No. 23-796

IN THE

Supreme Court of the United States

FICEP CORPORATION,

Petitioner,

v.

PEDDINGHAUS CORPORATION,

Respondent.

**On Petition for a Writ of Certiorari
to the United States Court of Appeals
for the Federal Circuit**

BRIEF IN OPPOSITION

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QUESTION PRESENTED

Whether the Federal Circuit properly applied the framework set forth in *Alice Corp. Pty.* v. *CLS Bank International*, 573 U.S. 208 (2014), to claims of an information-processing patent which (i) are directed to an abstract idea; and (ii) lack any inventive concept?

RULE 29.6 STATEMENT

Respondent Peddinghaus Corporation is a privately-held corporation. Peddinghaus has no parent corporation, and no publicly-held corporation owns ten percent or more of Peddinghaus's stock.

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INTRODUCTION

In *Alice Corp. Pty.* v. *CLS Bank International*, 573 U.S. 208 (2014), the Court held that a patent claim is ineligible under 35 U.S.C. § 101 if it is directed to an abstract idea and involves nothing more than routine and conventional components organized in their ordinary and expected manner. 573 U.S. at 217-18, 225. Here, the district court properly applied *Alice* and on summary judgment found the claims of Petitioner Ficep Corporation's patent ineligible because they are directed to the abstract idea of extracting information from a computer file and transferring it to a conventional manufacturing machine, and otherwise reflect no inventive concept. Applying the same, established framework to Petitioner's information-processing patent, the Federal Circuit affirmed.

Petitioner presents a series of questions suggesting that the Federal Circuit misapplied *Alice*, or that *Alice* should be reconsidered—all supported by a contention that the patent claims at issue are directed to a manufacturing machine, as opposed to processing information. But the undisputed factual record directly contradicts this mischaracterization of Petitioner's patent, and the questions as presented do not otherwise merit this Court's review. The claims and specification of Petitioner's patent make clear that it claims the abstract idea of identifying and extracting existing data from conventional design models, and transferring that data to conventional manufacturing machines—all of which the patent acknowledges were previously performed by human operators.

The Petition thus presents no basis to disturb the decisions below. Nor does it provide a vehicle to reconsider the *Alice* framework, which followed this Court's prior decisions in *Mayo Collaborative Services* v. *Prometheus Laboratories, Inc.*, 566 U.S. 66 (2012),

Bilski v. *Kappos*, 561 U.S. 593 (2010), and their predecessors. In particular, the Petition's suggestion of inconsistency between the Federal Circuit's application of *Alice* and the Court's decision in *Diamond* v. *Diehr*, 450 U.S. 175 (1981), does not support granting review. Petitioner declaring the patent claims "statutory subject matter" does not make them so. Petitioner's conclusory contention does not render the claims eligible under *Diehr* or immune from the application of *Alice*. The claims of Petitioner's information-processing patent do not describe any specific processes for identifying, extracting, and transferring information from known design models to generic, preexisting manufacturing machines. Instead, the claims only recite executing this abstract concept more efficiently by using conventional computer technology. The petition should be denied.

STATEMENT OF THE CASE

The claims of U.S. Patent No. 7,974,719 ("the '719 patent") are directed to the abstract idea of identifying, extracting, and transferring information from a design file to a manufacturing machine. The patent seeks to claim this abstract idea as implemented on conventional computer components performing their ordinary and expected functions. While the '719 patent references a purported computerized process of automating the identification and extraction of "intersection parameters," Appx24(3:53-58, 4:4-47)—which the patent describes as information regarding how components of an object are connected or otherwise associated with each other, Appx24(4:8-14)—neither the claims nor the specification provide any guidance on how to complete that task. *See* Pet. App. 11a; Appx26(8:25-55) (representative claim 7). According to the patent, any combination of a computer-aided design ("CAD") model, generic

computer components, and a manufacturing machine (all of which the specification acknowledges are conventional) will do. Indeed, far from requiring an inventive or unconventional process for identifying and extracting information from CAD models, the specification describes simply copying such information, including intersection parameters, from where they are already present in existing CAD models, and passing that information to any type of generic manufacturing machine that could be used to manufacture the components of an object. Appx24(4:28-35, 4:48-51); Appx25(6:3-20).

