Exhibit 2005
Germ Dome Industries LLC
PGR2026-00030
Hyundai Motor America Inc. v.
Germ Dome Industries LLC

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CIVIL MINUTES – GENERAL

Case No. 8:25-cv-02593-FWS-DFM Date: March 6, 2026
Title: Germ Dome Industries LLC v. Hyundai Motor America

Present: **HONORABLE FRED W. SLAUGHTER, UNITED STATES DISTRICT JUDGE**

Rolls Royce Paschal	N/A
Deputy Clerk	Court Reporter

Attorneys Present for Plaintiff:	Attorneys Present for Defendants:
Not Present	Not Present

PROCEEDINGS: (IN CHAMBERS) ORDER DENYING DEFENDANT'S MOTION TO DISMISS [21]

Plaintiff Germ Dome Industries has the rights to United States Patent No. 12,296,061 (the "'061 Patent" or the "Patent"), titled "SYSTEM AND APPARATUS FOR SANITIZING A DOOR OPENING DEVICE OR OTHER POINT OF CONTACT," which issued on May 13, 2025. (Dkt. 1 (Complaint, "Compl.") ¶¶ 6, 8, Ex. A.) In this case, Plaintiff alleges Defendant Hyundai Motor America infringes the '061 Patent by "offer[ing] a vehicle called the Hyundai Sante Fe, which includes a device for sanitizing an object." (*Id.* ¶ 10; *see id.* ¶ 15.)

Before the court is Defendant's Motion to Dismiss, in which Defendant argues the Patent is invalid because it is directed to patent-ineligible subject matter, namely that it "merely invokes a natural phenomenon—the well-known germicidal properties of certain wavelengths of light—and applies it using generic, non-functional physical component." (Dkt. 21 ("Motion") at 1.)[1] 35 U.S.C. § 101 "defines the subject matter that may be patented under the Patent Act." *Bilski v. Kappos*, 561 U.S. 593, 601 (2010). It states: "Whoever invents or discovers any new and useful process, machine, manufacture, or composition of matter, or any new and useful improvement thereof, may obtain a patent therefor, subject to the conditions and requirements of this title." 35 U.S.C. § 101. "Section 101 thus specifies four independent categories of inventions or discoveries that are eligible for patent protection: processes, machines, manufactures, and compositions of matter." *Bilski*, 561 U.S. at 601. "In choosing

[1] Plaintiff opposes the Motion. (Dkt. 26.) Defendant filed a reply in support of the Motion. (Dkt. 28.)

such expansive terms" to describe what is patentable, "Congress plainly contemplated that the patent laws would be given wide scope." *Diamond v. Chakrabarty*, 447 U.S. 303, 308-09 (1980).

However, the Supreme Court has identified three implicit exceptions to § 101's broad categories of patent-eligible subject matter: "laws of nature, physical phenomena, and abstract ideas." *Alice Corp. Pty. v. CLS Bank Int'l*, 573 U.S. 208, 216 (2014). These exceptions reflect that certain discoveries "are part of the storehouse of knowledge of all men" and are "free to all men and reserved exclusively to none." *Bilski*, 561 U.S. at 602 (quoting *Funk Bros. Seed Co. v. Kalo Inoculant Co.*, 333 U.S. 127, 130 (1948)). Permitting patents on these matters might tend to impede innovation rather than promote it, thereby thwarting the patent laws' primary goal. *Alice*, 573 U.S. at 216. Patents that purport to patent these matters are therefore invalid.

The Supreme Court has set forth a two-step approach for resolving whether a patent is invalid under § 101. *Alice*, 573 U.S. at 217; *Mayo Collaborative Servs. v. Prometheus Laboratories, Inc.*, 566 U.S. 66 (2012). First, a court must "determine whether the claims at issue are directed to one of those patent-ineligible concepts." *Alice*, 573 U.S. at 217 (citing *Mayo*). A claim must not merely *involve* an abstract idea, but rather must be *directed to* one. *ChargePoint*, 920 F.3d at 767.

Second, if (and only if) the court finds that claims at issue are directed to a patent-ineligible concept, the court must determine whether there is an "inventive concept," or "additional features" that are "sufficient to ensure that the patent in practice amounts to significantly more than a patent upon the natural law itself." *Mayo*, 566 U.S. at 73. Transformation into a patent-eligible application requires "more than simply stating the abstract idea while adding the words 'apply it.'" *Alice*, 573 U.S. at 221 (cleaned up). For example, a claim may become patent-eligible when the "claimed process include[s] not only a law of nature but also several unconventional steps . . . that confine[] the claims to a particular, useful application of the principle." *Mayo*, 566 U.S. at 84.

