

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

GAEA, LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and  
SAMSUNG ELECTRONICS AMERICA, INC.

Defendants.

Civil Action No. 2:26-cv-00264-JRG-RSP

**DEMAND FOR JURY TRIAL**

**DEFENDANTS' ELIGIBILITY CONTENTIONS**

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## **I. INTRODUCTION**

Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Defendants”) provide these Subject Matter Eligibility (“SME”) Contentions and accompanying document production pursuant to the Court’s Docket Control Order, the Local Patent Rules, and the Court’s Standing Order Regarding Subject-Matter Eligibility Contentions (“SME Contentions Order”). These SME Contentions address Claims 1, 9, and 14 of U.S. Patent No. 10,776,023 (“the ’023 patent”), Claims 1-4 and 9-12 of U.S. Patent No. 11,907,553 (“the ’553 patent”), and Claims 1 and 9 of U.S. Patent No. 12,265,715 (“the ’715 patent”) (collectively, the “Asserted Patents”) (the “Challenged Claims”). Each of the Challenged Claims does not qualify as patent-eligible subject matter, and hence is a “Challenged Claim” under the Court’s SME Contentions Order, as well as invalid under 35 U.S.C. § 101. In the event that Plaintiff asserts additional or different claims, Defendants reserve the right to assert those same additional or different claims are ineligible subject matter and to present related, additional subject matter eligibility contentions.

Defendants incorporate by reference herein their Initial and Additional Disclosures previously served, as well as any supplementations thereto, which include a description of why the Challenged Claims are unpatentable under 35 U.S.C. § 101. Defendants also prospectively incorporate their answer, defenses, and counterclaims to the Complaint, and any amendments and supplementations thereto, which will set forth through notice pleading their § 101 defense, including why the Challenged Claims are directed to and claim an abstract idea and unpatentable subject matter, and hence are invalid.

Defendants also incorporate herein by reference their Invalidity Contentions served herewith pursuant to the Court’s Docket Control Order, and Local Patent Rules 3-3 and 3-4.

Among other things, these Invalidity Contentions, their prior art, and their claim charts disclosing where each claim element is found in the prior art, are evidence of and provide information regarding the following under the Court's SME Contentions Order:

¶ (a)(2)(A): A description of the industry, at the relevant time, in which the Challenged Claims are alleged to be well understood, routine, and conventional, and the factual and legal basis therefor;

¶ (a)(2)(B): A description of how each element of each Challenged Claim, both individually and in combination with the other elements of that claim, was:

(i) well understood;

(ii) routine; and

(iii) conventional,

in the relevant industry at the relevant time, and the legal and factual basis therefor.

Local P.R. 3-3(c) states that the Invalidity Contentions shall include:

(c) A chart identifying where specifically in each alleged item of prior art each element of each asserted claim is found,

Accordingly, these P.R. 3-3(c) claim charts and prior art are charts that provide the information required by ¶¶ (a)(2)(A) and (a)(2)(B) of the Court's SME Contentions Order. Defendants reserve the right to rely upon each and all of their P.R. 3-3(c) claim charts, prior art, and Invalidity Contentions as the factual basis, evidence, and information under both ¶¶ (a)(2)(A) and (a)(2)(B) of the Court's SME Contentions Order.

Plaintiff has not yet provided any subject matter eligibility contentions or otherwise disclosed its complete factual and legal basis in opposition to these SME Contentions and the disclosures required by ¶¶ (a)(2)(A) and (a)(2)(B). Further, to the extent related to subject matter eligibility, including describing the industry at the relevant time and each element of each Challenged Claim as found in the prior art, Plaintiff also has not provided any validity

contentions under 35 U.S.C. §§ 102 or 103. Plaintiff also has not provided any expert report on the issue of subject matter eligibility, the inventors have not yet been deposed, and fact and expert discovery is at an early stage. Defendants therefore reserve the right to further amend or supplement these SME Contentions in response to any further contentions, factual basis, legal basis, fact discovery, or expert discovery by or of Plaintiff asserting that the Challenged Claims are not invalid under § 101, or that the prior art (as disclosed in the Invalidity Contentions and otherwise) does not describe the industry, at the relevant time, or that each element of each Challenged Claim, both individually and in combination with other elements, was (i) well understood; (ii) routine; and (iii) conventional. This may include, but is not limited to, identifying additional prior art and other evidence regarding the state of the industry, providing expert testimony, and providing further factual and legal bases under ¶¶ (a)(2)(A) and (a)(2)(B) for why the Challenged Claims are invalid under 35 U.S.C. § 101.

The Court has not yet construed the Challenged Claims. Defendants reserve the right to amend and supplement these SME Contentions, including based upon the Court's claim construction order, once entered. Defendants' SME Contentions are made in the alternative, and they should not be interpreted or relied upon, or in any way affect, the noninfringement or other invalidity arguments Defendants have asserted. Defendants do not infringe any of the Challenged Claims, which are also invalid under 35 U.S.C. §§ 102, 103, and/or 112(a). Further, these SME Contentions are based upon Plaintiff's infringement theories in its Infringement Contentions. To the extent that Defendants assert prior art versions of their accused products or their accused features and components as a factual basis and evidence under § 101, including of the industry at the relevant time or certain claim elements, Defendants' doing so is not an admission that their accused products infringe any of the Asserted Claims.

