No. 16-1288

IN THE

Supreme Court of the United States

SYNOPSYS, INC.,

Petitioner,

v.

MENTOR GRAPHICS CORPORATION,

Respondent.

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

BRIEF OF *AMICUS CURIAE* THE INTELLECTUAL PROPERTY LAW ASSOCIATION OF CHICAGO IN SUPPORT OF NEITHER PARTY

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INTEREST OF *AMICUS CURIAE*[1]

Founded in 1884, the Intellectual Property Law Association of Chicago ("IPLAC") is the country's oldest bar association devoted exclusively to intellectual property matters. Located in Chicago, a principal locus and forum for the nation's authors, artists, inventors, scholarly pursuits, arts, creativity, research and development, innovation, patenting, and patent litigation, IPLAC is a voluntary bar association of over 1,000 members with interests in the areas of patents, trademarks, copyrights, and trade secrets, and the legal issues they present. Its members include attorneys in private and corporate practices before federal bars throughout the United States, as well as the U.S. Patent and Trademark Office and the U.S. Copyright Office. IPLAC represents both patent holders and other innovators in roughly equal measure. In litiga-

[1] In accordance with Supreme Court Rule 37.6, IPLAC states that this brief was not authored, in whole or in part, by counsel to a party, and that no monetary contribution to the preparation or submission of this brief was made by any person or entity other than IPLAC and its counsel. In addition to the required statement, IPLAC adds that after reasonable investigation, IPLAC believes that (i) no member of its Board or Amicus Committee who voted to file this brief, or any attorney in the law firm or corporation of such a member, represents a party to the litigation in this matter, (ii) no representative of any party to this litigation participated in the authorship of this brief, and (iii) no one other than IPLAC, or its members who authored this brief and their law firms or employers, made a monetary contribution to the preparation or submission of this brief.

tion, IPLAC's members are split roughly equally between plaintiffs and defendants.[2] As part of its central objectives, IPLAC is dedicated to aiding in the development of intellectual property law, especially in the federal courts.[3]

SUMMARY OF THE ARGUMENT

Legal doctrines must follow established rubrics in order to effectively and predictably develop precedent. *See, e.g.,* Jeromy Waldron, Stare Decisis and the Rule of Law: A Layered Approach, 111 Michigan Law Review 1 (2012), at 9, 13-14, and 28 (quoting Aristotle that "the habit of lightly changing the laws is an evil"). When that fails, not only are individual rights improperly lost, but once predictability has been largely eroded, the cumulative loss of those rights affects the quality of the legal system.

The instant case, just as many other decisions struggling with the post-*Alice* implementation of 35 U.S.C § 101, affects the quality of the patent system. The ability of innovators to be rewarded for their efforts is in grave jeopardy. The courts' wide ranging applications of the two-step *Alice* test have resulted in the severe erosion of predictability about what types of inventions remain patent eligible. *See, e.g.,* Intellectual Property Owners Association Section 101 Legislation Task Force, Proposed Amendments to Patent

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[2] Pursuant to Supreme Court Rule 37.2, counsel of record for the parties received timely notice of the intent to file this brief under the Rule and consent was granted.

[3] Although over 30 federal judges are honorary members of IPLAC, none of them was consulted or participated in any way regarding this brief.

Eligible Subject Matter Under 35 U.S.C. § 101, Feb. 7, 2017 ("The analysis developed in the 101 Decisions is contrary to Congressional intent, too restrictive, technologically incorrect, unsound from a policy standpoint, and bad law.").

The lack of a settled scope for determining patent eligibility has resulted in a swath of patent invalidations. In fact, after the Court's decisions in *Alice* and *Mayo*, lower courts have invalidated patents based on a lack of eligibility under 35 U.S.C. § 101 at unprecedented rates. *See, e.g.,* Robert Sachs, A Survey of Patent Invalidations Since *Alice*, Jan. 13, 2015, https://www.law360.com/articles/604235/a-survey-of-patent-invalidations-since-alice; Robert Sachs, Two Years After *Alice*: A Survey of the Impact of a "Minor Case" (Part 1), http://www .bilskiblog.com/blog/2016/06/two-years-after-alice-a-survey-of-the-impact-of-a-minor-case.html (collectively, "Sachs Articles"); Decoding Patent Eligibility Post-*Alice*, Patent Eligibility Case Analysis Tool, last visited May 29, 2017, https://www.fenwick.com /pages/post-alice.aspx.

