IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

PAYGEO, LLC, Plaintiff, v. SAMSUNG ELECTRONICS CO., LTD., and SAMSUNG ELECTRONICS AMERICA, INC., Defendants.	Civil Action No. 2:25-cv-00334-RWS-RSP **JURY TRIAL DEMANDED**

DEFENDANTS' MOTION FOR JUDGMENT ON THE PLEADINGS PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 12(C)

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I. INTRODUCTION

Pursuant to Federal Rule of Civil Procedure 12(c), Samsung Defendants respectfully move to dismiss Plaintiff PayGeo's Complaint asserting infringement of claims of U.S. Patent Nos. 8,554,671 ("'671 patent") (Ex. A); 10,796,296 ("'296 patent") (Ex. B); 10,937,018 ("'018 patent") (Ex. C); 11,087,307 ("'307 patent") (Ex. D); and 12,014,347 ("'347 patent") (Ex. E).

The Asserted Patents all generally relate to a mobile payment platform "for executing financial transactions." *E.g.*, '347 patent, 4:15-20, 4:31-35.[1] The platform "enables members to transfer, receive, or otherwise exchange cash . . . in a mobile telecommunications environment." *Id.*, 4:31-35. Each of the patents is directed to aspects of this platform, including authenticating users through one or more user-selectable security levels for access to a mobile device application ('347 patent); saving payment methods for use in an electronic wallet ('296, '018, and '307 patents); carrying out financial transactions between users of the payment platform ('296, '018, '307, and '671 patents); and/or combinations thereof ('296, '018, and '307 patents). The Asserted Claims of the Asserted Patents are ineligible for patenting under 35 U.S.C. § 101 because they are directed to abstract ideas and do not recite any inventive concepts.

At step one of the Supreme Court's *Alice* framework, the '347 patent claims are directed to the abstract idea of authenticating a user for access to a mobile device application. These types of authentication-related claims have been consistently held ineligible under § 101 by the Federal Circuit and district courts, citing, for example, the Federal Circuit's decision in *Universal Secure Registry LLC v. Apple Inc.*, 10 F.4th 1342 (Fed. Cir. 2021). Similarly, the claims of the '296, '018, and '307 patents—all of which are substantially identical for the purpose of this briefing—are

[1] All five Asserted Patents share a common specification. For simplicity, this brief only cites a single specification when collectively addressing all Asserted Patents, unless otherwise necessary.

directed to the abstract ideas of establishing an electronic wallet and using that wallet for a financial transaction. These types of claims have been likewise consistently held ineligible under § 101 by the Federal Circuit and district courts, citing, for example, the Federal Circuit's decision in *cxLoyalty, Inc. v. Maritz Holdings Inc.*, 986 F.3d 1367 (Fed. Cir. 2021). And finally, the claims of the '671 patent fare no differently. Those claims are directed to the abstract idea of facilitating a financial transaction between two mobile devices. The Supreme Court, Federal Circuit, and this Court have consistently found that similar "claims directed to the performance of certain financial transactions [are directed to] abstract ideas." *E.g.*, *Content Extraction & Transmission LLC v. Wells Fargo Bank, Nat'l Ass'n*, 776 F.3d 1343, 1347 (Fed. Cir. 2014); *Integrated Tech. Sys., Inc. v. First Internet Bank of Ind.*, No. 2:16-CV-00417-JRG-RSP, 2017 WL 631195, at *4 (E.D. Tex. Jan. 30, 2017), *report and recommendation adopted*, 2017 WL 617673 (E.D. Tex. Feb. 15, 2017), *aff'd*, 712 F. App'x 1007 (Fed. Cir. 2018). And as to step two, each of the claims for the Asserted Patents lacks any "element or combination of elements that is 'sufficient to ensure that the patent in practice amounts to significantly more than a patent upon the [ineligible concept] itself.'" *Alice Corp. v. CLS Bank Int'l*, 573 U.S. 208, 217-18 (2014) (alteration in original) (citation omitted).

Resolving eligibility on the pleadings "conserve[s] scarce judicial resources," "provides a bulwark against vexatious infringement suits," and "provide[s] the most efficient and effective tool for clearing the patent thicket, weeding out those patents that stifle innovation." *Ultramercial, Inc. v. Hulu, LLC*, 772 F.3d 709, 718-19 (Fed. Cir. 2014) (Mayer, J., concurring). The Asserted Claims are invalid under § 101, and the Complaint should be dismissed with prejudice.

II. NATURE AND STAGE OF PROCEEDINGS

On April 2, 2025, Plaintiff filed its Complaint for patent infringement, accusing Samsung Defendants of infringing the Asserted Patents. D.I. 1. Plaintiff's infringement contentions were served August 25, 2025 (Ex. H), and a scheduling conference is set for September 8, 2025

(D.I. 32). Plaintiff accuses Samsung Defendants of infringing claims 1-3, 22, and 24 of the ’671 patent, claims 1-2, 4, 6-9, 11 and 13-14 of the ’296 patent, claims 1-2, 4, 6-9, 11 and 13-14 of the ’018 patent, claims 1-2, 4, 6-9, 11 and 13-14 of the ’307 patent, and claims 1-3, 5-8 and 10 of the ’347 patent. Ex H.

III. STATEMENT OF THE ISSUE

Abstract ideas are ineligible for patentability under 35 U.S.C. § 101, absent an inventive concept that amounts to significantly more than the abstract idea. The claims of the Asserted Patents are directed to abstract ideas. The Asserted Patents do not include an inventive concept beyond those ideas. Should the Court therefore dismiss Plaintiff’s claims pursuant to Rule 12(c)?

IV. STATEMENT OF THE FACTS

The common specification of the Asserted Patents details the historical use of cash in financial transactions, starting with “coins that were minted circa 700-550 BC,” through practices developed by “[t]he Ancient Levantines,” to the development of “[p]aper money” by “the Tang and Song dynasties” in China. ’347 patent, 2:54-3:18. The Asserted Patents note that more recently, “while the digitization of credit and debit transactions is increasingly expanding by means of computerization and networking, cash remains one of the last hurdles toward full conversion to a true electronic wallet that replaces the actual wallet.” *Id.*, 3:50-54. Thus, according to the Asserted Patents, “there still remains an unsatisfied need for a new system, method, and associated service (‘system’) that enable the consumers to transfer, receive, or otherwise exchange cash amongst themselves and the merchants.” *Id.*, 3:66-4:2.

The Asserted Patents allege that the “present invention satisfies this need,” disclosing a “system, method, network, and associated service . . . for executing financial transactions.” *Id.*, 4:15-23. The alleged invention “provides a platform that enables members to transfer, receive, or otherwise exchange cash and digital currency . . . in a mobile telecommunications environment.”

