columns.
- Glow in DARK lights, black lights, large strobe lights.
- VIP rooms with pool tables, Jacuzzis, screen TVs, beds, mini bar and sectional couch.

Service:

- Waitresses, Bartender's in Lingerie.
- Bottle Service.
- Private Dancers upon order.
- Small food, appetizer's.

Employee Clothing Attires:

- Red Suits, white ties.
- White Suits, Red ties.
- Desire or fien lingerie.

Clothing Line

Male Brand Names Sewed up.

Logo: Doll with eyes crossed out.

Female Brand: Baby Doll.

Logo: Crown

Lingerie Brand Names Desire or fren.

Logo: Crown with heart

Quote Phrases: "all u ever wanted" "all u want and need"

Second Level Management

Board of Supervisors

- President, Chief Operating Manager.
- Designer.
- Vice President.
- Manufacturer.
- Vice President, Finance.
- General Counsel.
- Vice President, Marketing.
- Accountant.
- Regional Manager.

Designs:

- T-Shirt and Pants with artwork, Poem's, Quotes, Urban Style.
- Panty and BRA Set with Colorfull fruit designs, flowers.
- G-STRING, Thong BRA Set with colorfull fruit, ice cream, flowers.
- G-STRING, Thong, Panty BRA Set, See through
- G-STRING, Thong, Panty BRA, Leggings, Tank top with crown pattern and crown emblem. Bandana pattern. Puerto Rican, Mexican flag pattern. Sport Pattern's. Indian, Vietnamese, Filipino, Chinese flag pattern.

• Wallet with Chain.

Clothing Types:

- T-Shirt
- Tank Top
- Pants
- Leggings
- Thongs, G-Strings, Pantys, Boy Shorts
- Bras
- Lingerie
- Belts

Inventions

1. Muscle Relaxer anal Lube: Non-Sticky, light, smooth lube infused with Muscle Relaxer for more relaxed non-painful anal penetration.
2. Anal Douche, enzymes: cleanses anal cavities, flushes out system for clean comfortable, confident anal penetration.
3. Dildo filled with Lube: Dildo filled with lube. Small compartment to Refill dildo in hanging nut sack. Various sizes (8 inches to 12 inches), various widths. Lube released upon squeezing nut sack. Realistic skin feel, detailed thick muscle veins. Pulse Shaft (slightly inflated by pulsating). Warming, vibrating mechanism.
4. Light Stimulating Cream: light, smooth menthol type cream to give tingling a slight warm cooling sensation to stimulate sensitive intimate areas.
5. Vehicle Seat Dildo: Dildo attached to seat cover for hands-free discreet, private enjoyment while driving.
6. Hand Vibrator: hand with five fingers that vibrates with speeds, and flicking action.
7. Save me app GPS Device: GPS device connected to illegal and law enforcement Systems. GPS placed in ear rings, Rings, hair tie balls. Can be purchased by consenting adults, Monthly Payment Plan. Once activated sends signal alarm every 72 hours to cell phone. Can be turned off no problem, left on.

and reported in event there is a problem.

8. App Phone Tracker: App can be accessed from another phone. Allows a person to track, locate lost or stolen phone.

9. Bombs Away: Ticking Timer (Bomb icon) erases all data on phone.

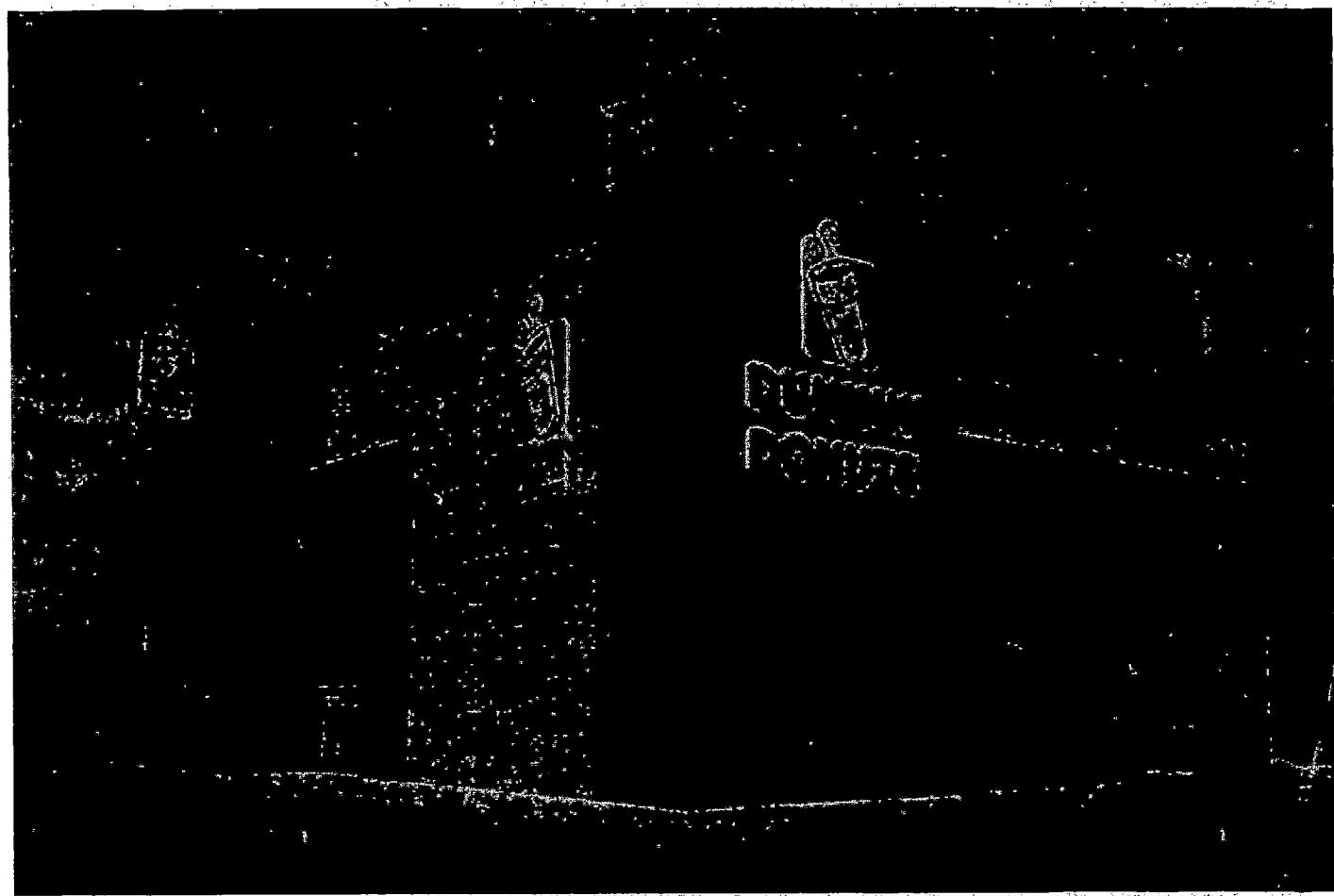
10. TV Program Translator: English or foreign language channels or movies automatically translated to preferred language in subtitles.