Since the Court's June 19, 2014 *Alice* decision, at the Federal Circuit alone, there have been about 52 written decisions dealing with Section 101, but only seven (7) of them have upheld patent claims as patent eligible. That means 86% of cases appealed on Section 101 result in a written decision finding invalidity. *See e.g.,* fastcase.com and westlaw.com (date restricted and search of 35 U.S.C. § 101, duplicates and irrelevant cases removed) last visited May 29, 2017. In addition, nearly 50% of the Federal Circuit's patent docket is resolved by summary affirmance, *i.e.*, affirmance without written decision, *see,* Fed. R. App. P.

36. *See, e.g.,* Gene Quinn, Does the Federal Circuit's use of Rule 36 call into question integrity of the judicial process?, IP Watchdog (Feb. 14, 2017), http://www.ipwatchdog.com/2017/02/14/fed-eralcircuit-rule-36-integrity-judicialprocess/id=78261/; *see also* Gene Quinn, Rule 36 Judgment: The growing problem of one word affirmance by the Federal Circuit, IP Watchdog (Aug. 22, 2016), http://www.ipwatchdog.com/2016/08/22/rule-36-judg-ment/id=72108/. Estimating an additional 50% of Section 101 summary affirmances, the actual number of Federal Circuit cases where patent claims have been held not patent-eligible since June 2014 is at least around 75-80, resulting in over a 90% rate of invalidation for lack of patent eligibility just at the Federal Circuit since *Alice*. *See* 35 U.S.C. § 101.[4] Does it make sense that there could be that many patents that do not satisfy section 101, or is something wrong with the courts' application of Section 101 methodology? This appears especially so when the Court has noted that the *Mayo/Alice* formulation provides a meaningful first-stage filter for further analysis.

Before the damage to our innovating economy becomes irreversible, the Court should recognize the

[4] Possibly even more disturbing, these cases never make it to a jury. They are dismissed on the pleadings before any evidence has been developed or at the summary judgment stage. *See* Robert R. Sachs, *AliceStorm Update February 2017*, Milkable (Mar. 16. 2017), http://www.bilskiblog.com/blog/2017/ 03/alicestorm-update-february-2017.html. (noting that the success rate on motions on the pleadings is 62.3% as of February 28, 2017).

courts' ongoing misinterpretations of post-*Alice* patent eligibility jurisprudence and provide the appropriate protection to innovators.

ARGUMENT

I. THE LACK OF A SETTLED RUBRIC FOR DETERMINING PATENT-ELIGIBILITY HAS RESULTED IN CONTRADICTORY FEDERAL CIRCUIT DECISIONS.

A. Some Section 101 decisions are based on analogies extrinsic to the claim language, while others, such as this one, fail to credit anything but the claim language.

Many post-*Alice* Federal Circuit decisions have failed to do any sort of claim analysis and invalidated the patent claims (or even entire patents) based on an extrinsic, generalized understanding of what the patents allegedly mean (hereinafter, "extrinsic analogy" cases). *See, e.g., Intellectual Ventures I LLC. v. Symantec Corp.*, 838 F.3d 1307, 1317 (Fed. Cir. 2016) (analogizing claims to software management of e-mail to a "corporate mailroom."); *Recognicorp, LLC v. Nintendo Co.*, No. 12-1863 (W.D. Wash. 2015) (analogizing computer method for creating a composite image to "painting by numbers"); *Evolutionary Intelligence v. Sprint Nextel, et al.*, No. 16-1188 (Fed. Cir. 2017) (analogizing claims limited to artificial intelligence as applied to computers to "age old operation of libraries," "coffee barista," and "dinosaur toys"); *see also* Robert R. Sachs, USPTO Updates Alice Guidance with Examiner Instructions, More Work Needed (May

9, 2016), http://www.bil-skiblog.com/blog/ab-stract-ideas/ (stating that The *Alice* test may well be called Death by Analogy). Many of these decisions invalidating patents as not patent eligible under section 101 are made early in the case before any claim construction has been done and before the discovery of any evidence.