Id., 4:31-35. The Asserted Patents address different aspects of using this platform for financial transactions. The '347 patent claims methods and systems for "securely accessing a local application on a mobile device." *Id.*, 24:20-21, 24:50-51. The '296, '018, and '307 patents claim systems and methods of establishing an electronic wallet via interfaces on a mobile device application and then using that wallet for carrying out a financial transaction via the same mobile device application. '296 patent, 24:2-25:54, 26:8-28:16. And the '671 patent claims "[a] financial service method that provides a cashless platform of enabling users to perform a financial transaction in a mobile environment." '671 patent, 23:40-42; *see also id.*, 26:1-34 (system claim).

A. The User-Selectable Authentication Patent ('347 Patent)

According to the '347 patent, a mobile device user downloads a mobile application to a conventional mobile device. '347 patent, 10:32-36; *see also id.*, 1:60-2:3. Once downloaded, "[t]he user may then start . . . by setting up the desired security level or levels for the user [within the application]." *Id.*, 10:36-39. The "user has the option to select at least one of four security levels." *Id.*, 10:40-41. These levels include "a user-selected password 322"; "a voice recognition password, signature, or template 323"; "a user-selected fingerprint 324"; and/or "a user DNA sample 325." *Id.*, 10:40-50.

The '347 patent allegedly claims the concept of using more than one method of authentication before allowing access, which is commonly known as "multifactor authentication." Asserted claim 6 is shown below, with the focus of the claim further emphasized:

> 6. A system for securely accessing a local application on a mobile device, comprising the steps of:
>
> a hardware processor on a mobile device; and
>
> a local application on the mobile device and configured to be executed by the hardware processor, ***the local application including a first interface enabling a user to set a desired security level configuration setting in the local application for the mobile device***, the desired security level configuration setting establishing whether

> the local application requires a single security level or a plurality of security levels before allowing access to at least a feature in the local application, ***the local application including a second interface requiring, before allowing access to the at least one feature of the local application, the user to perform an authentication process based on the desired security level configuration setting***, the authentication process including only a single security level scan when the desired security level configuration setting is set to a single security level, the authentication process including a plurality of security level scans when the desired security level configuration setting is set to a plurality of security levels.

Id., 24:50-25:5 (emphases added).

B. The Electronic Wallet Patents ('296, '018, and '307 Patents)

Asserted claim 1 of the '296 patent is directed to a system for establishing an electronic wallet and using that electronic wallet to carry out financial transactions using only generic computing hardware on a mobile payment platform. '296 patent, 24:2-25:54. As shown by Exhibits F and G, claim 1 of the '296 patent is very similar to claim 1 of the '018 patent, which is in turn very similar to claim 1 of the '307 patent. Thus, for the purpose of this analysis, claim 1 of the '296 patent is treated as representative of the independent claims for the '018 and '307 patents. Claim 1 of the '296 patent is shown below, with the core steps for creating an electronic wallet and using that wallet in commerce further emphasized:

> 1. A system, comprising:
>
> memory storing program code associated with a service provided by a third-party entity to a plurality of members who register with the service provided by the third-party entity, the program code including a first communication interface configured to communicate with a first device associated with a credit card company on behalf of the plurality of members, the program code including a second communication interface configured to communicate with a second device associated with a financial institution on behalf of the plurality of members, the program code including a third communication interface configured to communicate with a third device associated with the third-party entity; and
>
> one or more hardware processors configured to execute the program

code to cause the system to perform a process of:

providing ***a login interface requesting security credentials*** from a first member of the plurality of members before the first member can access the service, the first member having previously registered with the service;

receiving particular security credentials from the first member;

when the particular security credentials have been validated, presenting ***one or more interfaces configured to assist the first member to register a set of one or more payment sources for a future transaction***, the one or more interfaces configured to assist the first member to register a credit card account issued by the credit card company in the set of one or more payment sources, the one or more interfaces configured to assist the first member to register a financial account associated with the financial institution in the set of one or more payment sources, the third-party entity being different than the financial institution and different than the credit card company;

presenting ***one or more interfaces configured to enable the first member to select a function identifier from a set of function identifiers***, each function identifier of the set of function identifiers configured to navigate to a respective function, ***a particular function identifier of the set of function identifiers configured to navigate to a payment function***, the payment function configured to assist the first member to request sending a payment amount to a payee account, the payee account being a third-party account associated with the third-party entity and belonging to a second member of the plurality of members, the second member having previously registered with the service;

receiving selection by the first member of the particular function identifier configured to navigate to the payment function;

after receiving the selection of the particular function identifier, presenting ***one or more interfaces configured to enable the first member to select a payee identifier identifying the payee account***;

receiving selection by the first member of the payee identifier;

presenting ***one or more interfaces configured to enable the first member to select a payment source identifier*** from a set of one or more payment source identifiers, the set of one or more payment source identifiers identifying a particular set of one or more payment sources, each payment source identifier of the set of one or more payment source identifiers identifying a respective payment source of the particular set of one or more payment sources, the program code capable of presenting in the set of one or more payment source identifiers a financial account identifier identifying the financial

account associated with the financial institution, a credit card identifier identifying the credit card account issued by the credit card company, and a third-party account identifier identifying a third-party account associated with the third-party entity and belonging to the first member;

receiving identification of a particular payment source identifier of the set of one or more payment source identifiers, the particular payment source identifier identifying a particular payment source of the particular set of one or more payment sources;

presenting ***an interface configured to enable the first member to identify the payment amount to be transferred to the payee account***;

receiving information from the first member of the payment amount;

selecting the first communication interface as a particular communication interface and establishing a communication link between the first communication interface and the first device associated with the credit card company on behalf of the first member, when the particular payment source is the credit card account issued by the credit card company;

selecting the second communication interface as the particular communication interface and establishing a communication link between the second communication interface and the second device associated with the financial institution on behalf of the first member, when the particular payment source is the financial account associated with the financial institution;

selecting the third communication interface as the particular communication interface and establishing a communication link between the third communication interface and the third device associated with the third-party entity, when the particular payment source is the third-party account;

requesting electronic transfer of the payment amount from the particular payment source to the payee account using the selected particular communication interface;

generating a notification indicating the electronic transfer to the payee account; and

transmitting the notification over a communication network to a computing device associated with the second member in real time, so that the second member has immediate access to up-to-date electronic transfers to the payee account.

Id., 24:2-25:54 (emphases added).

