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Exhibit 2004

Germ Dome Industries LLC
PGR2026-00030
Hyundai Motor America Inc. v.
Germ Dome Industries LLC

18
19 UNITED STATES DISTRICT COURT
20 CENTRAL DISTRICT OF CALIFORNIA
21
22

23 GERM DOME INDUSTRIES LLC,
24
25 Plaintiff,
26
27 v.
28 HYUNDAI MOTOR AMERICA,
Defendant.

Case No.: 8:25-cv-02593-FWS-DFM
**DEFENDANT HYUNDAI MOTOR
AMERICA'S MEMORANDUM OF
POINTS AND AUTHORITIES IN
SUPPORT OF MOTION TO
DISMISS UNDER FED. R. CIV. P.
12(b)(6)**

Date: February 12, 2026
Time: 10:00 a.m.
Ctrm: 10D

The Honorable Fred Wallace Slaughter

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Rules

Fed. R. Civ. P. 12(b)(6)	1, 4
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MEMORANDUM OF POINTS AND AUTHORITIES

Defendant Hyundai Motor America (“Hyundai”), by and through its undersigned counsel and pursuant to Fed. R. Civ. P. 12(b)(6), respectfully moves to dismiss the Complaint (Dkt. 1) of Plaintiff Germ Dome Industries LLC (“Plaintiff”) for alleged infringement of U.S. Patent No. 12,296,061 (the “’061 Patent”). Dismissal is warranted because the ’061 Patent is unpatentable under 35 U.S.C. § 101 as a matter of law.

Although the ’061 Patent is styled as claiming an “apparatus,” it offers no technological advancement. Instead, the patent merely invokes a natural phenomenon—the well-known germicidal properties of certain wavelengths of light—and applies it using generic, non-functional physical components. The patent requires only a “germicidal light source” placed within any generic physical enclosure, relying entirely on the natural properties of light to achieve the stated goal of “sanitizing an object.” In practical effect, the patent purports to cover virtually any multi-sided enclosure equipped with a germicidal light source, regardless of form, function, or technological sophistication, as demonstrated by Plaintiff’s infringement allegations asserting the patent against a glove compartment in an automobile in this case, *see* Dkt. 1, Ex. C, but also against any kind of enclosure that could be used to sanitize a mobile phone or a TV remote in Plaintiff’s prior case asserting the ’061 Patent. *See* Request for Judicial Notice, Ex. 1.¹

Neither the claim language nor the specification of the ’061 Patent supplies an inventive concept that transforms this natural phenomenon into patent-eligible subject matter. To the contrary, the specification admits that germicidal light and its disinfecting effects were already known, and it does not claim any discovery,

¹ In ruling on a Rule 12(b)(6) motion, “courts must consider . . . matters of which a court may take judicial notice.” *Tellabs, Inc. v. Makor Issues & Rights, Ltd.*, 551 U.S. 308, 322 (2007). *See Skilstaf, Inc. v. CVS Caremark Corp.*, 669 F.3d 1005, 1016 n.9 (9th Cir. 2012) (“a ‘court may take judicial notice of matters of public record without converting a motion to dismiss into a motion for summary judgment, as long as the facts noticed are not subject to reasonable dispute’”) (citation omitted)).

1 improvement, or novel technique relating to light generation, control, or application.
2 The patent thus seeks to monopolize the basic idea of placing a known germicidal light
3 source inside an enclosure and turning it on—an idea that falls squarely outside the
4 scope of patent-eligible subject matter under § 101. *See, e.g., Am. Axle & Mfg., Inc. v.*
5 *Neapco Holdings LLC*, 967 F.3d 1285, 1293-97 (Fed. Cir. 2020) (upholding the
6 invalidation of a manufacturing patent under § 101 because it “invokes a natural law,
7 and nothing more, to accomplish a desired result”); *Chamberlain Group, Inc. v.*
8 *Techtronic Industries Co.*, 935 F.3d 1341, 1348-49 (Fed. Cir. 2019) (holding that “the
9 mere physical nature of [patentee’s] claim elements (e.g., controller, interface, and
10 wireless data transmitter) is not enough to save the claims”).

11 **I. STATEMENT OF FACTS**

12 **A. Plaintiff’s Complaint.**

13 Plaintiff filed its Complaint on November 18, 2025, alleging that the 2024 model
14 of Hyundai’s Santa Fe vehicle infringes the ’061 Patent based on the inclusion of what
15 Plaintiff characterizes as “a device for sanitizing an object.” Dkt. 1 at 2-3, n.1.
16 Plaintiff’s theory appears to be that the ’061 Patent broadly encompasses any enclosure
17 with multiple walls and a germicidal light source, and that a glove compartment in the
18 Santa Fe equipped with a disinfecting light therefore falls within the scope of the
19 asserted claims. *See id.*, Ex. C.