Defendants' SME Contentions include citations to representative and exemplary disclosures in the prior art identifying how each element of the Challenged Claims, both individually and in combination with the other elements, were well understood, routine, and conventional in the relevant industry at the relevant time. These citations provide notice regarding Defendants' SME contentions, and are not intended to marshal all evidence regarding subject matter eligibility. Accordingly, Defendants may not cite every disclosure of a claim element in the prior art, and their disclosures regarding how the elements were well understood, routine, and conventional are exemplary only. Defendants reserve the right to rely on additional and similar disclosures within the references and evidence related to the cited disclosures, as well as to provide further explanation. Defendants further reserve the right to rely on additional, similar, or other disclosures that may become applicable in light of changes in Plaintiff's infringement theories and information obtained during discovery.

Where Defendants cite to a particular figure in a prior art reference, the citation should be understood to encompass the caption and description of the figure and vice versa. Where Defendants cite and rely on a patent or patent publication, Defendants necessarily cite, rely on, and incorporate by reference as additional prior art foreign and domestic priority applications, publications, and patents cited in the identified patent or patent publication. The cited patents and patent publications are intended to be representative of related patents and publications (*e.g.*, divisionals, continuations, continuations-in-part, parents, children, and other relationships and claims of priority). The cited patents and patent publications are also intended to be representative of counterparts in other jurisdictions, and other patents and publications that they incorporate (or are incorporated in) by reference. Defendants reserve the right to rely on uncited portions of the prior art references, and on other evidence, including expert testimony, to explain

the disclosures in the prior art references and as evidence of the state of the art, as a description of the industry at the relevant time, and as evidence regarding each element, both individually and in combination, as being well understood, routine, and conventional.

Defendants incorporate in full all prior art references, and other admitted prior art, cited and described in the Asserted Patents, the references incorporated by reference in those references, and the prosecution history of the Asserted Patents.

In certain instances, Defendants have disclosed and charted as certain prior art patents and printed publications. In doing so, Defendants also intend to rely on any and all prior art products, apparatuses, systems, methods, and tangible things that reduce to practice or embody the matters disclosed by the charted prior art patents and printed publications. Defendants' discovery into the prior art is ongoing. Defendants reserve the right to further identify any specific prior art products, apparatuses, systems, methods, and tangible things that practice or embody the prior art to support their SME Contentions.

Defendants reserve the right to present expert evidence and testimony in further support of these SME Contentions and to otherwise demonstrate the Challenged Claims are invalid under 35 U.S.C. § 101. Such testimony may include evidence and information regarding identifying each exception to eligibility, including why the Challenged Claims are directed to an abstract idea, as well as a description of the industry at the relevant time and what was well understood, routine, and conventional in the industry. Defendants specifically reserve the right to present expert testimony on any and all bases and information required by ¶¶ (a)(2)(A) and (a)(2)(B), and to do so in their opening expert report on invalidity in the time and manner required by the Court's Docket Control Order and Discovery Order.

Defendants’ SME Contentions are based on information currently available to Defendants. Defendants’ investigation and analysis is ongoing, and Defendants may amend these SME contentions as they obtain further information and discovery, including both fact and expert discovery.

## II. DISCLOSURES OF INFORMATION UNDER THE SME CONTENTIONS ORDER

**¶ (a)(1) A chart identifying each exception to eligibility (e.g., abstract idea, law of nature, and natural phenomenon) to which each Challenged Claim is directed and the factual and legal basis therefor. The chart shall also identify whether one or more of the Challenged Claims are representative of any other Challenged Claims.**

Under *Alice Corp. Pty. Ltd. v. CLS Bank International*, 573 U.S. 208 (2014), the first step of the patent-eligibility inquiry asks whether the claims at issue are “directed to” an abstract idea. “[D]istrict judges always retain discretion to determine the abstract idea before proceeding to step two ....” *Ollnova Techs. Ltd. v. Ecobee Techs. ULC*, No. 25-1045, at \*21 n.7 (Fed. Cir. 2026) (“[A]nd doing so sometime before trial can avoid the possibility that an after-trial resolution of step one would identify a different abstract idea than reflected in the jury charge, requiring a new trial.”). The Federal Circuit has identified several hallmarks of abstract claims that recur across the analyses below.

First, “the essentially result-focused, functional character of claim language has been a frequent feature of claims held ineligible under § 101.” *Electric Power Group, LLC v. Alstom S.A.*, 830 F.3d 1350, 1356 (Fed. Cir. 2016). Claims that are “so result-focused, so functional, as to effectively cover any solution to an identified problem” are paradigmatically abstract. *Id.* Claims specifying *what* result is to be achieved—rather than claiming a particular inventive technology for performing the functions—are directed to abstract ideas. *Id.* at 1354.

Second, the Federal Circuit has held that combining individually abstract data-management steps does not rescue claims from ineligibility. In *PersonalWeb Technologies LLC*

*v. Google LLC*, 8 F.4th 1310 (Fed. Cir. 2021), the court decomposed a multi-step data-management process and found each step individually abstract, holding that stringing together individually abstract steps “amounts merely to the abstract idea of using a content-based identifier to perform an abstract data-management function.” *Id.* at 1317. The claims as a whole were “directed to a medley of mental processes that, taken together, amount only to a multistep mental process.” *Id.* at 1318. The court further held that controlling 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 we have repeatedly found unpatentable.” *Id.* at 1317 (quoting *Ericsson Inc. v. TCL Commc’n Tech. Holdings Ltd.*, 955 F.3d 1317, 1327 (Fed. Cir. 2020)).