C. The Financial Transaction Patent ('671 Patent)

Asserted claim 24 of the '671 patent is directed to a platform for facilitating a financial transaction between two mobile devices. '671 patent, 26:1-34. Claim 24 is shown below, with each of the steps for executing the financial transaction further emphasized:

> 24. A computer program product that provides a cashless platform for enabling users to perform a financial transaction in a mobile environment, the computer program product comprising:
>
> ***a module embedded in a first user mobile station to enter financial information related to the financial transaction***;
>
> a module embedded in the first user mobile station to ***generate a code containing the financial information***, wherein the first user mobile station is in proximity to a second user mobile station;
>
> a module embedded in the first user mobile station to ***transfer the generated code to a second user mobile station*** by means of a directional movement on the first user mobile station in the direction of the second user mobile station;
>
> the first user mobile station further ***transmitting the generated code to a mobile transaction platform to confirm the executability of the financial transaction***;
>
> a module embedded in the second user mobile station automatically recognizing the transferred code;
>
> based on the recognized code, a module embedded in ***the second user mobile station determines whether to accept or decline the financial transaction***;
>
> wherein when the financial transaction is accepted by the second user mobile station, the mobile transaction platform executes the financial transaction;
>
> wherein when the financial transaction is declined by the second user mobile station, the mobile transaction platform prevents the execution of the financial transaction; and
>
> a module embedded in the second user mobile station to ***transmit a reverse code to the first user mobile station, to confirm whether the financial transaction was either accepted or declined*** by the second user mobile station.

Id. (emphases added).

V. LEGAL STANDARDS

A. Rule 12(c)

In the Fifth Circuit, Rule 12(c) motion standards are the same as Rule 12(b)(6) motion standards. *Hacienda Recs., L.P. v. Ramos*, 718 F. App'x 223, 227 (5th Cir. 2018) (citing *Guidry v. Am. Pub. Life Ins. Co.*, 512 F.3d 177, 180 (5th Cir. 2007)). Under Rule 12(b)(6) of the Federal Rules of Civil Procedure, a party may move to dismiss a complaint that fails to state a claim upon which relief can be granted. Fed. R. Civ. P. 12(b)(6). To survive a Rule 12(b)(6) motion, a complaint "must provide the plaintiff's grounds for entitlement to relief—including factual allegations that when assumed to be true 'raise a right to relief above the speculative level.'" *Cuvillier v. Taylor*, 503 F.3d 397, 401 (5th Cir. 2007) (citation omitted). Although factual allegations are taken as true, legal conclusions are given no deference—those matters are left for the court to decide. *See Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (tenet that allegations are taken as true on a motion to dismiss "is inapplicable to legal conclusions"). "[W]hen the allegations in a complaint, however true, could not raise a claim of entitlement to relief [as a matter of law], 'this basic deficiency should . . . be exposed at the point of minimum expenditure of time and money by the parties and the court.'" *Cuvillier*, 503 F.3d at 401 (citation omitted).

B. 35 U.S.C. § 101

Patent eligibility under § 101 "is a question of law" that "may be, and frequently has been, resolved on a Rule 12(b)(6) . . . motion where the undisputed facts, considered under the standards required by that Rule, require a holding of ineligibility under the substantive standards of law." *SAP Am., Inc. v. InvestPic, LLC*, 898 F.3d 1161, 1166 (Fed. Cir. 2018) (collecting cases).

To determine whether a patent claims an abstract concept, courts engage in the two-step inquiry set forth in *Alice*, 573 U.S. at 217-18. First, courts determine whether the claims at issue are "directed to" an abstract idea. *Id.* at 217. "[S]tep one presents a legal question" only, which

"does not require an evaluation of the prior art or facts outside of the intrinsic record." *CardioNet, LLC v. InfoBionic, Inc.*, 955 F.3d 1358, 1372, 1374 (Fed. Cir. 2020). This analysis often begins "with an examination of eligible and ineligible claims of a similar nature from past cases." *Amdocs (Isr.) Ltd. v. Openet Telecom, Inc.*, 841 F.3d 1288, 1295-99 (Fed. Cir. 2016). "In cases involving software innovations, this inquiry often turns on whether the claims focus on 'the specific asserted improvement in computer capabilities . . . or, instead, on a process that qualifies as an "abstract idea" for which computers are invoked merely as a tool.'" *Finjan, Inc. v. Blue Coat Sys., Inc.*, 879 F.3d 1299, 1303 (Fed. Cir. 2018) (quoting *Enfish, LLC v. Microsoft Corp.*, 822 F.3d 1327, 1335-36 (Fed. Cir. 2016)).

If the claims are directed to an abstract idea, the inquiry proceeds to step two. At step two, the court determines whether the claim elements, individually or collectively, add "significantly more" to the abstract idea—something "inventive"—that is "sufficient to 'transform' the claimed abstract idea into a patent-eligible application." *Alice*, 573 U.S. at 224 (quoting *Mayo Collaborative Servs. v. Prometheus Lab'ys, Inc.*, 566 U.S. 66, 72-73, 79 (2012)). "Stating an abstract idea 'while adding the words "apply it"' is not enough for patent eligibility. Nor is limiting the use of an abstract idea 'to a particular technological environment.'" *Id.* at 223 (first quoting *Mayo*, 566 U.S. at 72; and then quoting *Bilski v. Kappos*, 561 U.S. 593, 610-11 (2010)). Nor can claims simply recite "generic functional language to achieve [the] purported solutions" without claiming "*how* the desired result is achieved." *Two-Way Media Ltd. v. Comcast Cable Commc'ns, LLC*, 874 F.3d 1329, 1339 (Fed. Cir. 2017) (citation omitted).

Whether an asserted patent is invalid for failure to satisfy § 101 "is a question of law based on underlying facts that may be resolved on a Rule 12(b)(6) motion when the undisputed facts require a holding of ineligibility." *Athena Diagnostics, Inc. v. Mayo Collaborative Servs., LLC*,

915 F.3d 743, 749 (Fed. Cir. 2019) (internal citations omitted). Although the step two inventiveness inquiry may occasionally involve "underlying issues of fact," *Berkheimer v. HP Inc.*, 881 F.3d 1360, 1365 (Fed. Cir. 2018), a factual dispute arises only if the claims themselves capture the alleged inventiveness or are directed to an allegedly inventive concept contained in the specification, *id.* at 1369-70.