20 **B. The ’061 Patent.**

21 The ’061 Patent is titled “System and Apparatus for Sanitizing a Door Opening
22 Device or Other Point of Contact” and purports to cover an apparatus for sanitizing
23 commonly touched objects. Specifically, the patent describes a simple housing that
24 surrounds a “point-of-contact” surface, such as a doorknob, ATM interface, or elevator
25 control, and exposes that surface to one or more sources of germicidal light, such as
26 ultraviolet (“UV”) light. *See generally id.*, Ex. A, 1:55–67. Despite the technical
27 language used in the specification, the claims themselves recite nothing more than the
28 long-known practice of disinfecting surfaces with high frequency light, applied to

1 everyday objects. The claims do not disclose or require any new sanitization technique,
2 any improvement to germicidal light technology, or any non-conventional arrangement
3 of components. Instead, they merely apply the abstract idea of sanitizing a surface using
4 a natural phenomenon of certain light and a conventional enclosure.

5 The Complaint purports to assert Claims 1, 6, 10, and 11. *See id.* Ex. C.
6 Independent Claim 1 is representative (“Representative Claim 1”) of the asserted claims
7 (and all claims, for matter) of the ’061 Patent because it captures the purported inventive
8 concept of the ’061 Patent and reflects the same alleged advancement described
9 throughout the specification. *See id.*, Ex. A.

10 Claim 1 provides:

11 “1. An apparatus for sanitizing an object, the apparatus comprising:
12 a housing at least partially defining an interior cavity configured to
13 accept the object, wherein the object includes a sanitizing surface,
the housing including:
14 a first end wall located at a first end of the interior cavity
and having a first end wall interior surface at least
15 partially defining the interior cavity;
16 a sidewall extending from and integral with at least a portion
of the first end wall and having a sidewall interior
17 surface at least partially defining the interior cavity;
and
18 a second end wall on an opposite end of the interior cavity
from the first end wall having a second end wall
19 interior surface at least partially defining the interior
cavity,
20 wherein the second end wall at least partially defines an
opening into the interior cavity; and
21 at least one germicidal light source disposed within the
interior cavity,
22 wherein the germicidal light source provides germicidal
light into the interior cavity.”
23
24
25

26 Dkt. 1, Ex. A at Cl. 1.

27 The remaining asserted claims add only minor or conventional variations that do
28 not recite any new sanitization technique, improvement to germicidal light, or

1 unconventional interaction between components. *See, e.g., id.* at Cls. 6, 10, 11. These
2 include merely specifying particular objects to be sanitized, reciting generic housing
3 features, or including routine design choices regarding reflecting or projecting UV. *Id.*
4 All claims are therefore directed to the same underlying concept—enclosing a point-of-
5 contact surface within a housing and exposing it to germicidal light in order to sanitize
6 the surface. *See generally id.*

7 **II. LEGAL STANDARDS**

8 **A. Patent Eligibility Under 35 U.S.C. § 101 Is Properly Decided On A** 9 **Rule 12(b)(6) Motion.**

10 Under Rule 12(b)(6), a defendant may move to dismiss for failure to state a claim
11 upon which relief can be granted. Fed. R. Civ. P. 12(b)(6). A complaint may be
12 dismissed for failure to state a claim for one of two reasons: (1) lack of a cognizable
13 legal theory; or (2) insufficient facts under a cognizable legal theory. *Bell Atl. Corp. v.*
14 *Twombly*, 550 U.S. 544, 555 (2007); *see also Mendiondo v. Centinela Hosp. Med. Ctr.*,
15 521 F.3d 1097, 1104 (9th Cir. 2008) (“Dismissal under Rule 12(b)(6) is appropriate
16 only where the complaint lacks a cognizable legal theory or sufficient facts to support
17 a cognizable legal theory.”).

18 A court may decide patent eligibility on the pleadings if it is apparent from the
19 face of the patent that the asserted claims are patent-ineligible. *Berkheimer v. HP Inc.*,
20 881 F.3d 1360, 1368 (Fed. Cir. 2018). The Federal Circuit has “repeatedly affirmed
21 § 101 rejections at the motion to dismiss stage, before claim construction or significant
22 discovery.” *Cleveland Clinic Found. v. True Health Diagnostics LLC*, 859 F.3d 1352,
23 1360 (Fed. Cir. 2017); *see also Mobile Acuity Ltd. v. Blippar Ltd.*, 110 F.4th 1280 (Fed.
24 Cir. 2024). This Court has regularly granted Rule 12(b)(6) motions to dismiss on the
25 issue of § 101 eligibility. *See, e.g., Maxell, Ltd. v. VIZIO, Inc.*, No. CV 21-6758-GW-
26 DFMX, 2023 WL 3431898, at *8 (C.D. Cal. Apr. 19, 2023); *Apollo Fin., LLC v. Cisco*
27 *Sys., Inc.*, 190 F. Supp. 3d 939, 947 (C.D. Cal. 2016).