In contrast, in the decision at issue, the Federal Circuit took an overly rigid view of the claim language in determining Section 101 compliance, divorced from the remainder of the intrinsic record:

> The § 101 inquiry must focus on the language of the Asserted Claims themselves. (citations omitted).
>
> On their face, the claims do not call for any form of computer implementation of the claimed methods.

Cert. Pet. Appx. at 20a. The Federal Circuit decided that without specific language limiting the claims to a computer, the claims failed to satisfy Section 101 as being abstract. Appx. at 20a-21a. Yet, the specification clearly set forth the field of the invention as limited to computer implementations. U.S. Pat. No. 5,530,841, 1:29-35 (the "'841 Patent").

In sharp contrast to the Federal Circuit's "extrinsic analogy" line of patent-ineligible cases that invalidate based on something far removed from the claims, here, the court limited its review to the claims without consideration of their context within the specification, much less the intrinsic record. Appx. 20a. Other Federal Circuit decisions have also taken this narrow approach. *See, e.g., Accenture Global Servs. GMBH v. Guidewire Software, Inc.*, 728 F.3d 1336, 1345 (Fed.

Cir. 2013) ("[T]he important inquiry for a § 101 analysis is to look to the claim."); *Dealertrack, Inc. v. Huber*, 674 F.3d 1315, 1334 (Fed. Cir. 2012) ("The fact that certain algorithms are disclosed in the specification does not change the outcome. In considering patent eligibility under § 101, one must focus on the claims.").

Although the court went out of its way to note that the invention was designed to be performed by computer, *i.e.*, a software implementation of a solution to a known problem, that was not enough for patent eligibility. Appx. at 3a. (citing the patent specification multiple times and noting that "[t]he introduction of HDLs *necessitated the development of computerized design tools* that could translate the functional description of logic circuit into a detailed design for fabrication." (emphasis added)). Rather, the court then ignored the specification's subject matter teaching and held the claim to be abstract as *not limited* to a computer:

> A review of the actual claims at issue shows that they are directed to the abstract idea of translating a functional description of a logic circuit into a hardware component description of the logic circuit. (footnote omitted)

Appx. at 1a. But "translating a functional description of a logic circuit to a hardware component description of a logic circuit" hardly seems abstract. Rather, it is a specific description of a solution to a problem in the computer software and hardware environment. *See, e.g., Alice*, 134 S.Ct. at 2358; *Diamond v. Diehr*, 450 U.S 175, 178 (1981). Indeed, it is the type of analysis

envisioned by the Court to be eligible for patent protection: solving a technological problem in "conventional industry practice." *Diehr*, 450 U.S. at 177, 178.

Basing its invalidity decision on the lack of limiting subject matter specified in the claims, the Federal Circuit improperly overlaps the reach of Section 101 into Sections 102 and 103. Other Federal Circuit decisions have done the same. *See, e.g., I/P Engine, Inc. v. AOL Inc.*, 576 Fed. Appx. 982, 986, 994 (Fed. Cir. 2014) (Where the majority opinion is an analysis of obviousness but Judge Mayer's concurring opinion rested his analysis on patent eligibility); see also *Versata Dev. Grp., Inc. v. SAP America, Inc.*, 793 F.3d 1306, 1333 (Fed. Cir. 2015); *but see Mayo*, 132 S.Ct. at 1304 (recognizing potential overlap of Sections 101 and 102, but not proscribing a Section 102 type analysis when evaluating Section 101). Yet, Section 101 is not all encompassing because the remainder of the patentability sections of the Statute follow Section 101 and provide separate invalidity tests. *See, e.g., In re Bergy*, 596 F.2d 952, 960 (C.C.P.A. 1979, Rich, Judge) (providing an analogy to the statute sections as "having the separate keys to open in succession the three doors of sections 101, 102, and 103"). If the patent claim is not sufficiently limited in its subject matter, prior art from any subject matter arguably comes in to potentially invalidate the claim under Sections 102 or 103. *See, e.g.,* 35 U.S.C. §§ 102, 103. Indeed, Section 101 is just one part of patent validity analysis. *See, e.g., Bergy*, 596 F.2d at 960. Additionally, Section 112 further protects from overbreadth. *See, e.g.,* 35 U.S.C. § 112. If the claims cover an invention not envisioned by the patentee in the specification, they may fail Section 112's enablement or written description requirements. *See id.* Section 101 was neither designed nor