The '719 patent purports to improve upon the mental process of identifying and extracting design parameters and converting them to machine instructions, which previously had been performed by a human operator. Appx23(1:37-2:5); Appx157 (Petitioner stating that "[t]he patented invention relates to the analysis of electronic versions of construction plans"). The patent suggests replacing the human operator with generic computer hardware that can automatically "identify" and "extract" information—including intersection and manufacturing parameters—from a design model. Appx24(3:53-58, 4:4-47).

But the '719 patent does not claim[1] or describe specialized hardware or any particular algorithm or procedure for identifying and extracting the dimensions and intersection parameters from the

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[1] The representative claim of the '719 patent recites:

7. An apparatus for automatic manufacture of an object, comprising:

a computing device adapted to create a design model of an object having multiple individual components, at least two of the individual components defining an intersection at which the two components are in contact with one another;

at least one programmable logic controller in communication with the computing device and with at least one manufacturing machine;

a receiver associated with the programmable logic controller for receiving the design model of the object;

a database unit adapted to store the design model received at the receiver;

a processor which is associated with the programmable logic controller and extracts from the design model a plurality of dimensions of components which define a plurality of components of the object;

wherein the processor identifies a plurality of intersection parameters which define the intersection of the two components;

wherein the processor extracts from the design model the intersection parameters;

a transmitter associated with the processor for transmitting the intersection and machining parameters and the component dimensions from the programmable logic controller to the at least one manufacturing machine; and

wherein the at least one manufacturing machine manufactures the components based at least in part on the transmitted component dimensions and on the transmitted intersection and manufacturing parameters.

Appx26(8:25-55).

design model. Appx26(8:25-55). Instead, the specification explains that the invention merely replaces a human operator with a "programmable logic controller," which is defined as "[a]ny device capable of processing a design model." Appx25(5:31-62). The specification provides no other details on the requirements of such a "device," other than to declare that "the method" of the invention encompasses "extract[ing] from the design model the intersection and/or manufacturing parameters" by simply *copying or recording* the intersection parameters … and all the other data, *which are present in the design model and are not lost.*" Appx24(4:28-35) (emphases added).

The specification confirms that human operators of the prior art extracted this same information from design models and transferred it to manufacturing machines, and that the claimed invention need not generate new information or perform this task differently than the human operators did. Appx23(2:2-5) ("[T]he systems and methods of the present invention may be based on information included as part of existing computer-aided designs.").

The '719 patent also makes clear that the information identified and extracted from design files has long been "included as part of existing computer aided designs." Appx23(2:2-5); *see also* Appx23(1:17-25) (listing contents of existing design models). In particular, the specification explains that "all specifications associated with points of intersection between components … are included as part of the design model." Appx25(6:63-67). *See also* Appx25(5:17-26) (the design model "typically includes additional specifications, such as the dimensions of the individual components that make up the object and the way in which the individual components are mutually associated where they intersect"); Appx25(6:28-33)

("The components are generally in contact with other components and the components are in contact with each other at the intersection points in a specific manner. The design model typically includes specification and tolerance levels related to the points of intersection between components."). And the patent explains that the invention uses the same "standard design model of the object" found in the prior art. Appx26(7:30-33).

The claims reference a "manufacturing machine" as the destination for this extracted information. Appx26(8:25-55). As Petitioner has explained, these "manufacturing machines" are what human operators would "manually program" in the prior art. Appx477. The patent does not describe any new kind of "manufacturing machine." Rather, it explains "manufacturing machine" as "a machine, such as a machine which forms a part of an assembly line, which assembles, marks out and/or welds, builds or creates all or part of the object to be manufactured or a component of the object," all of which the specification explains was well-known in the prior art. Appx25(6:3-8); *see* Appx23(1:14-58) (admitting "manufacturing machines associated with an assembly line" are part of the prior art).

