Keywords: **35 U.S.C. §101, abstract idea, user interface**

General: **Claim limitations reciting a specific manner of displaying information in a computer user interface are an improvement to the functioning of computers and are not directed to an abstract idea.**

Core Wireless Licensing S.A.R.L. v. LG Electronics, Inc.
United States Court of Appeals for the Federal Circuit
No. 2016-2684, 2017-1922
Decided: January 25, 2018

I. Facts

Core Wireless Licensing S.A.R.L. ("Core Wireless") was issued U.S. Patent No. 8,434,020 ("the '020 patent") and U.S. Patent No. 8,713,476 ("the '476 patent") in 2013 and 2014, respectively. Each patent teaches improved display interfaces, particularly for electronic devices with small screens (e.g., cell phones). The improved interfaces include application summary windows for each application that may be accessed by a user without having to actually launch the application of interest. Claim 1 of the '476 patent, representative of the asserted claims, reads:

> 1. A computing device comprising a display screen, the computing device being configured to display on the screen a menu listing one or more applications, and additionally being configured to display on the screen an application summary that can be reached directly from the menu, wherein the application summary displays a limited list of data offered within the one or more applications, each of the data in the list being selectable to launch the respective application and enable the selected data to be seen within the respective application, and wherein the application summary is displayed while the one or more applications are in an un-launched state. (Emphasis added).

Core Wireless sued LG Electronics, Inc. ("LG") in the Eastern District of Texas alleging infringement of dependent claims 8 and 9 of the '476 patent, each of which depend from claim 1 recited above, and infringement of dependent claims 11 and 13 of the '020 patent.

In response, LG argued invalidity of the asserted claims under 35 U.S.C. § 101, anticipation in view of U.S. Patent No. 6,415,164 ("Blanchard"), and non-infringement. Specifically, LG asserted that the claims were directed to an abstract idea of an index under § 101. The district court held that the claims were not directed to an abstract idea, because the concepts recited in the claims are specific to devices like computers and cell phones. The district court also noted that even if the claims were directed to an abstract idea, they would be patent eligible, because they pass the machine-or-transformation test. Regarding anticipation and noninfringement, a jury found all asserted claims infringed and not invalid. LG's motions for judgment as a matter of law regarding anticipation and noninfringement were also denied. LG appealed to the Federal Circuit.

II. Issues

1) Did the district court err in determining the asserted claims to not be directed to an abstract idea under 35 U.S.C. § 101?
2) Did the district court err in determining the asserted claims to not be anticipated under 35 U.S.C. § 102?
3) Did the district court err in finding the asserted claims infringed?

III. Discussion

1. No, the Federal Circuit found that the district court correctly determined the asserted claims to not be directed to an abstract idea. Under the step one analysis of *Alice*, the Federal Circuit first examined several recent § 101 cases.[1] Each case provides examples of claims that focus on various improvements of systems.

Regarding the present claims, the Federal Circuit determined that, "[l]ike the improved systems claimed in *Enfish*, *Thales*, *Visual Memory*, and *Finjan*, [the present] claims recite a specific improvement over prior systems, resulting in an improved user interface." In particular, the court held that the "claims are directed to an improved user interface for computing devices…these claims are directed to a particular manner of summarizing and presenting information in electronic devices." Furthermore, the "limitations disclose a specific manner of displaying a limited set of information to the user, rather than using conventional user interface methods to display a generic index on a computer." The court also examined the specification of the '020 patent, which identified some deficiencies of the prior art and the specific improvements in the disclosed invention. Ultimately, the court held that "the claims are directed to an improvement in the functioning of computers, particularly those with small screens," and therefore, not to an abstract idea.

2. No, the Federal Circuit found that a reasonable jury could have determined the asserted claims to not be anticipated by Blanchard based on the evidence presented.

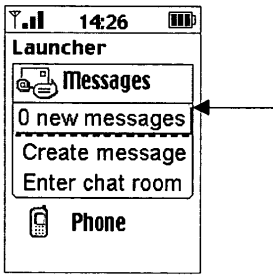
3. No, the Federal Circuit concluded that the district court correctly found the asserted claims to be infringed by LG.

IV. Conclusion

The Federal Circuit ruled that the district court did not err in finding the asserted claims to not be directed to an abstract idea, as the asserted claims are directed to an improved user interface for computing devices. Specifically, the court held the claims to be directed to a particular manner of summarizing and presenting information in an electronic device user interface.

V. Appendix

Example of an "application summary window" from the '020 and '476 patents:



[1] *See Finjan, Inc. v. Blue Coat Systems, Inc.*, 2018 WL 341882 (Fed. Cir. Jan. 10, 2018); *Visual Memory LLC v. NVIDIA Corp.*, 867 F.3d 1253 (Fed. Cir. 2017); *Thales Visionix Inc. v. United States*, 850 F.3d 1343 (Fed. Cir. 2017); *Enfish, LLC v. Microsoft Corp.*, 822 F.3d 1327 (Fed. Cir. 2016).