EDC/EK
63075



Home » Restaurants » Fast Food Menu & Prices » Dunkin' Donuts Menu With Prices

Dunkin' Donuts Menu With Prices



Are you in the mood of having a cup of coffee with a donut? If yes, then Dunkin' Donuts is the right place for you, but you don't want to go there without knowing their latest menu with prices. So in this article, I will tell you the latest Dunkin' Donuts menu prices.

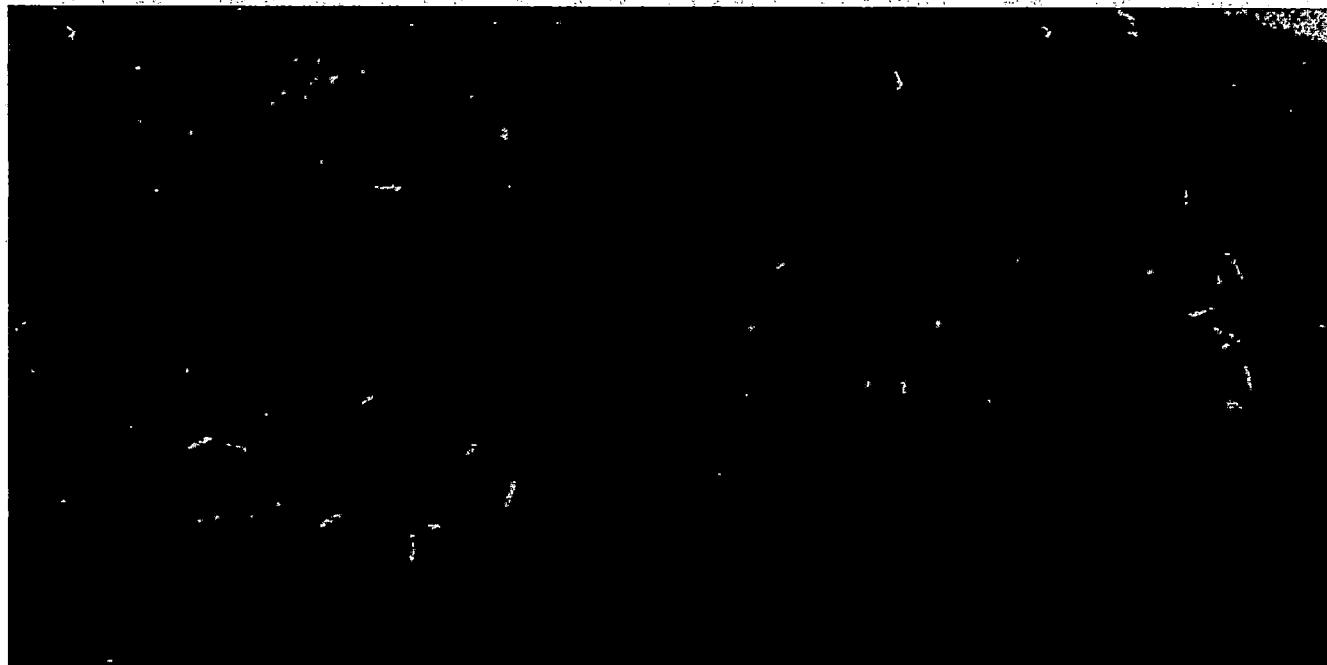
Dunkin' Donuts' menu is famous for donuts and bagels. They also serve premium beverages such as espresso, iced, hot and frozen drinks.

Case 2:22-cv-01602-DAD-KJN Document 1 Filed 09/12/22 Page 37 of 62
But the menu isn't the only thing I will tell you in this article. I will also tell you the franchising details, contact information and the nutritional breakdown of the items present on the Dunkin' Donuts menu. But before knowing all of this, let's check out the history of Dunkin' Donuts.