Third, “[t]he concept of data collection, recognition, and storage is undisputedly well-known” and “humans have always performed these functions.” *Content Extraction & Transmission LLC v. Wells Fargo Bank, N.A.*, 776 F.3d 1343, 1347 (Fed. Cir. 2014). The activity of collecting, classifying, and storing information is one that humans have performed through physical organizational systems for centuries—through libraries, filing systems, card catalogs, and other enterprises. *See also Evolutionary Intelligence LLC v. Sprint Nextel Corp.*, 137 F. Supp. 3d 1157, 1165 (N.D. Cal. 2015) (claims merely computerized “age-old forms of information processing such as have previously been employed in libraries, businesses, and other human enterprises with folders, books, time-cards, ledgers, and so on”), *aff’d*, 677 F. App’x 679 (Fed. Cir. 2017); *Encyclopaedia Britannica, Inc. v. Dickstein Shapiro LLP*, 128 F. Supp. 3d 103, 114 (D.D.C. 2015) (“humans have organized and searched for information for hundreds if not thousands of years,” and a computer performing the task faster is “not sufficient to render the idea patentable”).

Finally, a critical distinction separates eligible from ineligible storage-related claims. In *Enfish, LLC v. Microsoft Corp.*, 822 F.3d 1327 (Fed. Cir. 2016), the Federal Circuit held eligible claims directed to “a specific improvement to the way computers operate, embodied in the self-referential table.” *Id.* at 1336. But where claims do not recite any specific improvement to computer functionality and instead merely use “conventional or generic technology in a nascent but well-known environment,” they are directed to an abstract idea. *In re TLI Commc’ns LLC Patent Litig.*, 823 F.3d 607, 611-13 (Fed. Cir. 2016). The claims analyzed below fall on the *TLI* side of that line: they claim information-management objectives using generic components, not specific technological improvements to how storage devices function.

Table 1, below, identifies each exception to eligibility to which each of the Challenged Claims is directed and the legal and factual basis therefor. The Challenged Claims fall into two groups, which are discussed in detail in the below table:

- The ’023 patent claims 1, 9, and 14 are directed to the abstract idea of receiving a policy from a host, storing content utilizing a policy-indicated method, recording storage information for the content, and using that storage information to retrieve the content.
- The ’553 patent, claims 1-4, and 9-12, and ’715 patent claims 1 and 9 are directed to the abstract idea of processing content for storage according to a policy.

**Table 1: Exception to Eligibility for Each Challenged Claim**

| Challenged Claim            | Representative                                                          | Exception to Eligibility                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-----------------------------|-------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ’023 Patent Claims 1, 9, 14 | None of these claims are representative of any other Challenged Claims. | <p><b>Abstract idea.</b> Each of claims 1, 9, and 14 of the ’023 patent, considered as a whole, is directed to the abstract idea of receiving a policy from a host, storing content utilizing a policy-indicated method, recording storage information for the content, and using that storage information to retrieve the content.</p> <p>The claimed abstract idea reflects fundamental, longstanding practices of information management, precisely the kinds of “routine, conventional” organization, storage, and retrieval</p> |

| Challenged Claim | Representative | Exception to Eligibility                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|                  |                | <p>that humans have performed for centuries. <i>See Encyclopaedia Britannica, Inc. v. Dickstein Shapiro LLP</i>, 128 F. Supp. 3d 103, 111-12 (D.D.C. 2015) (claims directed to “collecting, recognizing, and storing data to be easily found and retrieved” are abstract because humans have collected, organized, and stored information “for thousands of years”); <i>Cogent Med., Inc. v. Elsevier Inc.</i>, 70 F. Supp. 3d 1058, 1063-64 (N.D. Cal. 2014) (claims directed to “maintaining and searching a library of information” are “little different than the basic concept of organizing a physical library so that an individual can search for information by going to the relevant portion of the library and picking a book”).</p> <p>The claimed abstract idea maps directly onto the commonplace example of a records clerk working under a head librarian in a conventional, physical library. First, the records clerk <i>receives filing instructions from the head librarian, e.g.</i>, instructions to organize documents alphabetically by author. This mirrors the claims’ step of receiving a storage device policy from a host, where the policy “indicates at least a recording method” for writing content to storage. The head librarian’s filing instruction, like the host-supplied “policy,” reflects the kind of direction that any library administrator might give a clerk; it is not a technological advance but an everyday act of specifying how materials should be organized. <i>See PersonalWeb Techs. LLC v. Google LLC</i>, 8 F.4th 1310, 1316 (Fed. Cir. 2021) (finding that content-based identifiers used to organize, control access to, and retrieve library materials reflect activities long predating computers); <i>Interval Licensing LLC v. AOL, Inc.</i>, 896 F.3d 1335, 1344-45 (Fed. Cir. 2018) (holding as abstract claims directed to “providing information to a person without interfering with the person’s primary activity” because they amounted to nothing more than applying to computers “the nontechnical human activity of passing a note to a person who is in the middle of a meeting or conversation”). Judge Gilstrap recently granted summary judgment that claims directed to the sharing of location information between wireless devices based on access rights were patent-ineligible abstract ideas, adopting Magistrate Judge Payne’s R&amp;R, which cited <i>Interval Licensing</i> in finding such claims analogous to “a method of organizing human activity that the Federal Circuit has found abstract.” <i>Mullen Indus. LLC v. Samsung Elecs. Co., Ltd.</i>, No.</p> |