intended to resolve every patent validity issue. Rather it applies a meaningful first-stage filter. *See, e.g., Alice* 134, S.Ct. at 2355.

This split in Circuit jurisprudence on patent eligibility between the use of "extrinsic analogy" at one extreme, untethered to the patent, and unduly restrictive focus to the claim language at the other extreme, eschewing even incorporation of the intrinsic record, must be resolved in order for the innovating community to achieve some certainty on what is, or is not, patent eligible. *See, e.g.,* Sachs Articles, *supra*.

B. In contrast with either extreme, reliance on extrinsic analogy or reliance solely on the claim limitations, Section 101's gatekeeping function mandates flexible consideration of patent eligible subject matter based on the patent's intrinsic record.

Because "Section 101 imposes a *threshold* condition," it need not be applied as rigidly with respect to the claims as the prior art statutory Sections 102 and 103. *See, e.g., Bilski v. Kappos*, 561 U.S. 593, 621 (2010) (emphasis added, internal quotations and citations omitted). Yet, it must be applied with consistency and reliance on the intrinsic record and the patent as a whole. *See, e.g., Thales Visionix Inc. v. United States,* 850 F.3d 1343 (Fed. Cir. 2017) (relying on specification to determine patent eligibility). In distinction, Sections 102 and 103 provide the strict claim construction and limitation analysis that the Federal Circuit improperly applied here in its Section 101 analysis. Appx. 20a-21a. Settled interpretation of the

Patent Statute has provided for the strict application of the claim limitations during analysis under Sections 102 and 103, which would make such a rigid application of Section 101 redundant.

In further support of a more flexible application than provided by the Federal Circuit here, the statutory definition of the term "process" provides no subject matter limitation:

> process, art or method, and includes a new use of a known process, machine, manufacture, composition of matter, or material.

35 U.S.C. § 100(b). Therefore, in determining whether Section 101 is met, application of the two-step *Alice* analysis should not focus on the claim language alone. *See, e.g., Gottschalk v Benson*, 409 U.S. 63, 67 (1972) (holding that application of abstract ideas "to a new and useful end" remain eligible for patent protection).

The Court-developed exceptions from eligibility under Section 101, abstractness, laws of nature, and natural phenomenon must be used in conjunction with the Section's broad application. *See, e.g., Alice*, 134 S.Ct. at 2354. The exceptions must be applied sparingly, lest they "swallow all of patent law." *Alice*, 134 S.Ct. at 2355; *see also Mayo*, 566 U.S. at 71 (too broad an interpretation of this exclusionary principle could eviscerate patent law").

Without a definition of "abstractness," courts struggle to apply the abstractness exception uniformly, and it seems to be over-applied in complex or difficult technologies, such those involving software. *See, e.g.,* fastacase.com, *supra.* Specifically, courts

struggle with where to draw the line when the claims provide an application of an abstract idea, which may well be deserving of patent protection. *See Diehr,* 450 U.S. at 187 ("an application of a law of nature or mathematical formula to a known structure or process may well be deserving of patent protection"); *Parker v. Flook,* 437 U.S. 584, 591 (1978) ("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.").

