IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ALLIANCE LAUNDRY SYSTEMS LLC,	)	
	)	
Plaintiff,	)	C. A. No.: 24-733-MN
	)	
v.	)	**JURY TRIAL DEMANDED**
	)	
PAYRANGE INC.,	)	
	)	
Defendant.	)	

ALLIANCE LAUNDRY SYSTEMS LLC'S
PARTIAL MOTION TO DISMISS PAYRANGE'S AMENDED COUNTERCLAIMS

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Plaintiff Alliance Laundry Systems, LLC ("Alliance") hereby moves to dismiss Counterclaim Counts I-III of Defendant PayRange Inc.'s Amended Answer and Counterclaims (D.I. 18) because the asserted claims of U.S. Patent Nos. 11,972,423 ("the '423 Patent"), 11,966,920 ("the '920 Patent"), and 11,481,772 ("the '772 Patent") fail to claim eligible subject matter pursuant to 35 U.S.C. § 101. The reasons supporting this motion are more fully set forth in Alliance's Opening Brief in Support of its Partial Motion to Dismiss, the Declaration of Sarah E. Waidelich, and other pleadings filed in support of this motion.

Alliance is not moving to dismiss Counterclaim Count IV at this time, although Alliance maintains that the asserted claims of U.S. Patent No. 10,891,608 also fail to claim eligible subject matter pursuant to Section 101. Alliance reserves all rights to challenge the claims of this patent at an appropriate time.

Alliance is not filing an Answer to Count IV at the time of filing this Motion because the Motion tolls the period for answering the entirety of the Counterclaims. Case law supporting this course of action is referenced in Footnote 4 in Alliance's Opening Brief in Support of its Partial Motion to Dismiss.

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Dated: October 25, 2024

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PAYRANGE INC.,	)	
	)	
Defendant.	)	

[PROPOSED] ORDER

At Wilmington, this _____ day of _____, 2024, having considered Plaintiff Alliance Laundry Systems LLC's ("Alliance") Partial Motion to Dismiss PayRange's Amended Counterclaims and any pleadings and argument in connection therewith;

IT IS HEREBY ORDERED that Alliance's Partial Motion to Dismiss is GRANTED as follows:

(1) Count I of Defendant PayRange Inc.'s ("PayRange") Amended Answer and Counterclaims is dismissed as to U.S. Patent No. 11,966,920 ("the '920 Patent") because claims 1, 4, 9, 10, 12-15, 17, and 19-20 of the '920 Patent are invalid under 35 U.S.C. § 101 for claiming ineligible subject matter.

(2) Count II of PayRange's Answer and Counterclaims is dismissed as to U.S. Patent No. 11,972,423 ("the '423 Patent") because claims 1, 3, 4, 6, 8-15, 17, 19, and 20 of the '423 Patent are invalid under 35 U.S.C. § 101 for claiming ineligible subject matter.

(3) Count III of PayRange's Answer and Counterclaims is dismissed as to U.S. Patent 11,481,772 (the "'772 Patent") because claim 11 of the '772 Patent is invalid under 35 U.S.C. § 101 for claiming ineligible subject matter.

_____
The Honorable Maryellen Noreika
United States District Court Judge