VI. ARGUMENT

A. The '347 Patent Is Ineligible Under 35 U.S.C. § 101

1. *Alice* Step One: Claim 6 Is Directed to the Abstract Idea of Authenticating a User for Access to a Mobile Device Application

Claim 6 is directed to authenticating the user of an application on a conventional mobile device, including "the steps of" (1) "enabling a user to set a desired security level configuration setting in [a] local application for [a] mobile device"; and (2) "before allowing access to the at least one feature of the local application, [enabling] the user to perform an authentication process based on the desired security level configuration setting." '347 patent, 24:50-25:5. These steps are carried out using "a hardware processor," "a first interface," and "a second interface." *Id.* And, according to the claim, "the authentication process include[s] only a single security level scan when the desired security level configuration setting is set to a single security level" and "a plurality of security level scans when the desired security level configuration setting is set to a plurality of security levels." *Id.* The representative asserted claim is thus directed to the abstract idea of authenticating a user for access to a mobile device application.

The Federal Circuit has consistently reached a similar conclusion for similar claims directed to authentication. As the Federal Circuit explained, "[i]n cases involving authentication technology, patent eligibility often turns on whether the claims provide sufficient specificity to constitute an improvement to computer functionality itself." *Universal Secure Registry*, 10 F.4th

at 1346. In *Universal Secure Registry*, the claims were "directed to an electronic ID device that includes a biometric sensor, user interface, communication interface, and processor working together to (1) authenticate the user based on two factors—biometric information and secret information known to the user—and (2) generate encrypted authentication information to send to the secure registry through a point-of-sale device." *Id.* at 1352. The Federal Circuit found that the claims "recite 'conventional actions in a generic way'—e.g., authenticating a user using conventional tools and generating and transmitting that authentication—without 'improv[ing] any underlying technology.'" *Id.* (alteration in original) (citation omitted). Because of this, the Federal Circuit concluded that the claims are directed to "the abstract idea of collecting and examining data to enable authentication." *Id.*

And *Universal Secure Registry* is far from an outlier among Federal Circuit cases considering authentication-related claims. *See, e.g.*, *Ericsson Inc. v. TCL Commc'n Tech. Holdings Ltd.*, 955 F.3d 1317, 1326 (Fed. Cir. 2020) ("Based on the claim language, we conclude that claims 1 and 5 are directed to the abstract idea of controlling access to, or limiting permission to, resources."); *In re AuthWallet, LLC*, No. 2022-1842, 2023 WL 3330298, at *4 (Fed. Cir. May 10, 2023) (affirming that an authentication-related "'security' feature would not render the claims non-abstract 'for the same reason that the patents in *Universal Secure Registry* were found to speak to abstract ideas'" (citations omitted)); *Prism Techs. LLC v. T-Mobile USA, Inc.*, 696 F. App'x 1014, 1016-17 (Fed. Cir. 2017) (finding claims reciting "systems and methods that control access to protected computer resources by authenticating identity data" are directed to the abstract idea of "providing restricted access to resources" (citation omitted)).

As another district court explained, "to the extent that [Patent Owner's] claim is directed at using multiple authentication methods for information security, this Court joins several other

courts, including the Federal Circuit, in concluding that the claim is directed to an abstract idea." *Peoplechart Corp. v. Wintrust Bank, N.A.*, 543 F. Supp. 3d 594, 601 (N.D. Ill. 2021) (citation omitted); *see also Smart Authentication IP, LLC v. Elec. Arts Inc.*, 402 F. Supp. 3d 842, 853 (N.D. Cal. 2019) (finding that the asserted claims are "directed to the abstract idea of verifying the identi[t]y of a user in more than one way over multiple communications mediums").

At its core, the '347 patent claims are directed to controlling access to resources, such as applications on a mobile device. As the Plaintiff alleges in the Complaint, the '347 patent claims are directed to, in part, "enabling secure access to local applications on the mobile device and to features within the local applications by assigning one or more registered security levels." D.I. 1 ¶ 41. But "[c]ontrolling access to resources is exactly the sort of process that 'can be performed in the human mind, or by a human using a pen and paper,' which [the Federal Circuit has] repeatedly found unpatentable." *Ericsson*, 955 F.3d at 1327 (citation omitted); *see also Universal Secure Registry*, 10 F.4th at 1353 (affirming the finding that "verifying the identity of a user to facilitate a transaction is a fundamental economic practice that has been performed at the point of sale well before the use of POS computers and Internet transactions"). "In each of these circumstances, as in the claim[] at issue, a request is made for access to a resource, that request is received and evaluated, and then the request is either granted or not." *Ericsson*, 955 F.3d at 1327. And "limit[ing] the abstract idea to a particular environment—a mobile telephone system—[ ] does not make the claims any less abstract for the step 1 analysis." *Id.* (alterations in original) (citation omitted); *see also Fraud Free Transactions LLC v. Ping Identity Corp.*, No. 24-1218-GBW, 2025 WL 1235194, at *6 (D. Del. Apr. 29, 2025) (finding that claim directed to multifactor authentication and reciting "'a choice of a plurality of authentication actions to be undertaken by

the user[’] . . . does not negate the fact that the claim involves nothing more than abstract mental processes” (citation omitted)), *appeal filed*, No. 25-1830 (Fed. Cir. June 3, 2025).

Plaintiff contends that “[t]he ’347 Patent improves the security of access to local applications on a mobile device . . . by enabling a user to use a biometric scan as a type of security credential; to register and store one or more security credentials on a mobile device; and to designate one or more security credentials to provide access to applications and its features on a mobile device.” D.I. 1 ¶ 42. But these allegations, even if taken as true, are insufficient to transform the claims into a patent-eligible concept. It is not enough to require authentication, including biometric authentication. *See Universal Secure Registry*, 10 F.4th at 1352. And the claims do not address the storage of security credentials—much less how such storage operates. As discussed above, “[i]n cases involving authentication technology, patent eligibility often turns on whether the claims provide sufficient specificity to constitute an improvement to computer functionality itself.” *Id.* at 1346. Claim 6 of the ’347 patent does not recite limitations directed to the improvement of computer functionality itself.

2. *Alice* Step Two: Claim 6 Includes No Inventive Concept and Instead Recites Only Conventional Components Used in Routine Ways

Claim 6’s invocation of conventional components does not transform the claimed subject matter into patent-eligible subject matter. When the abstract steps of authenticating a user for access to a local application are stripped away from claim 6, all that remains are the claimed “mobile device,” “hardware processor,” “local application,” “first interface,” and “second interface.” ’347 patent, 24:50-25:5. But these are nothing more than conventional components used in conventional ways.

