

ORIGINAL

No. _____

25-6646

FILED
JAN 15 2026
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SUPREME COURT, U.S.

IN THE
SUPREME COURT OF THE UNITED STATES

Noah Healy — PETITIONER
(Your Name)

vs.

John A. Squires, Under Secretary of Commerce — RESPONDENT(S)
for Intellectual Property and Director, United States Patent and Trademark Office
ON PETITION FOR A WRIT OF CERTIORARI TO

Court of Appeals for the Federal Circuit
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Noah Healy

(Your Name)

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(Address)

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(City, State, Zip Code)

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(Phone Number)

QUESTION(S) PRESENTED

Whether an Article III court may affirm an administrative agency decision while dismissing un rebutted record evidence as “unpersuasive,” without providing any explanation sufficient to permit meaningful judicial review under the Administrative Procedure Act.

Whether an Article III court may affirm an administrative agency decision that rests on contradictory statutory determinations, without reconciling those inconsistencies or providing an explanation sufficient to permit meaningful judicial review under the Administrative Procedure Act.

LIST OF PARTIES

- All parties appear in the caption of the case on the cover page.
- All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

RELATED CASES

Motor Vehicle Mfrs. Ass'n v. State Farm Mut. Auto. Ins. Co., 463 U.S. 29 (1983).

Encino Motorcars, LLC v. Navarro, 579 U.S. 211 (2016).

SEC v. Chenery Corp., 318 U.S. 80 (1943).

SEC v. Chenery Corp., 332 U.S. 194 (1947).

Florida Power & Light Co. v. Lorion, 470 U.S. 729 (1985).

Dickinson v. Zurko, 527 U.S. 150 (1999).

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IN THE
SUPREME COURT OF THE UNITED STATES

PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

OPINIONS BELOW

For cases from **federal courts**

The opinion of the United States court of appeals appears at Appendix A to the petition and is

reported at

https://www.cafc.uscourts.gov/opinions-orders/24-2311.OPINION.8-7-2025_2555100.pdf

has been designated for publication but is not yet reported; ^{or,}

is unpublished.

The opinion of the United States district court appears at Appendix B to the petition and is

reported at

<https://data.uspto.gov/ui/patent/ptab-files/APP/2023/002702/f93ce997-7585-4b4a-b5d3-97ef896f56c1.pdf>;

has been designated for publication but is not yet reported;

is unpublished.

For cases from **state courts**

The opinion of the highest state court to review the merits appears at Appendix _____ to the petition and is

reported at _____; or,

has been designated for publication but is not yet reported; ^{or,}

is unpublished.

The opinion of the _____ court appears at Appendix _____ to the petition and is

reported at _____; or,

has been designated for publication but is not yet reported; ^{or,}

is unpublished.

1.

JURISDICTION

For cases from **federal courts**

The date on which the United States Court of Appeals decided my case
Was 08/07/2025.

No petition for rehearing was timely filed in my case.

A timely petition for rehearing was denied by the United States Court of Appeals on the following date: 10/17/2025, and a copy of the order denying rehearing appears at Appendix C.

An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. ____A _____.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

For cases from **state courts**

The date on which the highest state court decided my case was _____.
A copy of that decision appears at Appendix _____.

A timely petition for rehearing was thereafter denied on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. ____A _____.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

U.S. Const. art. III, § 1

U.S. Const. amend. V

U.S. Const. art. I, § 8, cl. 8

35 U.S.C. § 101

5 U.S.C. § 706(2)(A)

STATEMENT OF THE CASE

A. The Patent Application and Initial Examination

Petitioner filed a patent application directed to a machine-mediated system for coordinated market operation. During prosecution, the application underwent substantive examination under 35 U.S.C. § 101. The United States Patent and Trademark Office initially rejected the claims. Petitioner responded with evidence and argument addressing that determination. The rejection was withdrawn, and the application was subsequently allowed.

B. Withdrawal, Reconsideration, and Contradictory § 101 Determinations

After allowance, the USPTO withdrew the application from issue based on a § 101 utility rejection. The agency later re-allowed the application and then withdrew it again, issuing a new § 101 rejection based on a different statutory theory. The later rejection asserted that the same claimed invention was ineligible as an abstract idea, notwithstanding the earlier withdrawal of the utility-based rejection and the intervening allowance. The record thus contained mutually inconsistent statutory determinations concerning the same claims.

C. PTAB Appeal and Narrowing of the Issues

Petitioner appealed to the Patent Trial and Appeal Board. In its decision, the PTAB reinstated an earlier § 101 rejection that had previously been withdrawn during prosecution, without addressing the evidence that had led to that withdrawal. At the same time, the PTAB limited the scope of the record evidence and arguments it would consider on appeal, while relying on statutory theories that had not been maintained in the final stages of examination. The PTAB did not reconcile its analysis with the application's allowance history or explain how reinstating a withdrawn rejection satisfied the requirement of reasoned decision-making.

D. Federal Circuit Decision

On appeal, the Federal Circuit affirmed in a nonprecedential decision. The court acknowledged that petitioner had raised additional arguments but concluded that they were "unpersuasive," without addressing their substance or explaining why the record evidence supporting them was insufficient. The court did not reconcile the agency's contradictory statutory determinations or explain how affirmance was consistent with the requirement of reasoned decision-making.

A petition for rehearing was denied.

REASONS FOR GRANTING THE PETITION

A. The Decision Below Conflicts with This Court's Requirements for Reasoned Decision-Making Under the APA This Court has repeatedly held that both agencies and reviewing courts must provide explanations sufficient to permit meaningful judicial review. An agency must "examine the relevant data and articulate a satisfactory explanation for its action," and a reviewing court must ensure that this requirement is met.

Motor Vehicle Mfrs. Ass'n v. State Farm, 463 U.S. 29, 43 (1983).

Here, the Federal Circuit affirmed an agency decision while dismissing un rebutted record evidence as "unpersuasive," without providing any explanation for that conclusion. Such affirmance prevents meaningful review and is incompatible with the APA's core requirements. This case presents a clean vehicle to address whether an Article III court may supply deference where the agency's reasoning, and the court's own, is unexplained.

B. The Federal Circuit Affirmed Mutually Inconsistent Agency Positions Without Reconciliation The record reflects that the USPTO issued contradictory statutory determinations concerning the same claims, withdrawing one § 101 rejection, allowing the application, and later reviving a different § 101 theory without explanation.

This Court has made clear that unexplained inconsistency in agency decision-making is itself a reason for finding agency action arbitrary and capricious.

Encino Motorcars, LLC v. Navarro, 579 U.S. 211, 221–22 (2016).

The Federal Circuit affirmed without reconciling these inconsistencies or explaining why they did not matter. Whether such affirmance satisfies the APA is a recurring and important question warranting this Court's review.

C. The Questions Presented Are Recurring, Important, and Do Not Require Merits Resolution The questions presented do not ask this Court to resolve the substantive scope of § 101 or to adjudicate the technical merits of petitioner's invention. They ask only whether judicial review may proceed in the absence of explanation and reconciliation.

These issues arise frequently in administrative adjudication and have implications far beyond patent law. Granting certiorari would permit this Court to clarify the minimum requirements of reasoned decision-making without reaching underlying merits questions.

D. This Case Is an Appropriate Vehicle

The issues were squarely presented below, preserved through rehearing, and resolved in a manner that turns entirely on procedural sufficiency. The nonprecedential nature of the decision does not diminish the importance of the questions presented, particularly where they concern the structural integrity of judicial review.

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,
Noah Healy
Petitioner, pro se

Date: 1/14/2026 _____