Here, the Federal Circuit's unduly rigid approach, failing to appreciate the scope of the claims in view of the patent as a whole, including the specification, improperly permitted the court to hold that the patent claims were overbroad or abstract. Appx. 20a-21a (holding that without a claim construction including requiring a computer, the claim is abstract). Yet, the specification is clear that the patent is related to "methods and systems used to convert a hardware language description to a logic circuit and . . . synthesiz[e] . . . with conditional assignments," clearly a computer application. '841 Pat., 1:29-35 (Field of the Invention).

Until this Court's recent Section 101 jurisprudence, *see, e.g., Alice Corp. v. CLS Bank Int'l*, 134 S.Ct. 2347 (2014); *Mayo v. Prometheus*, 132 S.Ct. 1289 (2012), Section 101's gatekeeping function was a first hurdle of several towards achieving a patent. Indeed, Section 101, when correctly applied lays "predicate for the other provisions of patent law." *Bergy*, 596 F.2d at 960; *see also Mayo*, 132 S.Ct. at 1303-04. Once passing Section 101, the patent or application proceeded to the

next series of hurdles, which are more rigorous. *See, id*.

The Court also recognized the gatekeeping function of Section 101 in *Mayo*, stating that:

> to shift the patent-eligibility inquiry entirely to these later sections [102 and 103] risks creating significantly greater legal uncertainty while assuming that those sections can do the work they are not required to do.

Mayo, at 1304. Even though the entirety of the claimed subject matter passes through the eligibility gate and is then evaluated for novelty and nonobviousness, there is a need for the eligibility inquiry up front. Bruce Wexler, Edwin Mok, *The Gatekeeping Function of Patent Eligibility as Part of a More Complete Understanding of* § 101 Principles (Apr. 24, 2016), https://patentlyo.com/patent/2016/04/wexler-gate keeping-eligibility.html.

II. EVEN WITHOUT SUPPORT FROM THE SPECIFICATION, *BILSKI* HELD THAT REQUIRING A SPECIFIC "MACHINE"

IS TOO NARROW AN INTERPRETATION OF SECTION 101.

A. The Patent Statute sets forth "process" as a separate category that does not require the addition of a machine, such as a computer, in the claim language.

While analysis of the patent document as a whole is preferable than limiting patent eligible subject matter to just what is provided in the claims, even if the analysis is done with sole focus on the claims, the instant claims should still survive Section 101. The Patent Act broadly defines the subject matter that may be patented as including a process without requiring a separate machine:

> 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 (emphasis added). "In choosing such expansive terms … modified by the comprehensive 'any,' Congress plainly contemplated that the patent laws would be given wide scope." *Diamond v. Chakrabarty,* 447 U.S. 303, 308, 100 S.Ct. 2204, 65 L.Ed.2d 144 (1980).

In the 1952 Patent Act, the term "process" was intentionally substituted for "art" in Section 101 and remains there today. The 1952 Act also introduced a definition of "process," *see, e.g.,* 35 U.S.C. § 100(b), *supra*, that did not *require* any other statutory category

– such as a computer or other machine. Instead, it was intended to stand on its own.[5]

The Committee Report for the 1952 Patent Act acknowledged the sweeping breadth of potentially patentable subject matter contemplated by section 101, stressing that it "may include anything under the sun that is made by man. . . ." 9 S. REP. No. 82- 1979, at 5, reprinted in 1952 U.S.C.C.A.N. 2394, 2399 (emphasis added).

Hence, while a flexible analysis of the patent document as a whole best determines patent eligible subject matter, even when a machine or computer is not present, Section 101 defines processes as a category of invention on par with machines. The statute imposes no more particular patent eligibility requirements on

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[5] The legislative history accompanying the 1952 Act explains the substitution of "process" in place of the longstanding term "art":

> [T]he word "art" which appears in the present statute has been changed to the word "process." "Art" in this place in the present statute has a different meaning than the words "useful art" in the Constitution, and a different meaning than the use of the word "art" in other places in the statutes, and it is interpreted by the courts to be practically synonymous with process or method. The word "process" has been used to avoid the necessity of explanation that the word "art" as used in this place means "process or method," and that it does not mean the same thing as the word "art" in other places.