According to the ’347 patent, “mobile devices” include “smart phones” and “smart pads.” *Id.*, 4:64-67. Neither the ’347 patent nor the Complaint alleges that the “mobile device” is anything

other than conventional. *See, e.g.*, *id.*, 1:60-2:3 (detailing how mobile devices were known). The '347 patent specification fails to even recite a "hardware processor," highlighting that it is not anything more than a conventional component used in a conventional way. The '347 patent discloses that "the term 'interface' includes a hardware, a software, a service, and/or a computer program product that is typically embedded within, or installed on a computer, a server, or otherwise a dedicated auxiliary device. Alternatively, the interface can be saved on a removable storage medium." *Id.*, 10:5-11. But nothing in the '347 patent suggests that the claimed interfaces are anything more than conventional.

Like the claims in *Universal Secure Registry*, claim 6 "do[es] not recite a new authentication technique, but rather combine[s] nonspecific, conventional authentication techniques in a non-inventive way. There is nothing in the specification suggesting, or any other factual basis for a plausible inference (as needed to avoid dismissal), that the claimed combination of these conventional authentication techniques achieves more than the expected sum of the security provided by each technique." 10 F.4th at 1355. "Using well-known computer technology to authenticate a user – even using multiple electronic media to do so – amounts to functional use of familiar technology and is not inventive." *Smart Authentication*, 402 F. Supp. 3d at 853.

In the Complaint, Plaintiff contends—in a conclusory fashion—that "[t]he claims of the '347 [p]atent . . . provide a novel multi-level security platform for securing access to local applications and its features on a mobile device that is highly secure and efficient to the end user." D.I. 1 ¶ 43. But novelty "does not avoid the problem of abstractness." *Simio, LLC v. FlexSim Software Prods., Inc.*, 983 F.3d 1353, 1364 (Fed. Cir. 2020) (citation omitted). And nothing in the Asserted Patent suggests any "improvement in the functioning of a computer." *Enfish*, 822 F.3d at

1338. Instead, "[t]he claims recite well-known and conventional ways to perform authentication . . . , concepts that are not inventive." *In re AuthWallet*, 2023 WL 3330298, at *4.

Plaintiff further contends that the claims "provide[] a non-generic and specialized system for collecting, registering, and storing biometric information for use in security settings on a mobile device and its applications." D.I. 1 ¶ 43. But none of this is recited in the claims—or even the specification. And any inventive concept must be "in the claims," not in unclaimed "technological details set forth in the patent's specification." *Intell. Ventures I LLC v. Symantec Corp.*, 838 F.3d 1307, 1322 (Fed. Cir. 2016); *see also Universal Secure Registry*, 10 F.4th at 1352 ("There is no description in the patent of a specific technical solution by which the biometric information or the secret information is generated, or by which the authentication information is generated and transmitted."). Regardless, collecting, registering, and storing biometric information in a conventional way is not inventive. *See Elec. Power Grp., LLC v. Alstom S.A.*, 830 F.3d 1350, 1355 (Fed. Cir. 2016) ("Merely requiring the selection and manipulation of information . . . by itself does not transform the otherwise-abstract processes of information collection and analysis." (internal citations omitted)).

3. The Other '347 Patent Claims Are Likewise Ineligible

Much like the representative claim discussed above, the other asserted independent claim and all asserted dependent claims are "substantially similar in that they recite little more than the same abstract idea." *Content Extraction*, 776 F.3d at 1348. These claims rely on conventional components or functionality, including conventional methods of authentication, and fail to transform the abstract idea into more. While certain claims "may have a narrower scope than the representative claims, no claim contains an 'inventive concept' that transforms the corresponding claim into a patent-eligible application of the otherwise ineligible abstract idea." *Id.* at 1349, 1351.

For example, the remaining claims require "wherein the single security level scan includes a request for a password" (claims 2, 7); "wherein the plurality of security level scans includes a biometric scan" (claims 3, 8); and "wherein the biometric scan includes a thumbprint" (claims 5, 10). The specification likewise explains that the claimed security levels may include "a user-selected password," "a voice recognition password," and "a user-selected fingerprint." '347 patent, 10:40-48. But "[t]here is nothing in the specification suggesting, or any other factual basis for a plausible inference (as needed to avoid dismissal), that the claimed combination of these conventional authentication techniques achieves more than the expected sum of the security provided by each technique." *Universal Secure Registry*, 10 F.4th at 1353; *Smart Authentication*, 402 F. Supp. 3d at 853 ("Using well-known computer technology to authenticate a user – even using multiple electronic media to do so – amounts to functional use of familiar technology and is not inventive."). "The [dependent] claims recite well-known and conventional ways to perform authentication . . . , concepts that are not inventive." *In re AuthWallet*, 2023 WL 3330298, at *4.

The remaining claims are ineligible where, as here, "all the claims are 'substantially similar and linked to the same abstract idea.'" *Content Extraction*, 776 F.3d at 1348 (citation omitted). Whether taken alone or in combination, these limitations do not provide significantly more than the abstract idea. Accordingly, as each of the claims lacks an inventive concept, no amendment of the Complaint can save Plaintiff's claims from a finding of ineligibility under § 101.

B. The '296, '018, and '307 Patents Are Ineligible Under 35 U.S.C. § 101

1. *Alice* Step One: Claim 1 Is Directed to the Abstract Ideas of Establishing an Electronic Wallet and Using That Wallet for a Financial Transaction

Claim 1 of the '296 patent is directed to a series of user interfaces that enable a user to establish an electronic wallet (by, for example, saving payment methods for future use) and facilitate financial transactions between two mobile device users using that electronic wallet.

Indeed, as the Complaint alleges, the claimed invention is directed to (1) "interactions between a mobile device, servers, and payment sources to register and authenticate payment methods for use in future financial transactions within an application on the mobile device" (D.I. 1 ¶ 32 (citation omitted)); (2) "using bilateral communications between the payment sources of credit cards, financial institutions, and/or third-party entities, and the mobile device to store payment methods associated with a particular payment source" (*id.* (citation omitted)); (3) "utilizing function identifiers within the application to initiate a financial transaction with another mobile device using a payment method" (*id.* (citation omitted)); (4) "facilitating bilateral communications between the payment source and the mobile device to execute the financial transaction" (*id.* (citation omitted)); and (5) "transmitting and notifying the other mobile device of the outcome of the financial transaction in real-time" (*id.*).[2] Although the representative asserted claim is verbose, it is still directed to the abstract ideas[3] of establishing an electronic wallet and using that wallet for a financial transaction.

The Supreme Court, Federal Circuit, and this Court have consistently found that "claims directed to the performance of certain financial transactions [are directed to] abstract ideas." *Content Extraction*, 776 F.3d at 1347; *see also Alice*, 573 U.S. at 219 (holding that claims directed to "exchanging financial obligations between two parties using a third-party intermediary to mitigate settlement risk" abstract); *Integrated Tech.*, 2017 WL 631195, at *4 (explaining that claims directed to "fundamental economic and conventional business practices" are "often found

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[2] As noted above, claim 1 of the '296 patent is representative of the asserted independent claims for the '018 and '307 patents.

