UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CIVIL MINUTES—GENERAL

Case No. 8:26-cv-00114-KES Date: July 7, 2026

Title: OPTIMUM VECTOR DYNAMICS LLC v. SHARKNINJA OPERATING LLC

PRESENT:

THE HONORABLE KAREN E. SCOTT, U.S. MAGISTRATE JUDGE

Jazmin Dorado	Not Present
Courtroom Clerk	Court Reporter
ATTORNEYS PRESENT FOR PLAINTIFF: None Present	ATTORNEYS PRESENT FOR DEFENDANT(S): None Present

PROCEEDINGS (IN CHAMBERS): **Order GRANTING Motion to Dismiss (Dkt. 16)**

I. INTRODUCTION

Before the Court is a Rule 12(b)(6) motion (Dkt. 16) filed by Defendant SharkNinja Operating LLC ("Defendant") to dismiss the Complaint ("Compl.," Dkt. 1) filed by Plaintiff Optimum Vector Dynamics LLC ("Plaintiff") based on patent ineligibility. After the parties briefed the motion (Dkt. 17, 21, 22), the Court conducted a hearing on July 1, 2026 (Dkt. 23).

For the reasons explained below, Defendant's motion to dismiss is **GRANTED**.

II. BACKGROUND

On January 15, 2026, Plaintiff filed this patent infringement action against Defendant. *See generally*, Compl., Dkt. 1. Plaintiff alleges that Defendant infringes U.S. Patent No. 8,649,971 (the "'971 Patent") by making, using, selling, and offering to sell intelligent robotic vacuum products. *Id.* ¶ 7.

The '971 Patent, titled "Navigation Device," claims earliest priority to a Japanese patent application filed on April 2, 2008. The '971 Patent generally relates to a vehicle navigation device that provides step by step directions. *See* '971 Patent at 1:5-10. It discloses an embodiment that seeks input after determining that a vehicle has missed a waypoint along a set route. *Id.* at 2:15-22. The input enables the user to determine whether to continue on the route or turn the vehicle around. *See id.* at 11:25-29.

Claim 1 discloses:

> A navigation device comprising:
> a setting unit configured to set waypoints and a destination;
> a route searching unit configured to search for a whole route leading to the destination via the waypoints set by said setting unit;
> a route guidance unit configured to carry out route guidance according to the whole route which is searched for by said route searching unit;
> an output unit configured to output a message showing that a vehicle has deviated from a route leading to a first next waypoint toward which the vehicle has been heading when said route guidance unit determines that the vehicle has deviated from the route to a predetermined distance or more and is traveling along a route after said first next waypoint; and
> an input unit configured to input a command indicating whether or not to travel via said first next waypoint in response to the message [sic] outputted by said output unit.

'971 Patent, Claim 1.

III. LEGAL STANDARDS

A. Rule 12(b)(6).

A motion to dismiss under Federal Rule of Civil Procedure 12(b)(6) tests whether the allegations in the complaint are sufficient state a claim for relief. In deciding such a motion, the court assumes that the allegations of material fact in the complaint are true and construes them in the light most favorable to the plaintiff. *McGary v. City of Portland*, 386 F.3d 1259, 1261 (9th Cir. 2004). In deciding a motion to dismiss, a court generally may not look outside the pleadings. *Anderson v. Angelone*, 86 F.3d 932, 934 (9th Cir. 1996). The court may, however, consider exhibits attached to the complaint and material that is properly subject to judicial notice without converting the motion to summary judgment. *Lee v. City of Los Angeles*, 250 F.3d 668, 688-89 (9th Cir. 2001).

B. 35 U.S.C. § 101.

"Section 101 defines the subject matter that may be patented under the Patent Act." *Bilski v. Kappos*, 561 U.S. 593, 601 (2010). "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.

Although the Supreme Court has recognized that "[i]n choosing such expansive terms . . . Congress plainly contemplated that the patent laws would be given wide scope," it has identified three patent ineligible areas: "laws of nature, physical phenomena, and abstract ideas." *Diamond v. Chakrabarty*, 447 U.S. 303, 308-09 (1980). These exceptions are not required by the text of the statute, but are consistent with the idea that certain discoveries "are part of the storehouse of knowledge of all men" and are "free to all men and reserved exclusively to none." *Funk Bros. Seed Co. v. Kalo Inoculant Co.*, 333 U.S. 127, 130 (1948). "[T]he concern that drives this exclusionary principle [is] one of pre-emption." *Alice Corp. Pty. v. CLS Bank Int'l*, 573 U.S. 208, 216 (2014) (citation omitted). Thus, the Supreme Court requires that, "[i]f there is to be invention from such a discovery, it must come from the application of the law of nature to a new and useful end." *Funk Bros*., 333 U.S. at 130. These rules apply in the same manner to product and process claims. *Gottschalk v. Benson*, 409 U.S. 63, 67-68 (1972).