Petitioner filed a complaint against Peddinghaus Corporation ("Peddinghaus") alleging infringement of the '719 patent in the United States District Court for the District of Delaware in 2019. Pet. App. 20a. In 2022, the district court granted Peddinghaus's motion seeking summary judgment of ineligibility under Section 101. *Id.* at 19a-20a. The district court first found that the claims of the '719 patent were "directed to the abstract idea of identifying, extracting, and transferring data from a design file for the purpose of manufacturing an object." *Id.* at 35a. The district court

then held that "[t]he claims' high level of generality is not supplemented with any detail or additional features that exceed simply reciting the abstract idea." *Id.* at 40a. The district court addressed all of the extrinsic evidence Petitioner offered, and properly concluded that it did not present any genuine issues of material fact impacting the eligibility analysis.[2] *Id.* at 37a, 38a-39a n.4, 39a-40a.

The Federal Circuit affirmed, appropriately focusing its Section 101 analysis on the claim language and specification. *Id.* at 17a-18a. The panel first addressed whether the claims were directed to an abstract concept, and agreed with the district court that "the focus of the claimed advance … is automating a previously manual process of transferring information from a CAD design model to a manufacturing machine," which "is not sufficient for patent eligibility." *Id.* at 8a-9a ("The '719 patent is a quintessential do it on a computer patent") (quotation marks omitted). The Federal Circuit then considered whether the claim elements transformed the claims

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[2] There is no basis for Petitioner's contention that it "is entitled to a determination by a jury of whether Peddinghaus carried its burden to prove the claims not-inventive." Pet. 44. Patent eligibility is a question of law that may be determined on summary judgment based on the intrinsic record and claim language. *See, e.g.*, *Alice*, 573 U.S. at 227 (affirming Federal Circuit decision that had affirmed the district court's resolution of eligibility on summary judgment). The district court correctly found that the '719 patent's only alleged advance over the prior art is the abstract idea of identifying and extracting existing data from conventional design models, and transferring that data to conventional manufacturing machines. Further, the district court considered each of Petitioner's arguments, and, to the extent Petitioner suggested there were any factual disputes, resolved them in Petitioner's favor. *See* Pet. App. 33a n.2, 36a-37a, 38a-39a n.4.

into a patent-eligible application, and also correctly found that "the claims here do not recite any specific means or method for deriving intersection parameters." *Id.* at 13a. The Federal Circuit held that the patent only "recites generic, conventional elements of a computing device, a programmable logic controller, a receiver, a database unit, a processor, a transmitter, and a manufacturing machine." *Id.* at 16a. Citing the Court's holding in *Diehr* that "insignificant post-solution activity will not transform an unpatentable principle into a patentable process," 450 U.S. at 191-92, the panel found that "the recited generic manufacturing machine that manufactures the component based on received data is no different than the conventional machine and, in the context of this claim, is merely post-solution activity." Pet. App. 16a. The Federal Circuit thus affirmed the district court's summary judgment ruling. *Id.* at 18a. On October 23, 2023, the Federal Circuit denied Petitioner's petition for rehearing and rehearing en banc. *Id.* at 70a-71a.

REASONS FOR DENYING THE PETITION

I. THE FEDERAL CIRCUIT PROPERLY APPLIED THE *ALICE* FRAMEWORK TO CLAIMS OF AN INFORMATION-PROCESSING PATENT.

Under the *Alice* framework, a court first determines whether the claims at issue are "directed to" an abstract idea. 573 U.S. at 217. This entails examining "all claim elements, both individually and in combination" to determine if the claim's character "as a whole" is directed to an abstract idea. *See id.* at 218 n.3. "[M]ere recitation of a generic computer cannot transform a patent-ineligible abstract idea into a patent-eligible invention." *Id.* at 223. Further, if the

concept to which the claims are drawn involves "mental processes" that a human can perform in their mind or with pen and paper, the claims are directed to "basic tools of scientific and technological work" and thus "not patentable." *Gottschalk* v. *Benson*, 409 U.S. 63, 67 (1972). While patent claims reciting an abstract concept may also reference physical components, this Court has long warned against making "the determination of patentable subject matter depend simply on the draftsman's art," as doing so "would ill serve the principles underlying the prohibition against patents for 'ideas.'" *Parker* v. *Flook*, 437 U.S. 584, 593 (1978). *See also Alice*, 573 U.S. at 226-27; *Mayo*, 566 U.S. at 72.