[3] "[T]he combination of two abstract ideas does not render an abstract idea less abstract." *Broadband iTV, Inc. v. Amazon.com, Inc.*, 113 F.4th 1359, 1368 (Fed. Cir. 2024), *cert. denied*, 145 S. Ct. 1924 (2025).

to be abstract ideas, even if performed on a computer" (citations omitted)). And that is what is claimed by the '296 patent, as admitted by the patent itself.

The '296 patent discloses that, "while the digitization of credit and debit transactions is increasingly expanding by means of computerization and networking, cash remains one of the last hurdles toward full conversion to a true electronic wallet that replaces the actual wallet." '296 patent, 3:35-39. According to the '296 patent, "there still remains an unsatisfied need for a new system, method, and associated service ('system') that enable the consumers to transfer, receive, or otherwise exchange cash amongst themselves and the merchants." *Id.*, 3:50-53. The '296 patent states that the "present invention satisfies this need, and presents a system, method, network, and associated service . . . for executing financial transactions." '296 patent, 3:66-4:4.

The Federal Circuit has found that similar claims, which effectively digitize a financial transaction, are directed to an abstract idea. For example, in *cxLoyalty*, the Federal Circuit found that claims like disputed claim 1 "facilitate[] such a [financial] transaction via transfers of information between the participant, vendor system, and the intermediary (the GUI and API)." 986 F.3d at 1377. As found by the Federal Circuit, "[h]umans have long intermediated these very transactions by collecting and relaying the very same information." *Id*. The Federal Circuit thus held that, "[b]ecause representative claim 1 is directed to transfers of information relating to a longstanding commercial practice, the claim is directed to an abstract idea." *Id*. And the Federal Circuit has made similar conclusions in other cases. *See, e.g.*, *Innovation Scis., LLC v. Amazon.com, Inc.*, 778 F. App'x 859, 863 (Fed. Cir. 2019) (agreeing that the asserted claim "is directed to the abstract idea of securely processing a credit card transaction with a payment server," and noting that "[t]he claim recites, in merely functional, result-oriented terms, receiving credit card payment information at a server different from the server on which the item for purchase is

listed, sending the payment information 'to an established financial channel,' receiving a 'processing decision' from that channel, sending payment confirmation, and updating the server supporting the website listing the item that the item was purchased").

Indeed, the '296 patent describes the effects of the required tasks for the financial transaction process (presenting, receiving, selecting, etc.), but does not "explain[] how to accomplish any of the tasks." *Int'l Bus. Machs. Corp. v. Zillow Grp., Inc.*, 50 F.4th 1371, 1378 (Fed. Cir. 2022) (citation omitted). Such claims that "'merely describe[] an 'effect or result dissociated from any method by which [it] is accomplished' [are] usually 'not directed to patent-eligible subject matter.'" *Id.* (second alteration in original) (quoting *Apple, Inc. v. Ameranth, Inc.*, 842 F.3d 1229, 1244 (Fed. Cir. 2016)). And merely facilitating transactions over the Internet (or between mobile devices) is "not enough for patent eligibility." *AML IP, LLC v. Bath & Body Works Direct, Inc.*, No. 4:22-CV-216-SDJ, 2024 WL 3825242, at *7 (E.D. Tex. Aug. 13, 2024) (quoting *Alice*, 573 U.S. at 223), *appeal filed*, No. 25-1280 (Fed. Cir. Dec. 13, 2024).

In the Complaint, Plaintiff contends that the alleged invention "improves the security of registering and storing financial information on a local application on a mobile device for use in future financial transactions by requiring a security level access to the application on the mobile device." D.I. 1 ¶ 33. But the claim simply recites "providing a login interface requesting security credentials from a first member of the plurality of members before the first member can access the service." '296 patent, 24:20-24. The claim does not recite any other limitations related to "requiring a security level access." And for each of the reasons discussed for the '347 patent above, the claim only "recite[s] 'conventional actions in a generic way'—e.g., authenticating a user using conventional tools and generating and transmitting that authentication—without 'improv[ing] any

underlying technology.'" *Universal Secure Registry*, 10 F.4th at 1352 (alteration in original) (citation omitted).

Plaintiff lists other alleged security features of the claim, including "establishing bilateral communication links between the mobile device and credit card companies, financial institutions, and/or third-party entities." D.I. 1 ¶ 33. But neither the claim nor the specification discloses these "bilateral communication links" in a manner that evidences any "improvement in the functioning of a computer." *Enfish*, 822 F.3d at 1338. A generic assertion that "bilateral communication links"—as opposed to some other type of communication link—improves security is insufficient. *See Innovation Scis.*, 778 F. App'x at 863 (finding "[t]he fact that communication is 'switched' from a website hosted on one server to a website hosted on another server with better security does not mean the invention is directed to 'a specific improvement in the capabilities of computing devices,'" and noting the patent "simply claims the idea of switching to a more secure server for payment processing" (citation omitted)).

Plaintiff also highlights that the claim requires "registering payment methods associated with the credit card company, financial institution, and/or third-party entity; and storing the payment methods on the local application." D.I. 1 ¶ 33. But beyond reciting "one or more interfaces configured to assist the first member to register a set of one or more payment sources for a future transaction," '296 patent, 24:27-30, the claim does not specify where the payment methods are stored or otherwise disclose that this registration entails any "improvement in the functioning of a computer." *Enfish*, 822 F.3d at 1338. That the claim may allegedly have limitations directed to registering and storing payment information does not transform the otherwise-abstract process of establishing an electronic wallet into something more. Indeed, the Federal Circuit has "treated collecting information [(e.g., registering and storing information)],

including when limited to particular content (which does not change its character as information), as within the realm of abstract ideas." *Elec. Power*, 830 F.3d at 1353-54.

Plaintiff's additional allegations are likewise insufficient to alter the analysis. Plaintiff contends that "the '296 [p]atent improves the efficiency of facilitating financial transactions between mobile devices by . . . generating and transmitting a notification of the outcome of the financial transaction in real-time to the initiating mobile device and receiving mobile device." D.I. 1 ¶ 33. But, yet again, this is insufficient because the notification is not a technical improvement and is ancillary to the otherwise abstract idea of using the electronic wallet for a financial transaction. *See Elec. Power*, 830 F.3d at 1354 ("The advance they purport to make is a process of gathering and analyzing information of a specified content, then displaying the results, and not any particular assertedly inventive technology for performing those functions.").