Dunkin' Donuts is an American-based multinational coffee house chain that William Rosenberg founded in 1950. The first store of Dunkin' Donuts was opened in Massachusetts, U.S. Dunkin Donuts is well-known for its coffee and baked products not only in the USA but in the whole world.

The stores are modern and provide a casual atmosphere for customers to enjoy their food. And the restaurants' products are fresh and served with a lovely smile. It is recognized for its loyalty because it has been operating for more than forty years now.

Dunkin' Donuts Menu Prices



Dunkin' Donuts' menu includes hot coffee, iced coffee, frozen treats, sandwiches, cakes, muffins, bagels, cookies, smoothies, and many more items. But the brand is really popular for its coffee and freshly baked donuts.

The store sells 22 types of donuts, 1 type of coffee, over a dozen coffee beverages to its customers.

You can choose from a macchiato, latte, espresso, cappuccino, dunkaccino, vanilla chai, hot tea and hot chocolate in coffee and plain, glazed chocolate, strawberry and vanilla frosted, Boston Kreme, glazed chocolate cake and many others in donuts.

Their bakery and breakfast sandwiches are highly popular among customers as well. The reason why Dunkin' Donuts has become such a market leader in the coffee and the donut industry is because of the freshness of their products and their loyalty to their customers.

Dunkin' Donuts menu prices are also very reasonable as compared to other coffee chains. So without waiting more, let's check out the latest Dunkin' Donuts menu with prices.

Espresso Drinks

Espresso Drinks	Small	Medium	Large
Latte	\$2.89	\$3.39	\$3.89
Iced Latte	\$3.39	\$3.89	\$4.19
Cappuccino	\$2.89	\$3.39	\$3.89
Iced Cappuccino	\$3.39	\$3.89	\$4.19
Macchiato	\$3.19	\$3.59	\$3.89
Iced Macchiato	\$3.59	\$4.09	\$4.39
Americano	\$2.49	\$2.89	\$3.19
Iced Americano	\$2.89	\$3.39	\$3.59



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Shot of Espresso	\$1.29
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Check out the official Starbucks menu with prices

Iced Drinks

Iced Drinks	Small	Medium	Large
Cold Brew Coffee	\$2.99	\$3.39	\$3.59
Iced Coffee	\$2.49	\$2.89	\$3.09
Iced Chai Latte	\$3.69	\$4.19	\$4.39
Iced Matcha Latte	\$3.59	\$4.19	\$4.49
Iced Tea	\$2.29	\$2.69	\$2.89

Dunkin' Refreshers

Dunkin' Refreshers	Small	Medium	Large
Purple Pomegranate Dunkin' Coconut Refresher	\$3.09	\$3.39	\$3.59
Pink Strawberry Dunkin' Coconut Refresher	\$3.09	\$3.39	\$3.59

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Frozen Drinks	Small	Medium	Large
Frozen Matcha Latte	\$3.69	\$4.69	\$5.19
Frozen Coffee	\$3.19	\$3.99	\$4.79
Frozen Chocolate	\$3.19	\$4.19	\$4.99
Coolatta	\$3.19	\$3.99	\$4.79

Also, read the [official Bottle Blue Bottle Coffee](#)

Sandwiches & Wraps

Sandwiches & Wraps	Price
Grilled Cheese Melt	\$3.69
Grilled Ham & Cheese Melt	\$3.99
Sweet Black Pepper Bacon Sandwich	\$4.39
Wake-Up Wrap ® Sweet Black Pepper Bacon	\$2.39
Sourdough Breakfast Sandwich	\$5.39
Beyond Sausage ® Sandwich	\$4.49
Wake-Up Wrap ® Beyond Sausage ®	\$2.29
Egg and Cheese	\$2.99
Sausage Egg and Cheese	\$3.99
Bacon Egg and Cheese	\$3.99

Dunkin' Refreshers	Small	Medium	Large
Golden Peach Dunkin' Coconut Refresher	\$3.09	\$3.39	\$3.59
Blueberry Pomegranate Dunkin' Refresher	\$2.59	\$2.89	\$3.09
Strawberry Dragonfruit Dunkin' Refresher	\$2.59	\$2.89	\$3.09
Peach Passionfruit Dunkin' Refresher	\$2.59	\$2.89	\$3.09

Also, read the latest Juan Valdez menu

Hot Drinks

Hot Drinks	Small	Medium	Large	X-Large
Original Blend	\$2.09	\$2.39	\$2.59	\$2.79
Dunkin' Midnight	\$2.09	\$2.39	\$2.59	\$2.79
Sunrise Batch	\$2.09	\$2.39	\$2.59	\$2.79
Chai Latte	\$3.19	\$3.59	\$3.89	N/A
Matcha Latte	\$3.19	\$3.59	\$3.89	N/A
Tea	\$2.09	\$2.39	\$2.59	\$2.79
Hot Chocolate	\$2.49	\$2.69	\$2.89	\$3.09
Dunkaccino	\$2.49	\$2.69	\$2.89	\$3.09

Box O' Joe ®	\$17.99
Box O' Joe ® Hot Chocolate	\$19.99

Case 2:22-cv-01602-DAD-KIN Document 1 Filed 09/12/22 Page 42 of 62 **Sandwiches & Wraps** Price

Turkey Sausage Egg and Cheese	\$3.99
Ham Egg and Cheese	\$3.99
Power Breakfast Sandwich	\$4.99
Veggie Egg White Omelet	\$3.99
Wake-Up Wrap ® Ham Egg And Cheese	\$2.19
Wake-Up Wrap ® Sausage Egg And Cheese	\$2.19
Wake-Up Wrap ® Bacon Egg And Cheese	\$2.49
Wake-Up Wrap ® Turkey Sausage Egg And Cheese	\$2.19
Wake-Up Wrap ® Veggie Egg White and Cheese	\$2.09
Wake-Up Wrap ® Egg and Cheese	\$1.89
Hash Browns	\$1.25
Sweet Black Pepper Snackin' Bacon	\$2.49