| Challenged Claim | Representative | Exception to Eligibility                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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|                  |                | <p>2:24-CV-00049-JRG-RSP (E.D. Tex. Aug. 28, 2026) (Dkt. No. 300) at 1-2; R&amp;R at 30-31 (Dkt. No. 292).</p> <p>Second, the records clerk <i>stores the documents on the shelves in the manner dictated by the head librarian's filing instructions</i> (here, in alphabetical order by author). This corresponds to the claims' step of storing content on the storage media "by utilizing the recording method indicated by the at least one storage device policy." The act of storing materials according to a policy-indicated method (<i>e.g.</i>, alphabetically, by subject, by date) is a basic organizational technique that humans have employed in libraries and filing systems for centuries. <i>See Encyclopaedia Britannica</i>, 128 F. Supp. 3d at 112 (noting that "encyclopedias typically are organized in alphabetical order and are searchable using indexes" and that "[t]hese activities long predate the advent of computers" as "[s]uch fundamental human activities are 'abstract ideas' beyond the scope of § 101").</p> <p>Third, the records clerk <i>writes a catalog card bearing a reference number</i> that identifies the stored documents. This is the claims' step of recording "storage information" comprising "at least a content identifier" on a memory of the device controller. In any physical library or filing system, a clerk maintains a catalog (<i>e.g.</i>, an index of identifiers) so that stored items can be located later. Courts have repeatedly recognized that creating an index and using it to search for and retrieve data is an abstract idea. <i>See Daedalus Blue LLC v. Dropbox, Inc.</i>, No. 23-832, 2025 WL 2174718, at *10-11 (D. Del. July 31, 2025) (comparing claims to "a library card catalog system" and holding them directed to the abstract idea of "organizing documents using their content and characteristics"); <i>PersonalWeb</i>, 8 F.4th at 1316 ("Librarians often locate books based on a 'call system' where they assign books unique identifiers based on call numbers.").</p> <p>Fourth, when the head librarian later <i>hands the records clerk a request bearing the reference number</i>, the records clerk <i>uses the catalog card to locate and retrieve the documents and returns them to the head librarian</i>. This corresponds to the claims' steps of receiving a content request comprising the content identifier, retrieving the storage information from the device controller's memory, recovering the content from the storage media "at least in part according to the storage</p> |

| Challenged Claim | Representative | Exception to Eligibility                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|                  |                | <p>information,” and returning the content to the host. For claim 9, the records clerk may further rely on knowledge of how the materials were stored (<i>i.e.</i>, that they are arranged alphabetically) as an additional aid in retrieval, which corresponds to recovering content “according to the at least one storage device policy.” But consulting both a catalog entry and one’s knowledge of the filing system when pulling a document is precisely what any records clerk does; it is not a technological innovation.</p> <p>At every step, the claims describe the functional objective (<i>i.e.</i>, receiving instructions, filing content per those instructions, cataloging it, and later retrieving it) without requiring any particular implementation. <i>See Electric Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350, 1353-54 (Fed. Cir. 2016) (claims focused on “collecting information, analyzing it, and displaying certain results” are directed to an abstract idea where they do not require any “assertedly inventive” technique). The claims thus preempt the basic, longstanding concept of managed storage and retrieval.</p> <p>The Federal Circuit’s decision in <i>Intellectual Ventures I LLC v. Erie Indemnity Co.</i>, 850 F.3d 1315 (Fed. Cir. 2017), is on all fours. There, the court held that claims to “creating an index and using that index to search for and retrieve data” were directed to an abstract idea. <i>Id.</i> at 1327. The court drew an explicit library-classification analogy, describing the claims as employing a concept similar to “a hardcopy-based classification system (such as library-indexing system)” in which “classifiers organize and cross-reference information and resources (such as books, magazines, or the like) by certain identifiable tags, e.g., title, author, subject.” <i>Id.</i> The storage information with content identifier recorded in the ’023 patent’s device-controller memory functions identically to the index entry in <i>Erie</i>: both serve as a guide to locate stored information. And the court noted that claims “so result-focused, so functional, as to effectively cover any solution to an identified problem” are frequently held ineligible under § 101. <i>Id.</i> at 1331-32 (quoting <i>Electric Power Grp.</i>, 830 F.3d at 1356). The ’023 claims fall squarely within that characterization because they recite the result of storing, indexing, and retrieving content without specifying any particular mechanism for accomplishing it.</p> |