2. *Alice* Step Two: Claim 1 Includes No Inventive Concept and Instead Recites Only Conventional Components Used in Routine Ways

Claim 1 also fails at *Alice* step two. The claim applies the abstract idea on a computer by replacing human intermediaries for conventional financial transactions with various interfaces, but representative claim 1 recites only generic and conventional computer components (i.e., "memory storing program code" and "one or more hardware processors") and functionality for carrying out the abstract ideas. '296 patent, 24:2-25:54. "The claim[] amount[s] to nothing more than applying the above-identified abstract idea using techniques that are, whether considered individually or as an ordered combination, well-understood, routine, and conventional." *cxLoyalty*, 986 F.3d at 1377; *see also Alice*, 573 U.S. at 224-25 ("As stipulated, the claimed method requires the use of a computer to create electronic records, track multiple transactions, and issue simultaneous instructions; in other words, '[t]he computer is itself the intermediary.' In light of the foregoing, the relevant question is whether the claims here do more than simply instruct the practitioner to

implement the abstract idea of intermediated settlement on a generic computer." (alteration in original) (citations omitted)).

For example, the '296 patent discloses that "the term 'interface' includes a hardware, a software, a service, and/or a computer program product that is typically embedded within, or installed on a computer, a server, or otherwise a dedicated auxiliary device. Alternatively, the interface can be saved on a removable storage medium . . . or another ***known or available*** memory device." '296 patent, 9:50-58 (emphasis added). But nothing in the '296 patent suggests that the claimed interfaces are anything more than conventional. "And providing a 'graphical user interface' to implement the abstract idea is similarly not sufficient to make the claim patent eligible." *Angel Techs. Grp., LLC v. Meta Platforms, Inc.*, No. 2022-2100, 2024 WL 4212196, at *5 (Fed. Cir. Sept. 17, 2024) (citing *FairWarning IP, LLC v. Iatric Sys., Inc.*, 839 F.3d 1089, 1096 (Fed. Cir. 2016)). Rather, the purported system "simply append[s] conventional steps, specified at a high level of generality, [which is] not enough to supply an inventive concept." *AML IP*, 2024 WL 3825242, at *7 (quoting *Alice*, 573 U.S. at 222).

In the Complaint, Plaintiff contends that "[t]he claims of the '296 [p]atent describe an inventive concept because they provide a novel and unconventional use of mobile devices with backend systems and specific authentication protocols that store payment methods associated with particular payment sources which use bilateral communications and function identifiers to initiate financial transactions with other mobile devices in real-time in order to protect the financial information of the user." D.I. 1 ¶ 34; *see also id.* ¶¶ 37, 40 (making similar allegations for the '018 and '307 patents). But such allegations do not withstand scrutiny. The Asserted Claims do not recite "backend systems and specific authentication protocols . . . to protect the financial information of the user." *Id.* ¶ 34. Claim 1, like the others, recites "a login interface requesting

security credentials from a first member of the plurality of members before the first member can access the service"—nothing more regarding authentication. '296 patent, 24:20-24. And any inventive concept must be "in the claims," not in unclaimed "technological details set forth in the patent's specification." *Intell. Ventures I*, 838 F.3d at 1322.

3. The Other Claims of the '296, '018, and '307 Patents Are Likewise Ineligible

The other asserted independent claims and all dependent claims are "substantially similar in that they recite little more than the same abstract idea." *Content Extraction*, 776 F.3d at 1348. These claims rely on conventional components or functionality and fail to transform the abstract idea into more. While certain claims "may have a narrower scope than the representative claims, no claim contains an 'inventive concept' that transforms the corresponding claim into a patent-eligible application of the otherwise ineligible abstract idea." *Id.* at 1349, 1351.

For example, the remaining dependent claims of the '296 patent require "the system is a mobile device, and the program code is an application on the mobile device" (claims 2, 9); "the one or more interfaces configured to assist the first member to register the set of one or more payment sources is configured to assist the first member to register a loan account, an international account[,] or a commodity account" (claims 4, 11); "the payee identifier is a telephone number" (claims 6, 13); and "the payee identifier is a contact from an address book" (claim 7, 14). The dependent claims of the '018 and '307 patents recite nearly identical limitations. These other claims do not recite an inventive concept that would otherwise render the claims patent-eligible subject matter.

These "claims are 'substantially similar and linked to the same abstract idea.'" *Content Extraction*, 776 F.3d at 1348 (citation omitted). And these claims do not provide significantly more

than the abstract idea. Accordingly, as each of the claims lacks an inventive concept, no amendment of the Complaint can save Plaintiff's claims from a finding of ineligibility under § 101.

C. The '671 Patent Is Ineligible Under 35 U.S.C. § 101

1. *Alice* Step One: Claim 24 Is Directed to the Abstract Idea of Facilitating a Financial Transaction Between Two Mobile Devices

Claim 24 of the '671 patent is directed to "[a] computer program product that provides a cashless platform for enabling users to perform a financial transaction in a mobile environment." '671 patent, 26:1-34. The claim recites the steps of a financial transaction, including modules to "enter financial information related to the financial transaction," "transfer [financial information (via a code)] to a second user mobile station," "transmit[] the [financial information (via a code)] to a mobile transaction platform to confirm the executability of the financial transaction," "determine[] whether to accept or decline the financial transaction," and "transmit a [notification (via a reverse code)] . . . to confirm whether the financial transaction was either accepted or declined." *Id.* The representative Asserted Claim is thus directed to the abstract idea of facilitating a financial transaction between two mobile devices.

As discussed for the '296 patent, the Supreme Court, Federal Circuit, and district courts have consistently found that "claims directed to the performance of certain financial transactions [are directed to] abstract ideas." *Content Extraction*, 776 F.3d at 1347; *supra* § VI.B.1. This claim is no different. As the Federal Circuit found for similar claims, "[h]umans have long intermediated these very transactions by collecting and relaying the very same information." *cxLoyalty*, 986 F.3d at 1377; *see also Innovation Scis.*, 778 F. App'x at 863. Indeed, the '671 patent recognizes as much, explaining that "[c]ash [(and related transactions)] has developed along with the human evolutions." '671 patent, 2:12-3:40. The '671 patent provides numerous examples of this, from the payment systems of "[t]he Ancient Levantines" to "China during the Tang and Song dynasties."

Id., 2:12-45. Using these historical payment methods, humans were able "to transfer, receive, or otherwise exchange cash amongst themselves and the merchants." *Id.*, 3:27-30. And all of this was done without the aid of a computer.