Donuts & Bagels

Donuts & Bagels	Price
Donuts	\$1.30
Half Dozen Donuts	\$6.09
Dozen Donuts	\$9.49
Munchkins ® Donut Hole Treats	\$1.45
Bagels	\$1.49

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Donuts & Bagels

	Price
Bagel with Cream Cheese	\$2.89

Bakery & Snacks

Bakery & Snacks	Price
Ham & Cheese Rollups	\$3.00
Bacon & Cheese Rollups	\$3.00
Three Cheese Croissant Stuffer	\$3.49
Chicken, Bacon & Cheese Croissant Stuffer	\$3.49
Sweet Black Pepper Snackin' Bacon	\$2.49
Plain Stuffed Bagel Minis	\$2.49
Everything Stuffed Bagel Minis	\$2.49
Muffin	\$1.89
4 Muffins	\$5.99
Coffee Roll	\$1.89
Apple Fritter	\$1.89
Croissant	\$1.59
English Muffin	\$1.69
Hash Browns	\$1.25

Bottled Drinks

Bottled Drinks	Price
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Price

Bottled Drinks	Price
Bottled Drinks	\$2.19

Brew at Home

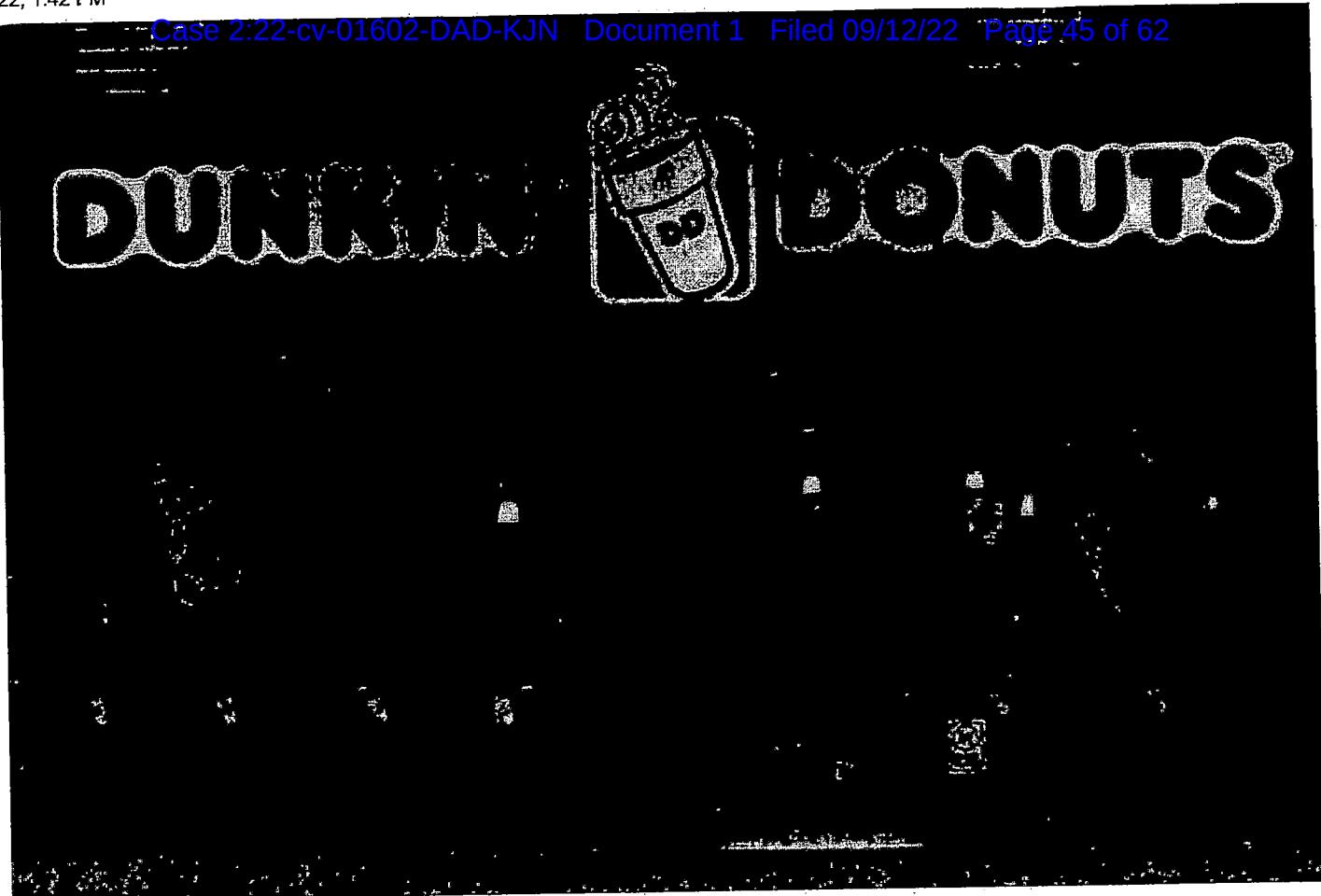
Brew at Home	Price
Packaged Coffee	\$8.89
K-Cup® Pods	\$8.99

Dunkin' Donuts Nutritional Information

Nutritional Information	<u>verywellfit.com/the-best-low-calorie-food-at-dunkin-donuts</u>
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To check the nutritional breakdown of the items present on the Dunkin' Donuts menu, you can visit the link mentioned above.