| Challenged Claim | Representative | Exception to Eligibility                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|                  |                | <p><i>PersonalWeb</i>, 8 F.4th at 1316-17, reinforces this conclusion. The Federal Circuit held that each data-management function the claims performed (using content-based identifiers, comparing identifiers, controlling access, retrieving data, and marking data for deletion) was independently abstract. The court further held that controlling 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,’” <i>id.</i> at 1317 (quoting <i>Ericsson Inc. v. TCL Commc’n Tech. Holdings Ltd.</i>, 955 F.3d 1317, 1327 (Fed. Cir. 2020)), and observed that “the idea ... is pervasive in human activity, for example, in libraries,” <i>id.</i> (quoting <i>Ericsson</i>, 955 F.3d at 1327).</p> <p><i>PersonalWeb</i>’s holding that each individual data-management function is abstract, and that combining such functions does not yield eligibility, applies directly to the ’023 claims’ sequence of receiving a policy from a host, storing content utilizing a policy-indicated method, recording storage information for the content, and using that storage information to retrieve the content. <i>See also Intellectual Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307, 1313-14 (Fed. Cir. 2016) (holding that “receiving e-mail (and other data file) identifiers, characterizing e-mail based on the identifiers, and communicating the characterization—in other words, filtering files/e-mail—is an abstract idea” and that the patent “merely applies a well-known idea using generic computers”); <i>id.</i> at 1317-18 (analogizing claims to a corporate mailroom that receives correspondence, applies business rules based on attributes of the correspondence, and takes actions accordingly, and holding that such rule-based processing of content is a “fundamental ... practice[] long prevalent”).</p> <p><i>TLI</i> is also instructive. The court characterized the claims as directed to “classifying and storing digital images in an organized manner.” 823 F.3d at 609. Similar to the ’023 claims, the <i>TLI</i> claims described standard hardware (<i>i.e.</i>, a telephone unit and a server) configured to receive, classify, and store digital content without specifying any particular technology for doing so. The court held that “the claims here are not directed to a specific improvement to computer functionality” but rather “to the use of conventional or generic technology in a nascent but well-known environment,” and faulted the specification for “predominately describ[ing] the system and methods in purely functional terms.” <i>Id.</i> at 612. The same is true here: Claims 1, 9, and 14 recite “storage</p> |

| Challenged Claim | Representative | Exception to Eligibility                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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|                  |                | <p>media,” a “device controller,” and a “memory” without describing any novel storage technology, format, or architecture. The ’023 patent claims no specific storage-technology improvement; it claims the information-management concept of policy-based storage and identifier-based retrieval.</p> <p>District-court decisions in closely analogous settings confirm the analysis. In <i>Daedalus Blue</i>, the court held claims directed to rule-based filtering and document indexing abstract, observing that the limitations were “in the form of bare functional language – e.g., creating a validation engine comprised of a validation rule, loading said validation rule, applying said validation rule, etc.” and that “[t]hese limitations amount to a patent on the result of filtering information, rather than a specific manner of achieving the result – a telltale sign that the claims are directed to an abstract idea.” <i>Daedalus Blue</i>, 2025 WL 2174718, at *6. In analyzing a separate patent, the court agreed that claims for organizing documents using identifiers, analogized to “a library card catalog system, where a reader can search for specific copies of a book based on certain characteristics,” were directed to the abstract idea of “organizing documents using their content and characteristics.” <i>Id.</i> at *10-11.</p> <p>Similarly, in <i>Encyclopaedia Britannica</i>, the court cited <i>Cogent Medicine</i> for the proposition that “maintaining and searching a library of information” is “little different than the basic concept of organizing a physical library so that an individual can search for information by going to the relevant portion of the library and picking a book.” 128 F. Supp. 3d at 113. The receive-store-record-retrieve cycle of the ’023 claims is precisely the pattern these courts found to be centuries old.</p> <p>Further, the requirement that the policy “indicates at least a recording method for writing content to the storage media” does not require any particular recording method; it merely requires that the policy “indicate” one. This is not the kind of “specific, limited mathematical rule” that saved the claims in <i>McRO, Inc. v. Bandai Namco Games America Inc.</i>, 837 F.3d 1299, 1313 (Fed. Cir. 2016). Rather, the policy limitation functions like the generic rules in <i>FairWarning IP, LLC v. Iatric Systems, Inc.</i>, 839 F.3d 1089, 1094-95 (Fed. Cir. 2016),</p> |

| Challenged Claim | Representative | Exception to Eligibility                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|                  |                | <p>which asked whether data accesses were “by a specific user,” “during a pre-determined time interval,” or “in excess of a specific volume,” <i>i.e.</i>, vague, high-level criteria that did not specify <i>how</i> the system detects misuse but merely what to look for. <i>Id.</i> at 1095. The Federal Circuit held that, unlike the particular mathematical rules in <i>McRO</i> that “transformed a traditionally subjective process ... into a mathematically automated process,” <i>id.</i> at 1094 (discussing <i>McRO</i>, 837 F.3d at 1313-16), the <i>FairWarning</i> rules lacked the specificity needed to direct the claims to a patent-eligible application. <i>Id.</i> at 1094-95. Here, the ’023 patent’s “policy indicates at least a recording method” limitation does not recite any particular algorithm or technique for writing data. It is the abstract idea of policy-directed storage dressed up in claim language.</p> <p>The claims here do not improve storage technology itself. They do not recite a new file-system format, a novel encoding technique, an improved error-correction method, or any other concrete advance in how a storage device operates. They recite <i>what</i> a storage device should accomplish: receive a policy from a host, store content according to a policy-indicated recording method, keep track of where it put the content, and later use that record to get the content back, without specifying <i>how</i> the device accomplishes any of those objectives. <i>See TLI</i>, 823 F.3d at 612 (claims “directed to the use of conventional or generic technology in a nascent but well-known environment” rather than “a specific improvement to computer functionality”); <i>Electric Power Grp.</i>, 830 F.3d at 1356 (claims that are “so result-focused, so functional, as to effectively cover any solution to an identified problem” are ineligible), <i>cited with approval in Erie</i>, 850 F.3d at 1331-32; <i>Daedalus Blue</i>, 2025 WL 2174718, at *11 (“a technological solution to a technological problem must be captured in the language of the claims to survive at step one”).</p> <p>The ’023 claims preempt the information-management concept of policy-directed storage and information-based retrieval itself, because any storage device that receives a policy from a host, stores content utilizing a policy-indicated method, records storage information for the content, and uses that storage information to retrieve the content would infringe, regardless of the underlying technology employed. That the ’023 claims are styled as apparatus claims reciting physical components—“storage media,” a “device controller,” and a</p> |