The parties agree that Claim 1 of the '061 Patent is representative for purposes of the Section 101 analysis. (Opp. at 3; Reply at 1.) That claim says:

> What is claimed is:
> **1**. An apparatus for sanitizing an object, the apparatus comprising:
> a housing at least partially defining an interior cavity configured to accept the object, wherein the object includes a sanitizing surface, the housing including:
> a first end wall located at a first end of the interior cavity and having a first end wall interior surface at least partially defining the interior cavity;
> a sidewall extending from and integral with at least a portion of the first end wall and having a sidewall interior surface at least partially defining the interior cavity; and
> a second end wall on an opposite end of the interior cavity from the first end wall having a second end wall interior surface at least partially defining the interior cavity,
> wherein the second end wall at least partially defines an opening into the interior cavity; and
> at least one germicidal light source disposed within the interior cavity, wherein the germicidal light source provides germicidal light into the interior cavity.

(Patent at 9:38-67.) Defendant argues the Patent is directed to patent-ineligible subject matter under Section 101.

A party may challenge a claim of patent infringement by asserting that the patent purportedly infringed is invalid. In some cases, it is possible to determine patent eligibility on a Rule 12(b)(6) motion. *See Genetic Techs. Ltd. v. Merial LLC*, 818 F.3d 1369, 1373-74 (Fed. Cir. 2016). Under Federal Rule of Civil Procedure 12(b)(6), a defendant may move to dismiss a case for failure to allege "enough facts to state a claim to relief that is plausible on its face." *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 570 (2007). Although a court must accept well-

pleaded facts as true at the motion to dismiss stage, that tenet "is inapplicable to legal conclusions." *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009).

But "[t]he line between a patentable 'process[, machine, manufacture, or composition of matter, 35 U.S.C. § 101]' and an unpatentable 'principle' is not always clear." *Parker v. Flook*, 437 U.S. 584, 589 (1978). It is only appropriate to make this tricky determination on a motion to dismiss when "there are no factual allegations that, taken as true, prevent resolving the eligibility question as a matter of law." *ChargePoint, Inc. v. SemaConnect, Inc.*, 920 F.3d 759, 765 (Fed. Cir. 2019), *cert. denied,* 140 S. Ct. 983 (2020); *see Berkheimer v. HP Inc.*, 881 F.3d 1360, 1370 (Fed. Cir. 2018) (reversing even summary judgment on patent eligibility because there were genuine disputes of material fact underlying that determination). And although there is no bright-line rule absolutely requiring claim construction before deciding patent validity, "it will ordinarily be desirable—and often necessary—to resolve claim construction disputes prior to a § 101 analysis, for the determination of patent eligibility requires a full understanding of the basic character of the claimed subject matter." *Bancorp Servs., L.L.C. v. Sun Life Assur. Co. of Canada (U.S.)*, 687 F.3d 1266, 1273-74 (Fed. Cir. 2012).

The court is not persuaded that this is the sort of case where it is so clear that the Patent is directed, not toward a "process, machine, manufacture, or composition of matter," 35 U.S.C. § 101, but rather toward a "law[] of nature, physical phenomen[on], [or] abstract idea[]," *Alice*, 573 U.S. at 217, that dismissal is warranted at this time. Courts "tread carefully in construing this exclusionary principle lest it swallow all of patent law." *Id.* at 217; *Mayo*, 566 U.S. at 71 ("The Court has recognized, however, that too broad an interpretation of this exclusionary principle could eviscerate patent law."). "For 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. An invention is therefore "not rendered ineligible for patent simply because it involves an abstract concept," law of nature, or physical phenomenon; applications of such concepts, laws, and phenomena "remain eligible for patent protection." *Alice*, 573 U.S. at 217. Here, the court is not persuaded at this early stage of the proceedings that the Patent necessarily claims the "the building blocks of human ingenuity" rather than an apparatus "that integrate[s] the building blocks into something more." *Id.* (citation modified); *see Mayo*, 566 U.S. at 71-72 (quoting other cases' statements that "a process is not unpatentable simply because it contains a law of

nature or a mathematical algorithm" and "an *application* of a law of nature or mathematical formula to a known structure or process may well be deserving of patent protection"; "While a scientific truth, or the mathematical expression of it, is not a patentable invention, a novel and useful structure created with the aid of knowledge of scientific truth may be"; and "If there is to be invention from a discovery of a law of nature, it must come from the application of the law of nature to a new and useful end") (citation modified). Accordingly, the Motion is **DENIED.**[2] Defendant shall file an answer to Plaintiff's Complaint on or before **March 23, 2026**.

[2] The court finds this matter appropriate for resolution without oral argument. *See* Fed. R. Civ. P. 78(b) ("By rule or order, the court may provide for submitting and determining motions on briefs, without oral hearings."); C.D. Cal. L.R. 7-15 (authorizing courts to "dispense with oral argument on any motion except where an oral hearing is required by statute"). Accordingly, the hearing set for March 12, 2026, (*see* Dkt. 27), is **VACATED** and off calendar.