Dunkin' Donuts Franchise Details



Dunkin' Donuts has more than 200 locations all over the United States. The brand has expanded in states like Alabama, Georgia, Indiana, Kentucky, North Carolina, Ohio, Pennsylvania, South Carolina, Tennessee, and Virginia. So if you want to open a Dunkin' Donuts store, then this is how much it will cost you.

Name of Fee	Cost
Initial Franchise Fee	From \$40,000 to \$90,000
Building Costs	From \$19,500 to \$535,000
Site Development Costs	From \$0 to \$298,000
Additional Development Costs	From \$4,700 to \$82,500
Equipment, Fixtures and Signs	From \$25,000 to \$268,000
Electronic Cash Register / Retail Technology System	From \$16,000 to \$61,000

Name of Fee	Cost
Licenses, Permits, Fees and Deposits	From \$500 to \$5,500
Real Estate Costs	Varies
Opening Inventory	From \$4,000 to \$20,000
Miscellaneous Opening Costs	From \$9,500 to \$70,000
Uniforms	From \$0 to \$1,200
Insurance	From \$4,500 to \$16,000
Travel and Living Expenses While Training	From \$2,000 to \$35,000
Marketing Start-Up Fee	From \$0 to \$10,000
Additional Funds for First 3 Months of Operation	From \$0 to \$105,000
ESTIMATED TOTAL	From \$95,700 to \$1,597,200

Check out the official menu prices of Coffee Time

Dunkin' Donuts Contact Information

Dunkin' Donuts Corporate Office Address- 130 Royall St. Canton, MA 02021

Dunkin' Donuts Corporate Phone Number- 1-800-859-5339

Social Profiles

Facebook: <https://www.facebook.com/dunkinindia/>

Instagram: [instagram.com/dunkin/](https://www.instagram.com/dunkin/)

Case 2:22-cv-01602-DAD-KJN Document 1 Filed 09/12/22 Page 47 of 62
Twitter: twitter.com/dunkindonuts

LinkedIn: linkedin.com/company/dunkin-donuts/about

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There is a variety of in-house seating options, whether that is on the backless style bar by the windows or in one of their luxury velvet sofas that are reminiscent of the comfort of your own living room. Each location is designed with your comfort in mind. When your order is taken, you'll be asked for your name. This is then written on your cup and they'll call your order by name as and when it's ready; which really adds a personal touch. Starbucks prides itself on friendly, efficient, personable staff.

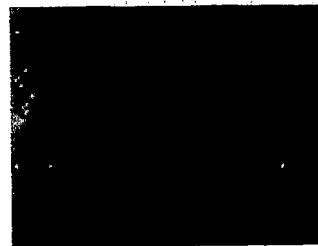
Sometimes, the waiting times can be a little longer than expected due to the chain's popularity, however, the staff do their upmost to keep their customers happy and the products are certainly worth the wait. Considering the price; they are a little more expensive than other comparable chains, with prices ranging from \$2 to \$6, dependent upon drink size and type. However, this is due to their commitment to providing fair standards to their suppliers and considering the quality of the products; it is an extra that customers have always been willing to pay.

Starbucks has held its place as one of the world's favorite coffee houses for over 40 years. Step into any of their locations today and you'll find outstanding coffee, quality products, cozy seating areas, friendly service and a fair price for everyone.

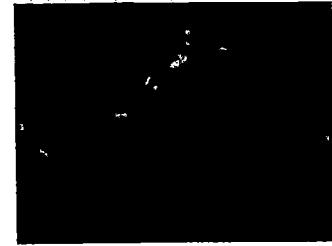
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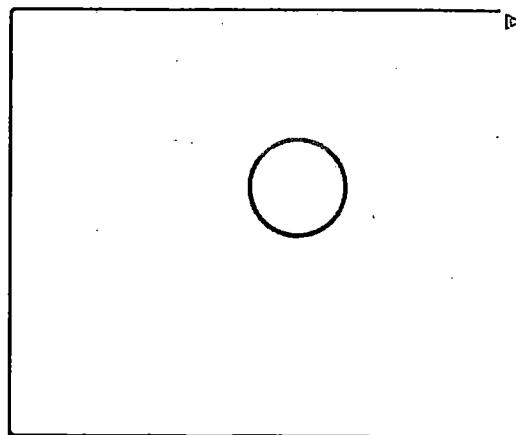


FOOD		SIZE	PRICE
Thai-Style Peanut Chicken Wrap (Limited Time)			\$5.95
Salted Caramel or Birthday Cake Pop			\$1.95
Salted Caramel or Birthday Cake Pop	2 Pcs.		\$3.50

History

The original Starbucks was opened in 1971, in Seattle, Washington by three friends: Jerry Baldwin, Zev Siegl and Gordon Bowker. The three had met at the University of San Francisco and decided to go into business after meeting coffee roasting extraordinaire Alfred Peet. The company began life as solely a coffee beans and coffee roasting equipment distribution shop; with the sale of brewed coffee coming in a few years after the initial opening.

During these first few years, the chain expanded at a fairly slow pace; between 1971 and 1986 the business grew to a modest 6 stores, all based in the Seattle area. However, in 1987 the trio made the decision to sell Starbucks to a former employee, Howard Schultz. Schultz already owned a chain of coffee shops and after purchasing the Starbucks brand he went on to rebrand all of his stores in keeping with the world renowned brand.