The Federal Circuit correctly applied this Court's law to find that the '719 patent's claims are directed to the abstract idea of processing information. In particular, the panel found that "claim 7 is directed to the patent-ineligible abstract idea of extracting and transferring information from a design file to a manufacturing machine," which "can be performed by the human mind or a human using a pen and paper." Pet. App. 8a, 12a.

A. The Claims Are Directed To Processing Information, Not To A Specialized Manufacturing Machine.

Petitioner's argument that the Federal Circuit misapplied *Alice* rests on a mischaracterization of the '719 patent. Petitioner contends that the claims recite "a method of manufacturing components (like steel beams) of a larger structure (like the skeleton of a building) … and a manufacturing line for doing so." Pet. *i*. But the claims of the '719 patent do not describe a specialized method of manufacturing, a specialized manufacturing machine, or any specialized tools for

manufacturing components.[3] Rather, the claims refer only to a generic "manufacturing machine," explained in the specification as being any "machine, such as a machine which forms a part of an assembly line, which assembles, marks out *and/or* welds, builds or creates all or part of the object to be manufactured or a component of the object." Appx25 (6:3-8) (emphasis added); Appx15-16. Petitioner's patent thus describes a conventional manufacturing machine that provides a generic environment in which to carry out an abstract idea. But the Court has held that "the prohibition against patenting abstract ideas 'cannot be circumvented by attempting to limit the use of the formula to a particular technological environment.'" *Bilski*, 561 U.S. at 610 (quoting *Diehr*, 450 U.S. at 191). As the Federal Circuit observed, "the recited generic manufacturing machine that manufactures the component based on received data is no different than the conventional machine and, in the context of this claim, is merely post-solution activity." Pet. App. 16a.

Petitioner protests that the patent involves a "concrete improvement to manufacturing technology," Pet. 21, and requires the use of "large industrial machines." *Id.* at 17-20. But the fact that the patent recites steps that "'necessarily exist[] in the physical, rather than purely conceptual, realm,' is beside the point." *Alice*, 573 U.S. at 224 (citation omitted). *See id.* (holding that whether a device is "a tangible system (in § 101 terms, a 'machine')" is not dispositive of the eligibility issue). The '719 patent does not purport to claim a new type of manufacturing machine, and its

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[3] Petitioner acknowledges that the focus of the eligibility inquiry should be on the claims, Pet. 5, but repeatedly focuses its own arguments on information found nowhere in the patent, much less in the claims. *See, e.g.*, *id.* at 13-21.

final step of manufacturing components is the type of post-solution activity that is irrelevant under Section 101. *See Diehr*, 450 U.S. at 175, 191-92 ("[I]nsignificant post-solution activity will not transform an unpatentable principle into a patentable process."). The inclusion of a "machine" as a destination for the information processed by the steps of claim 7 does not render the claim eligible. *See Flook*, 437 U.S. at 593; *Alice*, 573 U.S. at 226-27; *Mayo*, 566 U.S. at 72.[4]

B. The Claims Are Not Directed To Specialized Identification Of Intersection Parameters.

The factual record refutes Petitioner's contention that "[i]ntersection parameters did not exist in CAD files before Ficep's invention." Pet. 19. The patent defines "intersection parameters" as "generally associated with an intersection or association of any two or more components." Appx24(4:8-14). Critically, the patent repeatedly states that such intersection parameters are already "present in the design model." Appx24(4:28-35). *See also* Appx23(2:2-5); Appx25(5:17-26); Appx25(6:28-33); Appx25(6:63-67); Appx26(7:29-38).

The claims require extracting intersection parameters "from the design model," Appx26(8:46-47), but as the Federal Circuit correctly found, the patent

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[4] Petitioner's assertion that "[t]he only evidence before the court was that no machines capable of using such extracted information existed in the prior art, let alone were conventional," Pet. 25, is directly contrary to the specification, Appx23(1:26-58). *See also* Pet. App. 16a-17a (explaining that "the recited generic manufacturing machine that manufactures the component based on received data is no different than the conventional machine" and that the claims do not require the features of the machine Petitioner relies upon).

does not purport to invent some new type of design model containing new forms of intersection parameters. Pet. App. 11a. Rather, the aim of the invention is to use *existing* design models containing *existing* intersection parameters as part of an automated process. *Id.* Moreover, as the Federal Circuit found, the claims "do not require any particular method of deriving intersection parameters," and in fact, Petitioner insisted that its "invention is not directed to *how* to identify intersection parameters from a design model." *Id.* at 12a-13a.