Alice expanded the two-step approach for resolving § 101 issues adopted in *Mayo Collaborative Servs. v. Prometheus Labs., Inc.*, 566 U.S. 66, 77 (2012). In the first step, 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*, 566 U.S. at 77). If this standard is satisfied, then in the second step the court must ask "[w]hat else is there in the claims." *Id.* This requires a consideration of "the elements of each claim both individually and 'as an ordered combination' to determine whether the additional elements 'transform the nature of the claim' into a patent eligible application." *Id.* (citing *Mayo*, 566 U.S. at 78–79). In performing this second step of the analysis, a court must "search for an 'inventive concept'—*i.e.*, an element or combination of elements that is 'sufficient to ensure that the patent in practice amounts to significantly more than a patent upon the [ineligible concept] itself.'" *Id.* at 217-18 (citing *Mayo*, 566 U.S. at 72–73).

"[W]hether a claim recites patent eligible subject matter is a question of law," but it is one "which may contain underlying factual determinations." *Berkheimer v. HP Inc.*, 881 F.3d 1360, 1368 (Fed. Cir. 2018) (citations omitted). One example of such a factual determination is "[w]hether something is well understood, routine, and conventional to a skilled artisan at the time of the patent." *Id.* at 1369. Thus, a complaint that properly alleges that individual elements of a claim are not well-understood, routine, or conventional, may be sufficient to state a claim notwithstanding a challenge of invalidity under § 101. *Aatrix Software, Inc. v. Green Shades Software, Inc.*, 882 F.3d 1121, 1128 (Fed. Cir. 2018).

IV. DISCUSSION

A. Representativeness.

Defendant argues that Claim 1 of the '971 Patent is representative. Memo, Dkt. 17 at 6. Plaintiff does not outright dispute that Claim 1 is representative. *See* Opp'n, Dkt. 21 at 25. Rather, Plaintiff points to allegations in the complaint discussing dependent claims. *Id.* In making its eligibility arguments, Plaintiff otherwise discusses the claims of the '971 Patent collectively. Plaintiff's approach is inconsistent with a position that Claim 1 is not representative. *See Athena*

Diagnostics, Inc. v. Mayo Collaborative Servs., LLC, 915 F.3d 743, 756 (Fed. Cir. 2019) (finding the plaintiff "waived its arguments specific to claim 6 by not making them before the district court"). Because Plaintiff failed to meaningfully dispute representativeness and opted to analyze the claims collectively, the Court finds Claim 1 representative for purposes of assessing subject matter eligibility. *Berkheimer*, 881 F.3d at 1365 ("Courts may treat a claim as representative . . . if the patentee does not present any meaningful argument for the distinctive significance of any claim limitations . . . .") (internal citations omitted); *see also Content Extraction & Transmission LLC v. Wells Fargo Bank, Nat. Ass'n*, 776 F.3d 1343, 1348 (Fed. Cir. 2014) (stating that a claim is representative where "all the claims are substantially similar and linked to the same abstract idea") (citations and quotation marks omitted).

B. Claim Construction.

Plaintiff argues that resolution of Defendant's motion is premature because it turns on a claim construction dispute. Opp'n, Dkt. 21 at 11. Plaintiff does not frame the dispute clearly. Initially, Plaintiff argues that the parties dispute whether the scope of Claim 1 is sufficiently broad to cover an autonomous system. *Id.* Plaintiff does not tie this discussion to a particular claim term or limitation. Plaintiff then argues that a claim construction dispute regarding the limitation, "an input unit" precludes resolution of Defendant's motion. *Id.* at 13. Plaintiff argues this term should take its plain and ordinary meaning. *Id*. However, plain and ordinary meaning is the default. *Mass. Inst. of Tech. v. Shire Pharms., Inc.*, 839 F.3d 1111, 1118 (Fed. Cir. 2016) ("There is a heavy presumption that claim terms are to be given their ordinary and customary meaning.") It is unclear that Defendant disputes that plain meaning applies or that plain meaning would include an autonomous system, as Plaintiff contends. Finally, Plaintiff argues that the input unit "can receive and analyze input signals and send the results to the control unit as an operation to command, which results in ***the physical control*** of the routing of the device." *Id.* at 13 (emphasis in original).