After the purchase Schultz immediately started the chain's global takeover. By 1989, there were 46 stores across various states in the US. Over the following decades; the company quickly engulfed the world, with Schultz buying up chain after chain of coffee houses and amalgamating them with the infamous Starbucks brand. The first international location was opened in Tokyo, Japan in 1996 and the first UK location was opened in 1998. The company now boasts a massive 23,450 locations worldwide.

One quality that stands out against their competitors is their commitment to fair trade and farmer equity practices. Each location is required to provide proof as to how much profit the farmers obtain from the sale of their beans, ensuring a fair price across the board. This commitment is an aspect of the business that has helped increase their popularity with customers; they care for the little man.

Review

FOOD		SIZE	PRICE
Pumpkin Cream Cheese Muffin (Limited Time)			\$2.95
Washington Apple Pound Cake (Limited Time)			\$2.95

All-Day Breakfast

Hearty Blueberry Oatmeal	\$3.45
Bacon & Gouda Breakfast Sandwich	\$3.75
Sausage & Cheddar Breakfast Sandwich	\$3.45
Spinach & Feta Breakfast Wrap	\$3.75
Reduced-Fat Turkey Bacon Breakfast Sandwich	\$3.75
Slow-Roasted Ham & Swiss on Croissant Bun	\$4.75
Double-Smoked Bacon, Cheddar & Egg on Croissant Bun (Limited Time)	\$4.75

Lunch & Anytime Snacks

Protein Bistro Box	\$5.25
Cheese & Fruit Bistro Box	\$4.95
Omega-3 Bistro Box	\$5.95
PB&J on Wheat Bistro Box	\$5.25
Turkey Rustico Panini	\$6.45
Turkey Pesto Panini	\$6.45
Ham & Swiss Panini	\$5.95
Chicken Santa Fe Flatbread	\$5.95
Chicken BLT Salad Deli Sandwich	\$5.95
Roasted Tomato & Mozzarella Panini	\$5.55
Chicken Artichoke Panini (Limited Time)	\$6.45

FOOD	Case 2:22-cv-01602-DAD-KJN Document 1 Filed 09/12/22 Page 51 of 62	SIZE	PRICE	(X)
Teavana® Shaken Iced Tea		Venti	\$2.65	
Teavana® Shaken Iced Tea		Trenta	\$2.95	
Teavana® Shaken Iced Peach Green Tea Lemonade		Tall	\$2.75	
Teavana® Shaken Iced Peach Green Tea Lemonade		Grande	\$3.25	
Teavana® Shaken Iced Peach Green Tea Lemonade		Venti	\$3.75	
Teavana® Shaken Iced Peach Green Tea Lemonade		Trenta	\$4.25	
Teavana® Shaken Iced Black Tea Lemonade		Tall	\$2.45	
Teavana® Shaken Iced Black Tea Lemonade		Grande	\$2.95	
Teavana® Shaken Iced Black Tea Lemonade		Venti	\$3.45	
Teavana® Shaken Iced Black Tea Lemonade		Trenta	\$3.95	
Evolution Fresh		Grande	\$5.95	

Bakery

Ham & Cheese Savory Foldover	\$3.45
Wheat Spinach Savory Foldover	\$3.45
Pepperoni & Tomato Savory Foldover	\$3.45
Cheese Danish	\$2.45
Butter Croissant	\$2.45
Chocolate Croissant	\$2.75
Blueberry Scone	\$2.45
Banana Nut Bread	\$2.75
Iced Lemon Pound Cake	\$2.45
Morning Bun	\$2.45
Chocolate Chip Cookie	\$1.95

FOOD		SIZE	PRICE
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Strawberries & Creme Frappuccino		Mini	\$3.75
Strawberries & Creme Frappuccino		Tall	\$3.95
Strawberries & Creme Frappuccino		Grande	\$4.45
Strawberries & Creme Frappuccino		Venti	\$4.95
Coffee Frappuccino		Mini	\$2.95
Coffee Frappuccino		Tall	\$3.25
Coffee Frappuccino		Grande	\$3.95
Coffee Frappuccino		Venti	\$4.45
Vanilla Bean Crème Frappuccino		Mini	\$2.95
Vanilla Bean Crème Frappuccino		Tall	\$3.25
Vanilla Bean Crème Frappuccino		Grande	\$3.95
Vanilla Bean Crème Frappuccino		Venti	\$4.45
Iced Caramel Macchiato		Tall	\$3.75
Iced Caramel Macchiato		Grande	\$4.45
Iced Caramel Macchiato		Venti	\$4.95
Salted Caramel Mocha Frappuccino (Limited Time)		Tall	\$4.25
Salted Caramel Mocha Frappuccino (Limited Time)		Grande	\$4.95
Salted Caramel Mocha Frappuccino (Limited Time)		Venti	\$5.25
Cool Lime or Very Berry Starbucks Refreshers™		Tall	\$2.95
Cool Lime or Very Berry Starbucks Refreshers™		Grande	\$3.45
Cool Lime or Very Berry Starbucks Refreshers™		Venti	\$3.95
Cool Lime or Very Berry Starbucks Refreshers™		Trenta	\$4.45
Teavana® Shaken Iced Tea		Tall	\$1.75