| Challenged Claim             | Representative                                                          | Exception to Eligibility                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|                              |                                                                         | <p>“memory”—does not alter this conclusion. “[W]hether a device is ‘a tangible system (in § 101 terms, a ‘machine’)’ is not dispositive,” and “not every claim that recites concrete, tangible components escapes the reach of the abstract-idea inquiry.” <i>Yu v. Apple Inc.</i>, 1 F.4th 1040, 1044 n.2 (Fed. Cir. 2021) (quoting <i>Alice</i>, 573 U.S. at 224). Claim 14’s additional limitation, that “the storage media comprises a solid-state memory device,” merely identifies the technological environment in which the abstract idea is performed; it does not alter the abstract idea itself. <i>See Alice</i>, 573 U.S. at 222 (limiting the use of an abstract idea to a particular technological environment does not render the idea patent-eligible).</p> <p>The additional limitations of claims 1, 9, and 14 of the ’023 patent do not, either individually or as an ordered combination, supply an inventive concept sufficient to confer patent-eligibility at step two of the <i>Alice</i> inquiry. <i>See</i> ¶ (a)(2), <i>infra</i> (discussing the additional limitations). Defendants also incorporate herein by reference each of the prior art references disclosed in Defendants’ Invalidity Contentions, served herewith.</p> |
| ’553 Patent Claims 1-4, 9-12 | None of these claims are representative of any other Challenged Claims. | <p><b>Abstract idea.</b> Claims 1-4 and 9-12 of the ’553 patent are directed to the abstract idea of processing content for storage according to a policy. Whereas the ’023 claims at least require the policy to be received from a host, the ’553 claims require only that the policy be retrieved from device memory (claim 1) or received alongside a storage request (claim 9), without any stated source. And whereas the ’023 patent’s policy must “indicate[] at least a recording method,” the ’553 patent’s policy must only be used to “process the content for storage,” without specifying a particular type of processing or how it is accomplished.</p> <p>The claimed idea maps directly onto the conventional example of a records clerk processing new materials for intake at a physical library. A records clerk receives a new journal for shelving (the “storage request comprising content”). The clerk looks up the library’s standard intake instructions, <i>e.g.</i>, a policy requiring each new item to be date-stamped upon receipt (the “storage device policy” retrieved from “device memory”). The clerk then date-stamps the journal in accordance with those instructions (the</p>                                         |

| Challenged Claim | Representative | Exception to Eligibility                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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|                  |                | <p>programmable processor “process[es] the content for storage based on the storage device policy”). Finally, the clerk hands the processed journal to the shelving librarian, who places it on the shelf (the programmable processor “transfer[s] the content to the device controller,” and the device controller “receive[s] the content ... and store[s] the content on the solid-state memory”). This is a routine intake procedure—receiving materials, applying a standard processing rule, and then shelving them—that libraries and filing systems have performed for as long as they have existed. <i>See Encyclopaedia Britannica</i>, 128 F. Supp. 3d at 111-12; <i>Cogent Med.</i>, 70 F. Supp. 3d at 1063-64.</p> <p>The difference between independent claims 1 and 9 does not alter this conclusion. In claim 1, the programmable processor retrieves the policy from device memory upon receiving a storage request. In claim 9, the storage request itself “compris[es] content and a storage device policy,” and the processing is triggered “in response to receiving the storage request and the storage device policy.” Claim 9 thus specifies only when and with what the policy arrives (bundled with the content in the storage request) rather than specifying any different or more concrete processing mechanism. Whether the records clerk pulls the intake instructions from a drawer (claim 1) or receives them stapled to the incoming materials (claim 9), the abstract idea remains the same: process content for storage according to a policy.</p> <p>The Federal Circuit has repeatedly held ineligible claims that recite functions in purely functional terms without specifying a particular technological mechanism. In <i>TLI</i>, 823 F.3d at 609, the court held abstract claims directed to “classifying and storing digital images in an organized manner,” where conventional hardware was configured to receive content and “administer” it in storage without specifying any particular technology for doing so. The court faulted the specification for “predominately describ[ing] the system and methods in purely functional terms” and failing to provide “any technical details for the tangible components.” <i>Id.</i> at 612. The same is true here: the ’553 patent does not describe a new form of processing, a new storage technique, or a new technological mechanism for implementing the “policy.” It merely describes a functional result, <i>i.e.</i>, content processed according to a policy, then stored.</p> |