Plaintiff contends that the '671 patent "improves the security of facilitating financial transactions between mobile devices," including "by requiring a security level access to initiate a financial transaction via an application on an initiating mobile device." D.I. 1 ¶ 30. But claim 24 does not require "a security level access to initiate a financial transaction." And these allegations, even if taken as true, are insufficient to transform the claims into a patent-eligible concept because it is not enough to broadly require "security level access." *See Universal Secure Registry*, 10 F.4th at 1352 ("[T]he claims recite 'conventional actions in a generic way'—e.g., authenticating a user using conventional tools and generating and transmitting that authentication—without 'improv[ing] any underlying technology.'" (alteration in original) (citation omitted)).

Plaintiff contends that the claimed invention improves security through the use of "codes" in the claimed invention to convey information (e.g., allegedly "generating unique codes that identify the financial transaction and the user's sensitive financial information"). D.I. 1 ¶ 30. But "the use of an identification code does nothing more than overlay a second layer of abstraction." *Boom! Payments, Inc. v. Stripe, Inc.*, 839 F. App'x 528, 532 (Fed. Cir. 2021). Neither the claim nor the specification provides any further detail regarding that code, including whether the code is encrypted or how the use of such code improves security in a nonconventional way. Other district courts have found that using unique codes in financial transactions "could easily be performed either by hand or, more simply, with technologies much older than computers." *Asghari-Kamrani v. United Servs. Auto. Ass'n*, No. 2:15cv478, 2016 WL 3670804, at *4 (E.D. Va. July 5, 2016) (providing examples of same), *amended by*, 2016 WL 11642758 (E.D. Va. Aug. 15, 2016). As the

Federal Circuit has previously found, "use of an identification code known only to the buyer and the third party to verify a transaction could be performed just as readily without the use of computers and cannot be said to be a 'technological' solution that improves the functioning of a computer system." *Boom! Payments*, 839 F. App'x at 532. Plaintiff's allegations, even if taken as true, are thus insufficient to transform the claims into a patent-eligible concept.[4]

Claim 24 further recites "transfer[ring] the generated code to a second user mobile station by ***means of a directional movement*** on the first user mobile station in the direction of the second user mobile station." '671 patent, 26:11-15 (emphasis added). Notably, the '671 patent does not allege to have developed the technology to enable a "directional movement" and provides only a minimal description of the limitation in the patent. *See id.*, 4:32-35 ("simply swiping a finger pointed at the other instrument"), 12:53-63 ("the ability to make payment directly with a directional swipe of a finger"), 22:24-28 (filing tax forms "with a directional swipe of a finger"). This directional swipe is insufficient to transform the claims into a patent-eligible concept.

2. *Alice* Step Two: Claim 24 Includes No Inventive Concept and Instead Recites Only Conventional Components Used in Routine Ways

Claim 24 likewise fails at *Alice* step two. The claim applies the abstract idea on a computer, replacing the human role in a cash transaction with generic "module[s]" embedded within first and second "user mobile station[s]." *Id.*, 26:1-34. The claim thus "amount[s] to nothing more than applying the above-identified abstract idea using techniques that are, whether considered

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[4] The Asserted Claim in this instance is unlike those in *Mobile Equity Corp. v. Walmart Inc.*, where this Court found that the challenged e-commerce claims provided a specific improvement in computer technology by addressing "the 'technological problem' that known payment networks were unable to allow mobile devices to initiate mobile transactions using the conventional transaction flow." No. 2:21-cv-00126-JRG-RSP, 2022 WL 4587565, at *6 (E.D. Tex. Sept. 8, 2022), *report and recommendation adopted*, 2022 WL 4587492 (E.D. Tex. Sept. 27, 2022). Here, the claims fail to provide any specific improvement in computer technology.

individually or as an ordered combination, well-understood, routine, and conventional." *cxLoyalty*, 986 F.3d at 1377. Nothing in the Asserted Patent suggests any "improvement in the functioning of a computer." *Enfish*, 822 F.3d at 1338.

In the Complaint, Plaintiff contends that the claims recite "an inventive concept because they . . . unconventionally use[] uniquely generated codes in lieu of sensitive financial information to transfer information relating to the financial transaction between mobile stations; to authenticate the transaction with corresponding financial institutions; and to transmit and execute the outcome of the transaction accordingly." D.I. 1 ¶ 31. But the transmitted codes are, at best, codes generated via known techniques. Indeed, the '671 patent discloses "using various code generation methods or SMS," including "2D or 3D bar/matrix/QR/maxi codes, SMS[,] etc." '671 patent, 4:4-7, 4:66-5:3. The specification fails to detail any innovation with respect to code transmission. This is not sufficient to make the claim patent eligible. *See Boom! Payments*, 839 F. App'x at 533 ("[T]he use of the buyer identifier to confirm consummation of the transaction serves only to authenticate the transaction and is not rooted in a technological problem or solution."); *Universal Secure Registry*, 10 F.4th at 1353 ("[T]he 'encrypted authentication data' is merely a combination of known authentication techniques that yields only expected results.").

3. The Other Claims of the '671 Patent Are Likewise Ineligible

Much like the representative claim discussed above, the other Asserted Claims are "substantially similar in that they recite little more than the same abstract idea." *Content Extraction*, 776 F.3d at 1348. For example, the remaining claims recite additional, nontechnical steps and facets to the user interfaces that further narrow the scope of the claimed financial transaction, including "wherein the second user mobile station executes the financial transaction at a third party financial institution" (claim 2), "wherein the directional movement on the first user mobile station includes a directional swipe movement towards the second user mobile station"

(claim 3), and "wherein any one of the first and second user mobile stations is registered with the mobile transaction platform that authenticates the financial transaction" (claim 22). Each of these additional claims relies on conventional components or functionality and fail to transform the abstract idea into more. While certain claims "have a narrower scope than the representative claims, no claim contains an 'inventive concept' that transforms the corresponding claim into a patent-eligible application of the otherwise ineligible abstract idea." *Id.* at 1349, 1351. These "claims are 'substantially similar and linked to the same abstract idea.'" *Id.* at 1348 (citation omitted). Whether taken alone or in combination, these limitations do not provide significantly more than the abstract idea. Accordingly, as each of the claims lacks an inventive concept, no amendment of the Complaint can save Plaintiff's claims from a finding of ineligibility under § 101.

VII. CONCLUSION

The Asserted Claims of the Asserted Patents are invalid under § 101 as a matter of law. Accordingly, Samsung Defendants respectfully request that the Court dismiss Plaintiff's Complaint with prejudice under Rule 12(c) of the Federal Rules of Civil Procedure.

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Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on August 29, 2025.

/s/ Melissa R. Smith
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