FOOD	Case 2:22-cv-01602-DAD-KJN Document 1 Filed 09/12/22 Page 53 of 62	SIZE	PRICE
Teavana® Oprah Cinnamon Chai Tea Latte		Venti	\$4.65
Flat White		Tall	\$3.75
Skinny Peppermint Mocha		Tall	\$3.95
Skinny Peppermint Mocha		Grande	\$4.65
Skinny Peppermint Mocha		Venti	\$4.95
Pumpkin Spice Latte (Limited Time)		Tall	\$4.25
Pumpkin Spice Latte (Limited Time)		Grande	\$4.95
Pumpkin Spice Latte (Limited Time)		Venti	\$5.25
Salted Caramel Mocha (Limited Time)		Tall	\$4.25
Salted Caramel Mocha (Limited Time)		Grande	\$4.95
Salted Caramel Mocha (Limited Time)		Venti	\$5.25
Toasted Graham Latte (Limited Time)		Tall	\$4.25
Toasted Graham Latte (Limited Time)		Grande	\$4.95
Toasted Graham Latte (Limited Time)		Venti	\$5.25

Frappuccino, Refreshers & Iced Coffee

Iced Coffee (with or without Milk)	Tall	\$2.25
Iced Coffee (with or without Milk)	Grande	\$2.65
Iced Coffee (with or without Milk)	Venti	\$2.95
Iced Coffee (with or without Milk)	Trenta	\$3.45
Caramel Frappuccino	Mini	\$3.75
Caramel Frappuccino	Tall	\$3.95
Caramel Frappuccino	Grande	\$4.45
Caramel Frappuccino	Venti	\$4.95
Mocha Frappuccino	Mini	\$3.75
Mocha Frappuccino	Tall	\$3.95



Espresso, Coffee & Tea

Caffe Latte	Tall	\$2.95
Caffe Latte	Grande	\$3.65
Caffe Latte	Venti	\$4.15
Caffe Mocha	Tall	\$3.45
Caffe Mocha	Grande	\$4.15
Caffe Mocha	Venti	\$4.65
White Chocolate Mocha	Tall	\$3.75
White Chocolate Mocha	Grande	\$4.45
White Chocolate Mocha	Venti	\$4.75
Freshly Brewed Coffee	Tall	\$1.85
Freshly Brewed Coffee	Grande	\$2.10
Freshly Brewed Coffee	Venti	\$2.45
Cinnamon Dolce Latte	Tall	\$3.65
Cinnamon Dolce Latte	Grande	\$4.25
Cinnamon Dolce Latte	Venti	\$4.65
Skinny Vanilla Latte	Tall	\$3.45
Skinny Vanilla Latte	Grande	\$4.15
Skinny Vanilla Latte	Venti	\$4.65
Caramel Macchiato	Tall	\$3.75
Caramel Macchiato	Grande	\$4.45
Caramel Macchiato	Venti	\$4.75
Caramel Flan Latte	Tall	\$3.75
Caramel Flan Latte	Grande	\$4.55
Caramel Flan Latte	Venti	\$4.75

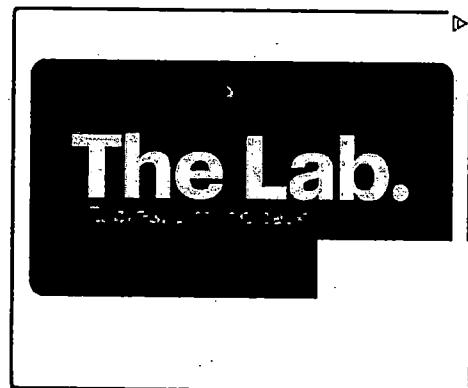




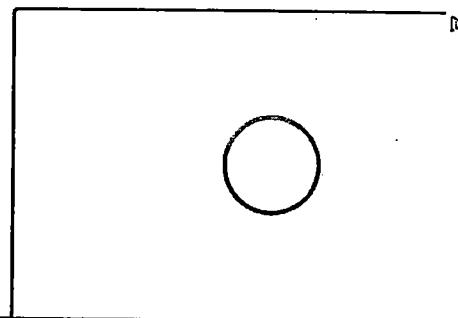
≡ Menu

Starbucks Menu Prices

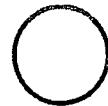
Starbucks is an American institution, an icon among coffee chains and houses. They are well known for their selection of specialty coffees, although they also serve a range of: cold drinks, teas, fresh juices, snacks and sandwiches.



The chain is popular because of their quality products, homely feel and dedication to providing the friendliest service around. Their continued commitment to providing quality products and caring customer service has guaranteed their position of one of the world's favorite coffee houses.



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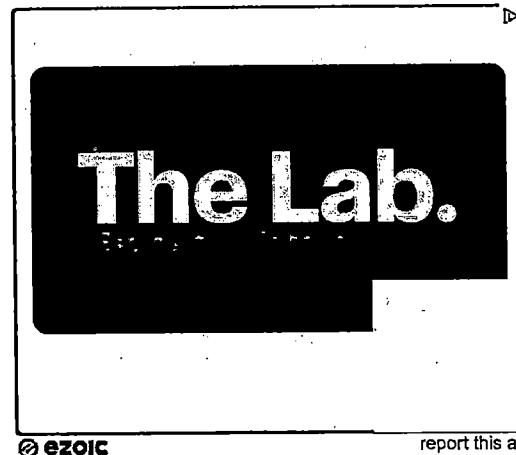
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Disclaimer

All attempts are made to provide up to date pricing information. However prices and menu offerings can vary by location and time of the day. Hence please consider prices to be estimated prices. RealMenuPrices.com is an independent site and is not associated with or are affiliates of any restaurants food chains or entity listed on the site.