B. Patent Eligible Subject Matter Under 35 U.S.C. § 101

The Supreme Court has articulated a two-step inquiry to determine whether claims are directed to patent-ineligible concepts pursuant to 35 U.S.C. § 101. *Alice Corp. v. CLS Bank International*, 573 U.S. 208, 217–18 (2014). “The prescribed approach requires a court to determine (1) whether the claim is directed to a patent-ineligible concept, i.e., a law of nature, a natural phenomenon, or an abstract idea, and if so, (2) whether the elements of the claim, considered both individually and as an ordered combination, add enough to transform the nature of the claim into a patent-eligible application.” *Affinity Labs of Texas, LLC v. DIRECTV, LLC*, 838 F.3d 1253, 1257 (Fed. Cir. 2016) (internal quotation marks omitted) (citing *Alice*, 573 U.S. at 217–18).

In *Alice* step one, “[l]aws of nature” and “natural phenomenon,” are not patentable even if they are discovered by the patentee. *Mayo Collaborative Servs. v. Prometheus Lab’ys, Inc.*, 566 U.S. 66 (2012). “[A] new mineral discovered in the earth or a new plant found in the wild is not patentable subject matter. Likewise, Einstein could not patent his celebrated law that $E=mc^2$; nor could Newton have patented the law of gravity. Such discoveries are ‘manifestations of . . . nature, free to all men and reserved exclusively to none.’” *Diamond v. Chakrabarty*, 447 U.S. 303, 309 (1980) (quoting *Funk Bros. Seed Co. v. Kalo Inoculant Co.*, 333 U.S. 127, 130 (1948)). A claim “is directed to a natural law [when] it clearly invokes a natural law, and nothing more, to accomplish a desired result.” *Am. Axle & Mfg.*, 967 F.3d at 1297.

At *Alice* step two, it is first recognized that “all inventions at some level embody, use, reflect, rest upon, or apply laws of nature, natural phenomena, or abstract ideas.” *Mayo*, 566 U.S. at 71. It is thus necessary to determine whether the claim at issue includes sufficient “additional features” such that the claim is not monopolizing the abstract idea or natural law. *Alice*, 573 U.S. at 221 (quoting *Mayo*, 566 U.S. at 72). As a matter of law, there is nothing inventive about implementing an abstract idea using “‘well-understood, routine, conventional activit[ies]’ previously known to the

1 industry.” *Alice*, 573 U.S. at 225; *see also FairWarning IP, LLC v. Iatric Sys., Inc.*, 839
2 F.3d 1089, 1093 (Fed. Cir. 2016); *Intellectual Ventures I LLC v. Symantec Corp.*, 838
3 F.3d 1307, 1313 (Fed. Cir. 2016) (“‘[S]imply appending conventional steps, specified
4 at a high level of generality,’ which are ‘well known in the art’ and consist of ‘well-
5 understood, routine, conventional activit[ies]’ previously engaged in by workers in the
6 field, is not sufficient to supply the inventive concept.”).

7 Where, as here, a patent’s claims are substantially similar and linked to the same
8 abstract idea, a single representative claim may be analyzed for purposes of § 101. *See*
9 *Accenture Global Services, GmbH v. Guidewire Software, Inc.*, 728 F.3d 1336, 1344
10 (Fed. Cir. 2013) (“claims with only “minor differences in terminology . . . should rise
11 or fall together”); *see also Content Extraction & Transmission LLC v. Wells Fargo*
12 *Bank, Nat. Ass’n*, 776 F.3d 1343, 1348 (Fed. Cir. 2014) (holding that claims of asserted
13 patents were “substantially similar” in reciting “little more than the same abstract idea”
14 for purposes of a § 101 challenge).

15 **III. ARGUMENT**

16 **A. The ’061 Patent Is Directed To Patent-Ineligible Subject Matter** 17 **Under § 101.**

18 The ’061 Patent is directed to and relies entirely on a well-known, naturally
19 occurring quality of certain wavelengths of light. The ’061 Patent does not claim or
20 otherwise disclose any technological improvement to the process of sanitizing objects
21 or to the use of specific wavelengths of light and therefore does not transform the
22 underlying natural phenomenon into patent-eligible subject matter.

23 1. *Alice* Step One: The ’061 Patent Is Directed To A Natural 24 Phenomenon.

25 Representative Claim 1 merely recites the goal of sanitizing an object by
26 exposing it to germicidal frequencies of light using a generic physical enclosure. *See*
27 Dkt. 1, Ex. A, at Cl. 1. Although framed as an “apparatus,” the claim rests entirely on
28 the naturally occurring fact that exposure to particular wavelengths of light, such as UV

1 light, kills microorganisms. *Id.* The claim requires only that a conventional germicidal
2 light source be placed within a generic housing so that the light reaches the object to be
3 sanitized. *Id.* It does not purport to discover a new method of sanitization, improve the
4 operation of germicidal light, or claim any unconventional physical configuration that
5 alters how light is generated, directed, or applied. Accordingly, the claim is directed to
6 a patent-ineligible natural phenomenon.