Petitioner attempts to avoid the patent's admissions that intersection parameters were present in existing design files by focusing on "scribing," and provides photographs of humans and machines marking intersection lines on steel components. Pet. 16-21. But Petitioner did not seek a claim construction limiting the claim term "intersection parameters" to scribing or to some other parameter purportedly absent from the design files of the prior art. *See* Appx1094. Regardless, Petitioner's argument that its invention requires some "new and different" use of intersection parameters is directly contradicted by the patent. *See e.g.*, Appx23(2:2-5) (explaining that "the systems and methods of the present invention may be based on information included as part of existing computer-aided designs"); Appx24(4:24-35) (explaining that intersection parameters are already "present in the design model").

Petitioner similarly suggests that its invention concerns a "marking/scribing machine" making novel use of intersection parameters. *See* Pet. 19 (alleging that before the '719 patent existed, "one had to take the component off the manufacturing line to mark it at separate layout stations"); *id.* at 16 (describing its

innovation as using intersection parameters in combination with a scribing machine "to scribe lines onto steel to indicate where one steel beam 'intersects' another"). But Petitioner never sought to construe the "manufacturing machine" of the claims as limited to a machine performing "marking" or "scribing," and any such construction would have contradicted the specification. "Scribing" is not mentioned in the specification or claims. *See* Pet. App. 15a ("[C]laim 7 does not require marking a manufacturing component, and simply recites 'manufactur[ing] the components' based at least in part on the transmitted intersection parameters.") (second alteration in original). "Mark[ing] out" intersection points, *see* Pet. 16, is a function that a "manufacturing machine" may perform, but it is not required. *See* Appx25(6:3-8) (the "manufacturing machine" is "a machine, such as a machine which forms a part of an assembly line, which assembles, marks out *and/or* welds, builds or creates all or part of the object to be manufactured or a component of the object") (emphasis added). And Petitioner admits that using intersection parameters to "scribe lines onto steel" is merely an example, and not a requirement of the claims. Pet. 16 ("An *example* in the patent of use of intersection parameters is to scribe lines onto steel to indicate where one steel beam 'intersects' another.") (emphasis added); *id.* at 18 (offering "[e]*xamples* of scribed intersections," such as "the cross section of an intersecting I-beam scribed onto a part") (emphasis added).

C. The Claims Lack Any Inventive Concept.

The '719 patent's claims do not include any "inventive concept" that would transform the abstract idea described above into a patent-eligible application of that idea. *Alice*, 573 U.S. at 217-18. The Federal Circuit correctly applied *Alice* to find that the claims

recite no more than "generic, conventional elements of a computing device, a programmable logic controller, a receiver, a database unit, a processor, a transmitter, and a manufacturing machine." Pet. App. 16a-17a. *See also Alice*, 573 U.S. at 221 ("[M]ethod claims, which merely require generic computer implementation, fail to transform [an] abstract idea into a patent-eligible invention."). The only purported advantage of the patent is one that the Court has repeatedly found insufficient to confer eligibility: accomplishing a previously human-operated task faster or more accurately with generic computing equipment. *See, e.g.*, Appx23(1:26-2:5); *Alice*, 573 U.S. at 223 ("[I]f a patent's recitation of a computer amounts to a mere instruction to 'implemen[t]' an abstract idea 'on … a computer,' that addition cannot impart patent eligibility.") (second and third alterations in original) (citation omitted); *Mayo*, 566 U.S. at 84 ("[S]imply implementing a mathematical principle on a physical machine, namely, a computer, [i]s not a patentable application of that principle.") (analyzing the holding in *Benson*, 409 U.S. at 71-73); *Bilski*, 561 U.S. at 610 ("*Flook* stands for the proposition that the prohibition against patenting abstract ideas 'cannot be circumvented by attempting to limit the use of the formula to a particular technological environment,'" such as a computer) (quoting *Diehr*, 450 U.S. at 191).