| Challenged Claim | Representative | Exception to Eligibility                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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|                  |                | <p>Likewise, in <i>Daedalus Blue</i>, the court held that claims reciting “creating a validation engine comprised of a validation rule, loading said validation rule, applying said validation rule” were directed to the abstract idea of “filtering information based on rules.” 2025 WL 2174718, at *5-6. The court characterized the claim limitations as “bare functional language ... amount[ing] to a patent on the result of filtering information, rather than a specific manner of achieving the result – a telltale sign that the claims are directed to an abstract idea.” <i>Id.</i> That characterization maps directly onto the ’553 claims: “process the content for storage based on the storage device policy” is bare functional language amounting to a patent on the result of processing content according to a rule rather than a specific manner of achieving that result. In both <i>Daedalus Blue</i> and here, no particular “rule” or “policy” or mechanism for applying it is set forth; the claims capture only the functional outcome. <i>See also FairWarning</i>, 839 F.3d at 1094-95 (claims reciting generic rules that specified what to look for but not how to accomplish detection lacked the specificity of <i>McRO</i>’s particular mathematical rules and were directed to an abstract idea).</p> <p>That the ’553 claims are apparatus claims reciting physical components does not save them. As with the ’023 claims, “[w]hether a device is ‘a tangible system (in § 101 terms, a ‘machine’)’ is not dispositive,” and “not every claim that recites concrete, tangible components escapes the reach of the abstract-idea inquiry.” <i>Yu</i>, 1 F.4th at 1044 n.2. The recited solid-state memory, device memory, programmable processor, and device controller are generic storage and computing components performing only their ordinary functions; they provide “a generic environment in which to carry out the abstract idea.” <i>TLI</i>, 823 F.3d at 611.</p> <p>The dependent claims fare no better. Claims 2 and 10 add “an interface connector that communicatively couples” the components to a host computer, <i>i.e.</i>, a generic physical connection that does not change what the apparatus does but merely allows it to connect to another device. Claims 3 and 11 add a printed circuit board for mounting the components, and claims 4 and 12 add a case for supporting the printed circuit board. None of these components specifies any particular technology for processing content, and none alters the abstract</p> |

| Challenged Claim        | Representative                                                          | Exception to Eligibility                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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|                         |                                                                         | <p>idea of policy-based content processing. <i>See Alice</i>, 573 U.S. at 226 (generic computer implementation does not supply an inventive concept); <i>TLI</i>, 823 F.3d at 615 (“the recited physical components behave exactly as expected according to their ordinary use”).</p> <p>Claims 1-4 and 9-12 of the ’553 patent recite an information-management function without reciting a particular technological mechanism for carrying it out. The claims do not set forth any particular type of processing. They do not specify any particular algorithm, compression scheme, encryption technique, or data-transformation method. They describe only the what (<i>i.e.</i>, process content per a policy and store it) but not the how. Accordingly, these claims are directed to an abstract idea.</p> <p>The additional limitations of claims 1-4 and 9-12 of the ’553 patent do not, either individually or as an ordered combination, supply an inventive concept sufficient to confer patent-eligibility at step two of the <i>Alice</i> inquiry. <i>See</i> ¶ (a)(2), <i>infra</i> (discussing the additional limitations). Defendants also incorporate herein by reference each of the prior art references disclosed in Defendants’ Invalidity Contentions, served herewith.</p> |
| ’715 Patent Claims 1, 9 | None of these claims are representative of any other Challenged Claims. | <p><b>Abstract idea.</b> Claims 1 and 9 of the ’715 patent are directed to the same abstract idea as the ’553 patent: processing content for storage according to a policy. But the ’715 claims are even more abstract than the ’553 claims: Unlike ’553 claim 1, which requires the policy to be retrieved from device memory in response to a storage request, ’715 claim 1 does not recite where the policy comes from or what triggers the processing; it simply directs the programmable processor to “process content for storage based on a storage policy” and transfer the content to the device controller for storage. The ’715 claims thus strip away even the modest contextual constraints present in the ’553 patent and claim the bare functional concept of policy-based content processing.</p> <p>The case law and analysis set forth above in connection with the ’023 and ’553 patents applies with equal or greater force here. The ’715 claims recite the same generic components (solid-state memory, device memory, a programmable processor, and a device controller) performing the same</p>                                                                                                                                                                           |

| Challenged Claim | Representative | Exception to Eligibility                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|                  |                | <p>abstract sequence: process content per a policy and store it. None of the claims specifies a particular type of processing or a technological mechanism for accomplishing that processing. As with the '553 claims, this is bare functional language “amount[ing] to a patent on the result” of processing content according to a rule “rather than a specific manner of achieving the result.” <i>Daedalus Blue</i>, 2025 WL 2174718, at *6; <i>see also TLI</i>, 823 F.3d at 611-12; <i>FairWarning</i>, 839 F.3d at 1094-95.</p> <p>That the '715 claims are directed to a “solid-state drive” rather than a generic “apparatus” does not alter the analysis. This merely identifies the technological environment in which the abstract idea is performed. <i>See Alice</i>, 573 U.S. at 222; <i>Yu</i>, 1 F.4th at 1044 n.2.</p> <p>Dependent claim 9 adds a “communication interface” to couple the drive to a host device, a “data link” to couple the programmable processor and device controller, a printed circuit board, and a case. Like the dependent-claim limitations addressed for the '553 patent, these are generic, well-understood hardware features that perform only their ordinary functions and do not alter the abstract idea of policy-based content processing. <i>See TLI</i>, 823 F.3d at 615 (“the recited physical components behave exactly as expected according to their ordinary use”); <i>Alice</i>, 573 U.S. at 226.</p> <p>The additional limitations of claims 1 and 9 of the '715 patent do not, either individually or as an ordered combination, supply an inventive concept sufficient to confer patent-eligibility at step two of the <i>Alice</i> inquiry. <i>See</i> ¶ (a)(2), <i>infra</i> (discussing the additional limitations). Defendants also incorporate herein by reference each of the prior art references disclosed in Defendants’ Invalidity Contentions, served herewith.</p> |