7 A claim to the use of a natural phenomenon to accomplish a generalized task has
8 long been recognized as ineligible subject matter. *See O'Reilly v. Morse*, 56 U.S. 62,
9 77, 113 (1853) (finding a claim to communication over distance using electromagnetism
10 generally to be ineligible in part because “it matter[ed] not by what process or
11 machinery the result [wa]s [to be] accomplished”). The Federal Circuit has repeatedly
12 held that claims that simply recite or apply a natural law, without meaningful limitations
13 or non-routine steps, are patent ineligible. *See, e.g., Athena Diagnostics, Inc. v. Mayo*
14 *Collaborative Services, LLC*, 915 F.3d 743, 752 (Fed. Cir. 2019) (holding a discovered
15 correlation between antibody presence and neurological disease existed in nature
16 independent of human action). The same is true here. The '061 Patent expressly admits
17 that it is was already known that that certain wavelengths of light kill germs, particularly
18 UV light identified in Representative Claim 1. *See* Dkt. 1, Ex. A, 3:31–44. The mere
19 exposure of microorganisms on an object to germicidal wavelengths “correlates”
20 directly with their destruction (*id.*), and Representative Claim 1 introduces no
21 intervening steps, technical controls, or unconventional mechanisms between exposure
22 and result. Nor do the claims purport to alter, improve, or engineer the underlying
23 phenomenon. The germicidal wavelengths at issue are naturally occurring, and the '061
24 Patent does not claim otherwise.

25 On its face, the claim does not disclose any technological improvements to the
26 use of germicidal frequencies of light or to the process of sanitization itself. Rather, it
27 broadly claims a generic physical structure—a “housing” defining an “interior
28 cavity”—into which a conventional germicidal light source is placed so that the light

1 reaches an object. The claim thus covers no more than an enclosure with walls and a
2 light inside it. The claim imposes no meaningful structural constraints on the housing,
3 no functional limitations on how the light operates, and no technical requirements
4 governing how sanitization is achieved. It does not recite any manipulation,
5 modulation, amplification, or control of the germicidal light, nor does it describe any
6 nonconventional interaction between the light source and the object being sanitized.
7 Instead, it relies entirely on the known natural germicidal properties of certain
8 wavelengths of light, asserting that by simply “provid[ing] germicidal light into the
9 interior cavity,” the apparatus will sanitize an object. *Id.*

10 This sweeping claim scope explains both the overbreadth of the ’061 Patent and
11 Plaintiff’s litigation theory. Under Plaintiff’s reading, any enclosed space equipped
12 with a germicidal light regardless of size, purpose, or technological sophistication falls
13 within the patent’s reach. Here, Plaintiff contends that a glove compartment in a
14 consumer vehicle, outfitted with a disinfecting light, infringes. In its prior action,
15 Plaintiff alleged that any other enclosure that can be used to hold a mobile phone or
16 other household item, infringes. Dkt. 1, Ex. A. This confirms that the patent does not
17 claim a specific sanitization device, an improved light-based technology, or a novel
18 enclosure design; it claims the idea of putting an object in an enclosed space and shining
19 germicidal light on it. Such generic structural elements—walls, cavities, and light
20 sources—do not transform that idea into a patent-eligible invention.

21 Plaintiff may attempt to recast the ’061 Patent as claiming a specific “application”
22 rather than a natural law, but the Supreme Court has made clear that appending
23 conventional steps, stated at a high level of generality, to laws of nature or natural
24 phenomena does not render them patentable. *Mayo*, 566 U.S. at 82. Such reframing
25 should be rejected where, as here, the claims merely define a desired result and instruct
26 the practitioner to achieve it by applying a natural principle. *See, e.g., Am. Axle*, 967
27 F.3d at 1293–94 (holding a manufacturing method ineligible where “patentee [did] not
28 even claim to have discovered a previously unknown natural law” and instead

1 “define[d] a goal” which was achieved using “a natural law of relating frequency to
2 mass and stiffness—i.e., Hooke’s Law.”). The ’061 Patent does not claim to have
3 discovered the germicidal properties of certain wavelengths of light; instead, it defines
4 the goal of “sanitizing an object” and achieves that goal by applying the natural
5 germicidal properties of certain wavelengths of light.