1 PATENT CEASE AND DESIST LETTER
2

3 THE ISLAND AND SUGAR HILL CAFE

4 ROBERT G. ROJAS #5307536

5 651 6TH ST.

6 SACRAMENTO, CA 95814

7 DUNKIN' DONUTS

8 DAVID HOFFMAN

9 130 ROYALL ST.

10 CANTON, MA 02021

11 Dear MR. Hoffman

12 We have recently discovered that your business is using the drink, dessert,

13 and/or commodities [Coconut Milk Refreshers; Coconut Milk Herbal Green Tea]

14 and sweet foam] as edible products. We believe your use of said edible products

15 at your business infringes upon our ownership of the patent and copyright.

16 We learned of your use of the same or similar name and product on May 2021. We

17 discovered your use of the name and product after the theft of our business

18 plans by law enforcement; we noticed your business advertising them in various

19 commercials. We believe we have the exclusive right to use this name and product

20 for the following reasons:

21 1. We were the first ones to create the name and product.

22 2. We have poor man copyrights and no organized record of the name and product.

23 3. We created the name and product in 2017 prior to the theft with the

24 intent on use. We have therefore established priority in the name and product.

1 because our use of the name and product precedes your use.

2 4. Since 2017 we have possessed ownership of the name and product to
3 include detailed descriptions of the unique Recipe's outlined in our
4 business plans.

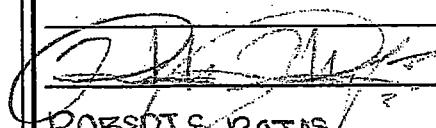
5 5. We exhausted lots of resources and time in the creation of the name and
6 product, to include extensive amounts of research in the formation of
7 our business model, STRUCTURE, food, drink and dessert menu.

8 Because you are using the same or similar name on the same or similar products,
9 we believe your use of the name and product will cause confusion among
10 our consumers and is likely to consistently cause customer confusion in the
11 future.

12 while the purpose of this letter is to open a dialogue between us, please be
13 advised that we are prepared to take all actions necessary to protect our
14 name and product. You have infringed on our name and product. You must
15 cease and desist any use of our name and product. Furthermore, you should
16 sign the statement below certifying that you will cease using the name and
17 product. We recommend that you consult with an attorney before taking any
18 action.

19 If you have any questions concerning this letter, please feel free to contact me.

20
21 My Regards,

22 
23 ROBERT S. ROJAS

24 THE ISLAND AND SUGARHILL CAFE

25
26
27 I, DAVID HOFFMAN, personally, and on behalf of, Dunkin' Donuts, agree to
28 immediately cease and desist any and all further use of the foregoing

1 name's and products:

2 (1) Coconut milk refreshers.

3 (2) Coconut milk herbal tea.

4 (3) Sweet foam.

5 If I or my company breach this agreement, ROBERT S. RIGAS, shall be entitled

6 to all costs, including attorney's fees, related to any and all claims or actions

7 brought to enforce this agreement and Robert S. Rigas shall be free to pursue

8 all rights it has as of the date of this letter. I certify that I have the authority

9 to enter into this agreement on behalf of myself and Dunkin' Donuts.

10
11
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13
14 Signature of DAVID HOFFMAN CEO DUNKIN' DONUTS
15
16
17 DATE
18
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27
28

January 17, 2022

NOTICE TO CEASE AND DESIST

ROBERT LUCAS ROJAS
CHIEF EXECUTIVE OFFICER
THE ISLAND AND SUGARHILL CAFE
651 "I" ST.
SACRAMENTO, CA. 95814

STARBUCKS COFFEE LEGAL DEPARTMENT
2401 UTAH AVENUE SOUTH, MAILSTOP 5X54
SEATTLE, WA. 98134

January 24, 2022

Dear Mr.

We enter by extending our utmost respect in full, in hopes that upon receiving receipt of this it finds you well. Mr. [REDACTED] it has been determined by us that you are currently using a beverage derived primarily from the use of two main ingredients to include, (1) Coconut Milk, and (2) Coffee without our authorization which is a patented consumable food and/or beverage invention in accordance with Title 11 of the U.S. Code.

We were first alerted of our products unauthorized use by your food franchise chain in April, 2021, upon reviewing commercials made by you guys advertising our food and beverage product, specifically 'Coconut Milk' Coffee, to potential customers.

We believe we hold rights to the use of said product because we created the business plan for our Company through extensive research and study, in which we developed the primary ingredients for our food and beverage product invention in 2017, that we intended on its use by incorporating it into our food franchise chain.

for Sale To our consumers.

On or between 2019 and 2021 copies of our business plan and model were illegally seized and stolen without our permission. Accordingly, we demand that you immediately remove our product from your menu and cease any further use, advertising, promoting, and (or) marketing of our product, including any and all other infringements. Any further use of our product will confuse and mislead our consumers, as to who originally invented and owns rights to the product.

We, furthermore, demand that you immediately cease the use and distribution of the product, and any and all material including written or electronic copies, audio, and photographic images. That you destroy all such material immediately and that you desist from this or any other infringements of our rights in the future. We request an affirmative response from you indicating that you have fully complied with these requirements. In the event that you fail to agree and comply to our cease and desist notice we are prepared to take any and all legal remedies available to rectify the circumstances, if any, we are placed in.

Thank you for your time and consideration on behalf of this matter. We look forward to hearing from you soon.

Sincerely yours truly,



ROBERT EUGENE ROJAS
CHIEF EXECUTIVE OFFICER
THE ISLAND AND SUGARHILL CAFE

Robert.Rojas.0505@gmail.com