S. REP. No. 82-1979, at 5 (1952), reprinted in 1952 U.S.C.C.A.N. 2394, 2398 (emphasis added).

processes than it does on the other categories of patentable inventions, and it is incorrect for the Federal Circuit to require application on a computer.

B. Requiring a machine or computer to be claimed, as was done here, forecloses useful innovation well beyond this case and this trend must be stopped.

Innovative, useful processes thrive in many areas beyond the "traditional" scientific and engineering fields. Today, as never before, most innovations implement software to one extent or another. *See* U.S. Gen. Accounting Office, GAO-13-465, Intellectual Property: *Assessing Factors That Affect Patent Infringement Litigation Could Help Improve Patent Quality* 13 (2013) ("By 2011 patents related to software made up more than half of all issued patents."). To remain competitive in today's information economy, companies and governments rely on new and useful software, internet, and computer processes. These software processes apply scientific, engineering, and mathematical principles in computer and software environments. These processes provide economic value and advantage to those using them. For at least these reasons, they should be rewarded, even though they often may not require a traditional machine.

However, the viability of protection of computer implemented innovations has never before been more in doubt. The U.S. Chamber International IP Index, Fifth Ed. Feb. 2017, ranks the United States as the

10th best patent system in the world, tied with Hungary.[6] http://www.theglobalipcenter.com/wp-content/uploads/2017/02/GIPC_IP_Index_2017_Report.pdf. The report specified the courts' application of Section 101 as a basis for the new ranking:

> the patenting environment in the U.S. continues to be affected by uncertainty as to how to interpret *Myriad* and other key decisions, and greater clarity, consistency, and closing of gaps with international practices is crucial to upholding a supportive innovation environment.

Id. at 120. This case highlights the judicial uncertainty around application of Section 101. Specifically, is analysis grounded in a strict review of the claims without consideration of the teaching of the specification, or should not the patent as a whole play a part in determining eligibility, or can the court rely upon entirely extrinsic analogies when determining patent eligibility? All of these directions remain viable under the current state of the law, making any sort of prediction of what the courts will do almost impossible.

Similarly, in recent remarks, David Kappos, the former U.S. Patent and Trademark Office director, stated that "patent filings in China exceeded those of the next 20 countries." *See* Erin Clark, *Venture Capital Chases Patents to Friendlier Climes*, (December 12, 2016) http://watchdog.org/283886/venture-capital -

[6] 2017 is the first year that the United States' patent system has not been ranked as the number one patent system in the world.

chases-patents-friendlier-climes/. In addition, Mr. Kappos elaborated on why that matters:

> When investment incentives are reduced, you can expect investment to move elsewhere … The U.S. no longer provides the kind of patent incentives that are necessary to invest in key industries like biotech and software. The industries that are the most positioned to advance our economy in the future are those very same industries, biotech and software.

Id. In a similar vein, investors have recognized the uncertainty of protection of innovation and the resulting innovating community's flight from the U.S.:

> Smarter investors, they're going overseas to invest because they have [venture capital] protection there. You don't have this high invalidation rate in the companies and so therefore, whether I am a seed investor or late-stage or anything in-between, you have that protection afforded.

Erin Clark, *Venture Capital Chases Patents to Friendlier Climes*, (December 12, 2016) (statement of Amit Patel Shah, Managing Director, Fortress Investment Group).

A flexible but predictable interpretation of Section 101 is needed both to support innovation in this country and to provide certainty to the scope of protection for such innovation. Until such an interpretation is available, defendants will continue to propose and courts will continue to grasp at improper procedures

both overly broad and unduly narrow to dispose of pending patent litigation. These unpredictable determinations are devastating to innovation because they wrongly destroy patent protection, which chills investment in worthy inventions. As the Court has acknowledged, neither it nor Congress intends to "freeze process patents to old technologies, leaving no room for the revelations of the new, onrushing technology." *Benson*, 409 U.S. at 71.

CONCLUSION

For the foregoing reasons, IPLAC respectfully requests that the Court grant Synopsys' Petition for Writ of Certiorari in this case to clarify the proper standards for applying 35 U.S.C. § 101.

Respectfully submitted,

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