6 The Federal Circuit has likewise rejected attempts to evade § 101 by
7 characterizing claims as mere “uses” or “applications” of a natural phenomenon. In
8 *Ariosa Diagnostics, Inc. v. Sequenom, Inc.*, the court held claims ineligible where the
9 only purportedly inventive aspect involved a naturally occurring phenomenon—
10 paternally inherited cell-free fetal DNA (“cffDNA”)—and all remaining claim elements
11 were conventional. 788 F.3d 1371, 1376–77 (Fed. Cir. 2015). The court rejected the
12 argument that the claims were patentable because they recited a particular “use” of the
13 natural phenomenon, explaining that the natural phenomenon itself was “the only
14 inventive feature of the claims.” *Id.* The same principle applies here. Although
15 Representative Claim 1 may be framed as “using” germicidal light to achieve a desired
16 result, it is nonetheless directed to the natural phenomenon itself, applied through an
17 entirely conventional housing or enclosure, and is therefore patent-ineligible under
18 § 101.

19 Nor does the fact that the representative claim recites a physical product or
20 system, rather than a process or method, save it from § 101 scrutiny. The Federal Circuit
21 has repeatedly held that merely casting an ineligible concept in the form of a tangible
22 apparatus does not render it patent eligible. For example, in *Yu v. Apple Inc.*, the claim
23 at issue was directed to an “improved digital camera”:

24 “1. An improved digital camera comprising:
25 a first and a second image sensor closely positioned with respect to a
26 common plane, said second image sensor sensitive to a full region
27 of visible color spectrum;
28 two lenses, each being mounted in front of one of said two image sensors;
said first image sensor producing a first image and said second image
sensor producing a second image;

1 an analog-to-digital converting circuitry coupled to said first and said
2 second image sensor and digitizing said first and said second
3 intensity images to produce correspondingly a first digital image and
4 a second digital image;
5 an image memory, coupled to said analog-to-digital converting circuitry,
6 for storing said first digital image and said second digital image; and
7 a digital image processor, coupled to said image memory and receiving
8 said first digital image and said second digital image, producing a
9 resultant digital image from said first digital image enhanced with
10 said second digital image.”

11 1 F.4th 1040, 1042 (Fed. Cir. 2021). The court rejected the patentee’s attempt to
12 characterize the claims as a patent-eligible “application,” emphasizing that the claims
13 failed to recite any technological improvement to the camera components or image-
14 processing technology. *Id.* at 1044. The same reasoning applies here. Like the camera
15 components in *Yu*, the structural elements recited in the ’061 Patent—walls, an interior
16 cavity, and a light source—are generic physical components performing their ordinary
17 functions. Representative Claim 1 does not improve how light is generated, controlled,
18 or applied, but merely recites placing a known germicidal light source inside a generic
19 enclosure and merely to use the natural properties of light to achieve the desired result
20 of sanitization. As in *Yu*, reciting conventional physical components to carry out an
21 ineligible concept does not render the claims patent eligible under § 101.

22 Similarly, in *ChargePoint, Inc. v. SemaConnect, Inc.*, the Federal Circuit
23 invalidated apparatus claims directed to network-controlled electric vehicle charging
24 stations, notwithstanding that the claims recited concrete physical components such as
25 control devices, transceivers, controllers, and electrical couplers. 920 F.3d 759, 766
26 (Fed. Cir. 2019). There, the claims at issue recited:

27 “1. An apparatus, comprising:
28 a control device to turn electric supply on and off to enable and disable
charge transfer for electric vehicles;
a transceiver to communicate requests for charge transfer with a remote
server and receive communications from the remote server via a data
control unit that is connected to the remote server through a wide
area network; and

1 a controller, coupled with the control device and the transceiver, to cause
2 the control device to turn the electric supply on based on
3 communication from the remote server.

4 2. The apparatus of claim 1, further comprising an electrical coupler to make a
5 connection with an electric vehicle, wherein the control device is to turn
6 electric supply on and off by switching the electric coupler on and off.”

7 *Id.* at 766. The court rejected the patentee’s attempt to characterize the claims as a
8 patent-eligible “application,” explaining that limiting an abstract idea to a physical
9 context does not render it patentable absent an improvement to the underlying
10 technology. *Id.* at 768. The same flaw is present here. Like the charging stations in
11 *ChargePoint*, the ’061 Patent recites generic physical components—walls, an interior
12 cavity, and a light source—but does not improve how those components function or
13 how sanitization is performed. Representative Claim 1 merely applies the natural
14 germicidal properties of light in a generic enclosure, which, as in *ChargePoint*, is
15 insufficient to confer patent eligibility under § 101.

16 This Court too has held that claims reciting physical systems or devices are
17 patent-ineligible where they merely apply an abstract idea or natural principle using
18 conventional components. In *BlackBerry Ltd. v. Facebook, Inc.*, the Court invalidated
19 system claims under § 101 despite their recitation of concrete elements such as servers,
20 processors, and mobile devices, explaining that those components merely provided a
21 generic environment for carrying out an ineligible concept and did not reflect any
22 technological improvement to the underlying system. 487 F. Supp. 3d 870, 878, 885
23 (C.D. Cal. 2019). Likewise, although framed as an “apparatus,” Representative Claim
24 1 recites only generic physical elements—walls, an interior cavity, and a light source—
25 performing their ordinary functions and relying entirely on the natural germicidal
26 properties of light, which, as *BlackBerry* confirms, does not transform an ineligible
27 concept into patent-eligible subject matter under § 101.

