



Mobile Device Data Monitoring Patent Not Directed to Abstract Idea Under § 101

Oct 28, 2015

Reading Time : **1 min**

By: Daniel L. Moffett

Defendant, Zoho Corp., filed a summary judgment motion, arguing that the '740 Patent was invalid under § 101, because it was directed to an abstract idea and fails to disclose any technological advance. Specifically, Zoho argued that the '740 Patent claims are directed to “the disembodied idea of using symbols on a display to represent external information and updating these symbols as that information changes.”

Plaintiff countered that at the time the '740 Patent was issued, the growth of mobile device usage led to a corresponding increase in the demand for rich information content; however, the inevitable space constraints on mobile devices “limit[ed] the richness of information content available to a user.” The '740 Patent, as plaintiff argues, had “the specific technical objective of allowing status updates to be displayed more efficiently within the limited display screen of a mobile phone, pager, PDA or similar mobile device.”

In his holding, Judge Sparks held (without reasoning) that the '740 Patent “does not embody an impermissibly abstract idea. Therefore, the court need not determine whether the claims contained an inventive concept sufficient to transform the allegedly abstract idea into patent-eligible subject matter.”

Versata Software, Inc. et al v. Zoho Corp., 1:13-cv-00371 (W.D. Tex. October 26, 2015, Order) (Sparks, J.).

Categories

District Court

35 U.S.C. § 101

© 2025 Akin Gump Strauss Hauer & Feld LLP. All rights reserved. Attorney advertising. This document is distributed for informational use only; it does not constitute legal advice and should not be used as such. Prior results do not guarantee a similar outcome. Akin is the practicing name of Akin Gump LLP, a New York limited liability partnership authorized and regulated by the Solicitors Regulation Authority under number 267321. A list of the partners is available for inspection at Eighth Floor, Ten Bishops Square, London E1 6EG. For more information about Akin Gump LLP, Akin Gump Strauss Hauer & Feld LLP and other associated entities under which the Akin Gump network operates worldwide, please see our Legal Notices page.