**¶ (a)(2) A chart identifying the following:**

**(A) A description of the industry, at the relevant time, in which the Challenged Claims are alleged to be well understood, routine, and conventional, and the factual and legal basis therefor;**

**(B) A description of how each element of each Challenged Claim, both individually and in combination with the other elements of that claim, was: (i) well understood; (ii) routine; and (iii) conventional, in the relevant industry at the relevant time, and the legal and factual basis therefor.**

Defendants provide as Exhibits A-1, A-2, and A-3 to these SME Contentions a chart identifying the information required under ¶ (a)(2) of the Court’s SME Contentions Order.

**A. The Relevant Industry**

The relevant industry for each of the Challenged Claims is the data-storage-device industry, encompassing the design, manufacture, and firmware development of storage devices (including hard disk drives (HDDs) and solid-state drives (SSDs)). *See, e.g.*, ’023 patent, 1:22-25 (“Technical Field - Aspects of the disclosure are related to data storage devices and in particular to data storage devices with configurable policy-based read and write behavior.”); ’553 patent, 1:23-25 (same); ’715 patent, 1:25-27. The relevant time is November 7, 2016, the asserted priority date for all asserted claims of the ’023, ’553, and ’715 patents.

**B. How Each Element of the Challenged Claims Was Well Understood, Routine, and Conventional**

“If the claims are directed to a patent-ineligible concept, the second step of the *Alice* test requires a court to “examine the elements of the claim to determine whether it contains an ‘inventive concept’ sufficient to ‘transform’ the claimed abstract idea into a patent-eligible application.” *Universal Secure Registry LLC v. Apple Inc.*, 10 F.4th 1342, 1346 (Fed. Cir. 2021) (quoting *Alice*, 573 U.S. at 221). “This inventive concept must do more than simply recite ‘well-understood, routine, conventional activity.’” *Id.* (citing *Mayo*, 566 U.S. at 72, 78-79). Rather, it

must be “sufficient to ensure that the patent in practice amounts to *significantly* more than a patent upon the [abstract idea] itself.” *Alice*, 573 U.S. at 217-18 (emphasis added). “Simply appending conventional steps ... [is] not enough to supply an inventive concept.” *Id.* at 222 (internal quotations omitted); *see also Mayo*, 566 U.S. at 82. For example, “mere recitation of a generic computer cannot transform a patent-ineligible abstract idea into a patent-eligible invention,” because a “wholly generic computer implementation is not generally the sort of ‘additional featur[e]’ that provides any ‘practical assurance that the process is more than a drafting effort designed to monopolize the [abstract idea] itself.’” *Alice*, 573 U.S. at 233 (quoting *Mayo*, 566 U.S. at 77). It is also not enough to “limit[] an abstract idea to one field of use,” or add “token postsolution components,” *Bilski v. Kappos*, 561 U.S. 593, 610-12 (2010), or “limit[] the use of an abstract idea ‘to a particular technological environment,’” *Alice*, 573 U.S. at 223 (quoting *Bilski*, 561 U.S. at 610-11). And limitations that “merely mirror[] the abstract idea itself” cannot supply an inventive concept. *ChargePoint, Inc. v. SemaConnect, Inc.*, 920 F.3d 759, 774 (Fed. Cir. 2019); *Ollnova Techs.*, No. 25-1045, at \*14 (Fed. Cir. 2026) (“[T]his Court’s precedent evaluates the alleged inventive concept at step two in light of the abstract idea identified at step one.”).

Defendants provide, as Exhibits A-1, A-2, and A-3 to these SME Contentions, charts describing how each element of the Challenged Claims, both individually and in combination with the other elements of that claim, was well understood, routine, and conventional in the relevant industry, *see* Section II.A., *supra*, at the relevant time, and the legal and factual basis therefor. Defendants also incorporate herein by reference each of the prior art references disclosed in Defendants’ Invalidity Contentions, served herewith.

**¶ (a)(3) A chart identifying any other factual or legal basis for how the Challenged Claims are otherwise ineligible for patent protection.**

Defendants reincorporate the material in Table 1 and Exhibits A-1, A-2, and A-3 herein by reference as identifying the factual and legal basis for how the Challenged Claims are ineligible for patent protection.

For all of the above reasons and those identified in Exhibits A-1, A-2, and A-3 hereto, the Challenged Claims of the Asserted Patents are invalid under 35 U.S.C. § 101.

Dated: August 31, 2026

Respectfully submitted,

/s/ Stuart W. Yothers

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via email on August 31, 2026.

/s/ Stuart W. Yothers  
Stuart W. Yothers