28 Moreover, the purely functional language of Representative Claim 1 confirms
that it is directed to patent-ineligible subject matter. Specifically, the claim fails to

1 explain how the germicidal light sanitizes the object or how the light source generates
2 the light. Instead, the claim relies on high-level, simple functional language such as
3 “wherein the germicidal light source provides germicidal light,” a statement which is
4 predicated on the fact that certain wavelengths of light do in fact, in nature, have
5 germicidal properties. Courts have repeatedly rejected claims that recite desired
6 outcomes without disclosing a concrete technological solution. *See, e.g., Interval*
7 *Licensing LLC v. AOL, Inc.*, 896 F.3d 1335, 1345 (Fed. Cir. 2018) (“result-oriented”
8 claims paired with a specification that “lacks any description” are directed to abstract
9 ideas); *Affinity Labs of Tex., LLC v. Amazon.com Inc.*, 838 F.3d 1266, 1269 (Fed. Cir.
10 2016) (“The purely functional nature of the claim confirms that it is directed to an
11 abstract idea, not to a concrete embodiment of that idea”). Here, Representative Claim
12 1 recites the goal of sanitizing an object but lacks specificity on how to achieve this
13 beyond relying on the natural, well-known germicidal properties of certain wavelengths
14 of light. All of the limitations of Representative Claim 1 are generic and conventional
15 components or mere statements of desired results. The “germicidal light source” is
16 generic and unspecified, and the remaining housing structure is nothing more than a box
17 with a hole on either end. Neither the housing nor the light source can reasonably be
18 considered non-conventional. Representative Claim 1 cannot be said to be directed to
19 anything other than the core natural phenomenon upon which it relies for the desired
20 result of sanitization.

21 Accordingly, under *Alice* step one, Representative Claim 1 and the remaining
22 asserted claims are directed to the natural phenomenon of germicidal light, and are not
23 patent-eligible.

24 2. *Alice* Step Two: The Asserted Claims Fail To Supply An Inventive
25 Concept, And The Specification Confirms None Exists

26 Under *Alice* step two, claims are only valid if they contain an inventive concept
27 sufficient to transform the abstract idea into a patent-eligible invention. *Alice*, 573 U.S.
28 at 217. To be patent eligible, a claim must include “additional features” beyond the

1 natural phenomenon itself, which “requires more than simply stat[ing] the [idea] while
2 adding the words ‘apply it.’” *Id.* at 221. “To save a patent at step two, [the] inventive
3 concept must be evident in the claims.” *Two-Way Media Ltd. v. Comcast Cable*
4 *Commc’ns, LLC*, 874 F.3d 1329, 1338–39 (Fed. Cir. 2017) (affirming that disclosure of
5 a purported “technological innovation” in a patent’s specification cannot save a patent
6 under *Alice* step two, and that the “inventive concept” must be found in the claim itself).

7 The ’061 Patent itself repeatedly admits that it claims nothing new, expressly
8 acknowledging that both the problem it purports to address—contamination of
9 frequently touched surfaces—and the purported solution—sanitizing those surfaces
10 using germicidal light—were well known and conventional. Rather than disclosing a
11 technological advancement, the patent concedes that it relies on long-understood
12 properties of light and commonplace physical structures, confirming that it merely
13 repackages established knowledge without adding anything inventive.

14 Specifically, the patent acknowledges that it has long been known that “points of
15 contact for large groups of people,” including doorknobs, elevator buttons, and control
16 panels, can spread communicable germs. Dkt. 1, Ex. A at 1:36–39. It further recites
17 that sanitizing objects using UV light was well known, expressly stating that UV light
18 in the range of approximately 100 to 280 nanometers—referred to as germicidal UV—
19 was already “known to be deadly to bacteria and other micro-organisms.” *Id.* at 3:31–
20 40. The specification likewise admits that other forms of germicidal light, such as high-
21 intensity, narrow-spectrum (“HINS”) radiation, were known and could be used. *Id.* at
22 3:55–62.

23 Nor does the ’061 Patent claim any innovation in how light is directed or
24 controlled. It merely observes that light can be reflected by common materials,
25 suggesting that interior surfaces “may be configured in shape and material to reflect or
26 direct” germicidal light using ordinary substances such as aluminum or glass. *Id.* at
27 5:4–6, 5:34–35. These disclosures describe nothing more than routine design choices
28 and fundamental physical properties, not any new or unconventional technique for

1 sanitization or light control. Strikingly, neither Representative Claim 1 nor the
2 specification address any of the parameters that actually govern whether light-based
3 sanitization works at all, such as the relationship between the size of the object, the
4 volume of the enclosure, the output intensity of the light source, or the distance between
5 the light source and the object. These factors are fundamental to any light-based
6 technology, yet the patent is silent as to them. Those omissions underscore the point:
7 the '061 Patent does not claim a technological solution, but merely invokes the known
8 germicidal properties of light and assumes the result will follow.