Petitioner contends that the Federal Circuit improperly held as irrelevant "*every* objective indicium of nonobviousness." Pet. 25. But the Federal Circuit properly focused its analysis on the claim language and specification, and had no obligation to consider extrinsic evidence regarding alleged "need, industry acclaim, prompt copying by competitors, customer demand, and litigation and licensing success." *Id.* As the Court in *Mayo* explained, *Bilski*, *Diehr*, *Flook*, and

Benson all "rest their holdings upon § 101, not later sections." 566 U.S. at 89. *See Diehr*, 450 U.S. at 188-89 ("The 'novelty' of any element or steps in a process, or even of the process itself, is of no relevance in determining whether the subject matter of a claim falls within the § 101 categories of possibly patentable subject matter."); *Flook*, 437 U.S. at 588 ("This case turns entirely on the proper construction of § 101 … It does not involve the familiar issues of novelty and obviousness that routinely arise under §§ 102 and 103 when the validity of a patent is challenged.").

II. THIS CASE PRESENTS NO INCON-SISTENCY BETWEEN *DIEHR* AND *ALICE*.

For the reasons noted above, the Federal Circuit correctly held the information-processing claims of the '719 patent ineligible under *Alice*, and the petition identifies no question presented by that decision meriting this Court's review. Moreover, this case does not present a vehicle to address any supposed inconsistency between the Court's decision in *Diehr* and the Federal Circuit's application of *Alice*. While Petitioner alleges such a tension exists, Pet. 28-36, it fails to establish any inconsistency in the Federal Circuit's decision here.

Petitioner requests that the Federal Circuit "be brought back in line" because it has "depart[ed] from this Court's precedent" by "abstracting claims to their 'essence' irrespective of technological improvement (through abstract idea or otherwise) and treating *Diehr* as effectively overruled." *Id.* at 33. But that does not describe the Federal Circuit's decision here.

First, contrary to Petitioner's contention that the Federal Circuit "improperly" disposed of *Diehr* by "purporting to distinguish it as pre-*Alice*," *id.* at 24, the panel addressed Petitioner's arguments and carefully

distinguished the claims of the '719 patent from those in *Diehr*. Pet. App. 13a-15a. The Federal Circuit correctly described the patent claims in *Diehr*, which were directed to a specific "physical and chemical process for molding precision synthetic rubber products" implemented using specific tools, 450 U.S. at 177, 184, as reciting "specific means for technological improvements." Pet. App. 14a. The Federal Circuit noted that, viewed in terms of the *Alice* framework, "the *Diehr* claims were directed to an improvement in the rubber curing process, not a mathematical formula." *Id.* at 14a n.6 (citation omitted).[5] The Federal Circuit found that, by contrast, the claims of the '719 patent "do not recite *any* means of technical improvements to an existing process," *id.* at 15a (emphasis added), "do not recite *any* specific means or method for deriving intersection parameters," *id.* at 13a (emphasis added), and "do not contain an inventive concept." *Id.* at 16a.

Second, the Federal Circuit neither "effectively overruled" *Diehr*, Pet. 33, nor questioned whether it remains good law post-*Alice*. The panel did the opposite. It cited *Diehr* multiple times throughout the opinion, including for support in concluding that the '719 patent lacks any inventive concept because "the recited generic manufacturing machine that manufactures the component based on received data is no different than the conventional machine and, in the context of this claim, is merely post-solution activity." Pet. App. 16a.

Third, as described in the Statement of the Case and Section I.A. above, the '719 patent is an information-

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[5] The version of the *Diehr* claim offered by Petitioner, Pet. 8 n.3, is truncated to remove technical steps that go beyond merely claiming a mathematical equation.

processing patent akin to the patent this Court held ineligible in *Alice*. The patent claims in *Alice* were "designed to facilitate the exchange of financial obligations between two parties by using a computer system as a third-party intermediary." 573 U.S. at 213. The '719 patent similarly concerns using a computer to extract information from a CAD file and transfer it to a conventional manufacturing machine.

Accordingly, Petitioner's call to reconsider *Alice* in light of *Diehr* has no basis in the Federal Circuit's decision and no connection to the facts of this case.

CONCLUSION

For the foregoing reasons, the petition for a writ of certiorari should be denied.

Respectfully submitted,

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