9 The stated purpose of the apparatus in Representative Claim 1 is simply
10 “sanitizing an object.” Dkt. 1, Ex. A at Cl. 1. That result is achieved in the most
11 minimal and generic way possible: by placing a germicidal light source inside an
12 enclosure. Representative Claim 1 requires nothing more than “at least one germicidal
13 light source disposed within the interior cavity,” such that the light “provides germicidal
14 light into the interior cavity.” *Id.* The remaining asserted claims do not meaningfully
15 alter that concept. Claim 11 merely adds a UV-reflective interior surface to bounce
16 light toward the object; Claim 6 adds a similar reflective limitation; and Claim 10 recites
17 additional generic structural features that have no bearing on how sanitization is
18 performed. *Id.* at Cls. 6, 10, 11. None of these limitations change the nature of the
19 claimed invention or introduce any technological improvement.

20 In short, the asserted claims of the '061 Patent do nothing more than define a
21 desired result—sanitizing an object—and instruct the practitioner to achieve that result
22 by using a known germicidal light in a generic enclosure. Neither Representative Claim
23 1 nor any dependent claim, whether considered alone or in light of the specification,
24 supplies an inventive concept capable of transforming the abstract idea of sanitization
25 or the natural law governing the germicidal properties of light into patent-eligible
26 subject matter under § 101.

27 The Federal Circuit has made clear that the result of a natural phenomenon,
28 standing alone, cannot supply an inventive concept. *Am. Axle*, 967 F.3d at 1299 (“a

1 claimed invention’s use of the ineligible concept to which it is directed cannot supply
2 the inventive concept’ required to cross the line into eligibility”) (quoting *BSG Tech*
3 *LLC v. Buyseasons, Inc.*, 899 F.3d 1281, 1290 (Fed. Cir. 2018). Representative Claim
4 1 does nothing more than recite a simple physical housing in which a germicidal light
5 source is mounted. The claimed sanitizing effect arises solely from the natural
6 germicidal properties of the light itself, not from any claimed technological feature of
7 the housing. The housing merely serves as a conventional structure for holding and
8 directing the light toward an object to be sanitized and provides no functional advantage
9 beyond enabling the light’s ordinary operation. Because Representative Claim 1 recites
10 no technological advance or improvement over the abstract idea of sanitizing objects, it
11 fails to supply an inventive concept and is ineligible under § 101.

12 Nor can an inventive concept arise from merely implementing an abstract idea or
13 natural law using routine and conventional components. The Federal Circuit has
14 repeatedly rejected claims that “simply instruct the practitioner to implement the
15 abstract idea with routine, conventional activity.” *Ultramercial, Inc. v. Hulu, LLC*, 772
16 F.3d 709, 715–16 (Fed. Cir. 2014); *see also BSG Tech.*, 899 F.3d at 1288 (holding that
17 claims are “not directed to an improvement in computer functionality if the [alleged]
18 technical benefits flow solely from performing an abstract idea in conjunction with
19 well-understood structure”). Instead, an inventive concept must stem from a “non-
20 conventional and non-generic arrangement of known, conventional pieces.” *BASCOM*
21 *Global Internet Servs., Inc. v. AT&T Mobility LLC*, 827 F.3d 1341, 1350–52 (Fed. Cir.
22 2016). That is not the case here.

23 Where, as here, the claim limitations not drawn to eligible subject matter “only
24 require standard techniques to be applied in a standard way,” and the specification itself
25 confirms those techniques are conventional, the claims necessarily fail *Alice* step two.
26 *Athena Diagnostics*, 915 F.3d at 753. The ’061 Patent expressly admits that the
27 germicidal properties of certain wavelengths of light were well known, and it nowhere
28 claims that the housing’s shape, materials, or configuration are novel or technologically

1 improved. Merely adding “recited physical components [that] behave exactly as
2 expected according to their ordinary use” does not supply an inventive concept. *In re*
3 *TLI Commc’ns LLC Patent Litig.*, 823 F.3d 607, 615 (Fed. Cir. 2016).

4 Representative Claim 1 also fails *Alice* step two because it is “recited at a high
5 level of generality and merely invokes well-understood, routine, conventional
6 components to apply the abstract idea.” *Yu v. Apple Inc.*, 1 F.4th 1040, 1045 (Fed. Cir.
7 2021) (holding that, although the claimed hardware configuration was “vital” to
8 performing the asserted image enhancement, it served only as a conduit for the abstract
9 idea). This Court has applied the same principle, holding that generic components
10 performing their ordinary functions cannot supply an inventive concept. *See Maxell*,
11 2023 WL 3431898, at *6. And even where a patentee asserts that particular results or
12 components are unconventional, claims lacking specific structure or architecture remain
13 ineligible. *See Dynamic Ticket Sys., LLC v. Ticketmaster LLC*, No. 2:24-cv-00269-
14 JVS-PD, Dkt. 73 (C.D. Cal. Mar. 25, 2024).

15 That is precisely the situation here. Representative Claim 1 invokes only generic
16 physical components—a “housing” with an “interior cavity”—to apply the natural
17 germicidal properties of light and achieve the stated goal of sanitizing an object.
18 Although the housing may be necessary to contain or aim the light, it performs no
19 unconventional function and adds no technological substance to the claim. As in *Yu*,
20 reliance on conventional components, no matter how “vital”, does not transform
21 Representative Claim 1 into patent-eligible subject matter, and they therefore fail *Alice*
22 step two. *Compare Yu*, 1 F.4th at 1042, 1045 (plaintiff argued claim language including
23 “a first and second image sensor” and “analog-to-digital converting circuitry” was
24 “vital,” but the court found this was insufficient to confer eligibility) *with* Dkt. 1, Ex.
25 A, Cls. 1, 6, 10, 11 (claim language comprises entirely of a “germicidal light source”
26 and a number of “walls”).

27 Lastly, treating Representative Claim 1 as patent eligible would improperly
28 preempt an entire field of basic sanitization using germicidal light. The sweeping

1 breadth of the '061 Patent effectively covers any multi-sided enclosure equipped with
2 a germicidal light source for sanitizing an object and therefore encompasses countless
3 ordinary and longstanding uses of light-based disinfection, from consumer appliances
4 to industrial and medical settings. Claims that would “pre-empt use of [a] basic
5 approach in all fields” and thereby “grant a monopoly over an abstract idea or natural
6 phenomenon” cannot satisfy *Alice* step two. *Bilski v. Kappos*, 561 U.S. 593, 612 (2010);
7 *see also DDR Holdings, LLC v. Hotels.com, L.P.*, 773 F.3d 1245, 1259 (Fed. Cir. 2014)
8 (eligibility exists only where claims “do not attempt to pre-empt every application of
9 the idea”). Granting exclusivity here would hand Plaintiff a monopoly over the basic
10 act of placing an object in an enclosure and exposing it to germicidal light, a routine
11 practice that long predates the '061 Patent and lies beyond the proper scope of patent
12 protection.

13 Accordingly, the '061 Patent impermissibly monopolizes the use of naturally
14 occurring germicidal light to sanitize objects, without any claimed technological
15 improvement, inventive application, or non-routine implementation, and is therefore
16 ineligible under § 101.

17 **B. No Questions Of Fact Preclude Dismissal Under § 101.**

18 Section 101 motions are frequently, and correctly, decided as a matter of law.
19 *See, e.g., Maxell*, 2023 WL 3431898 at *8; *Apollo Fin*, 190 F. Supp. 3d at 947. In fact,
20 where, as here, “the claims and specification” confirm the lack of an inventive concept,
21 dismissal under Rule 12(b)(6) is proper, regardless of allegations in the Complaint or in
22 opposition to this Motion to the contrary. *See ChargePoint*, 920 F.3d at 776 (affirming
23 dismissal under Rule 12(b)(6)); *see also Athena Diagnostics*, 915 F.3d at 755–56
24 (affirming dismissal under Rule 12(b)(6) despite the “allegations in the expert
25 declaration”).

26 Although the § 101 inquiry may occasionally involve “underlying issues of fact,”
27 *Berkheimer*, 881 F.3d at 1365, a plaintiff may not manufacture a factual dispute simply
28 by pleading or arguing that “the claim limitations involve more than performance of

1 well-understood, routine and conventional activities previously known to the industry,”
2 *id.* at 1367 (internal quotation marks and brackets omitted). Under *Berkheimer*, a
3 factual dispute about inventiveness may exist only where there are improvements
4 detailed in the specification and captured by the claims. 881 F.3d at 1369. Here, the
5 Complaint does not include any allegations of inventiveness, and the specification and
6 claims of the ’061 Patent do not support any allegations of inventiveness; to the
7 contrary, the intrinsic evidence confirms that the patent does not recite an inventive
8 concept, as explained above.

9 **IV. CONCLUSION**

10 For the foregoing reasons, Hyundai respectfully requests that the Court dismiss
11 Plaintiff’s Complaint with prejudice.

12
13 Dated: January 14, 2026

PILLSBURY WINTHROP SHAW PITTMAN LLP

14
15 /s/ Christopher Kao

Christopher Kao

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17 Attorneys for Defendant
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CERTIFICATE OF COMPLIANCE

The undersigned, counsel of record for Defendant Hyundai Motor America, certifies that this brief contains 5920 words, which complies with the word limit of L.R. 11-6.1.

/s/ Christopher Kao
Christopher Kao