"A patentee must do more than invoke a generic need for claim construction or discovery to avoid grant of a motion to dismiss under § 101." *Trinity Info Media, LLC v. Covalent, Inc.*, 72 F.4th 1355, 1360 (Fed. Cir. 2023). "Instead, the patentee must propose a specific claim construction or identify specific facts that need development and explain why those circumstances must be resolved before the scope of the claims can be understood for § 101 purposes." *Id.* at 1360–61 (citing *Cleveland Clinic Found. v. True Health Diagnostics LLC*, 859 F.3d 1352, 1360 (Fed. Cir. 2017)); *see also Sanderling Mgmt. Ltd. v. Snap Inc.*, 65 F.4th 698, 704 (Fed. Cir. 2023) (finding district court did not err in resolving eligibility question before claim construction where the patentee did not propose any constructions).

Here, Plaintiff's claim construction arguments do not preclude resolution of Defendant's motion. Plaintiff identifies only one specific construction, which is the "physical control" language cited above. The terms "physical" and "physical control" appear nowhere in the specification of the '971 Patent. Thus, Plaintiff's proposed construction is not supported. Even if the construction were supported, the claim language would be directed to a result instead of a specific way to achieve that result. Results-oriented claim language does not confer subject matter eligibility. *SAP*

Am., Inc. v. InvestPic, LLC, 898 F.3d 1161, 1167 (Fed. Cir. 2018). Constructions that are frivolous or do not affect the *Alice* analysis do not preclude resolution of a motion to dismiss on eligibility grounds. *Sanderling*, 65 F.4th at 704.

Additionally, though Plaintiff did not clearly identify any proposed construction capturing its autonomous system argument, any such construction would also fail. The input disclosed in Claim 1 must come from a source such as a user, driver, or passenger:

> [I]t is therefore an object of the present invention to provide a navigation device superior in user friendliness that enables a user to determine how to handle a waypoint on a route which the user has not passed according to the ***user's own will***.

'971 Patent at 1:58-62 (emphasis added). There would be no need for "input" or "will" in an entirely autonomous system. Construing "input" to eliminate any entity that could provide input would defeat the purpose of the invention. Thus, this argument also does not preclude resolution of Defendant's motion. *Sanderling*, 65 F.4th at 704.

C. ***Alice*** **Step One.**

"The first stage of the *Alice* inquiry looks at the focus of the claims [and] their character as a whole." *SAP*, 898 F.3d at 1167 (quotations omitted). Here, Claim 1 of the '971 Patent is directed to the idea of a navigation device that can solicit and implement user input regarding a route after determining that a vehicle has deviated from a set route.

At the outset, the fact that representative Claim 1 is directed to a "navigation device," with physical implications does not end the eligibility inquiry. Claims reciting physical components are invalid if they "merely provide a generic environment in which to carry out the abstract idea." *In re TLI Commc'ns LLC Pat. Litig.*, 823 F.3d 607, 611 (Fed. Cir. 2016) (finding claim reciting "a telephone unit" invalid because the telephone unit merely provided a generic environment for "classifying and storing digital images in an organized manner.") Claim 1 discloses a navigation device comprising a collection of various units that are configured to achieve certain results. '971 Patent, Claim 1 (disclosing, "a setting unit," "a route searching unit," "an output unit," and "an input unit"). The claim language does not explain how the units are configured or how they achieve the particular claimed results. The specification discloses that a person having ordinary skill in the art would understand how to configure these units to achieve the disclosed results. *See id.* at 1:33-47 (discussing background art navigation devices). Still, this collection of units amounts to a generic environment used to carry out the abstract idea. These claim limitations do not transform the claim into eligible subject matter.

Further, Claim 1 is directed to a function – offering and implementing a user routing choice – but does not explain with any specificity how to accomplish that function. Such claims are not eligible. *Affinity Labs of Texas, LLC v. DirecTV, LLC*, 838 F.3d 1253, 1258 (Fed. Cir. 2016) (claims reciting a function generally, but "not a particular way of performing that function," are

directed to an abstract idea). The Federal Circuit has found and affirmed decisions finding similar claims ineligible. *Int'l Bus. Machines Corp. v. Zillow Grp., Inc.*, 50 F.4th 1371, 1378 (Fed. Cir. 2022) (finding "claims are directed to limiting and coordinating the display of information based on a user selection" ineligible); *Location Based Servs., LLC v. Niantic, Inc.*, 295 F. Supp. 3d 1031, 1047 (N.D. Cal. 2017), *aff'd*, 742 F. App'x 506 (Fed. Cir. 2018) (finding claim directed to "processing and displaying of desired mapping information based on location-based or user-based data" ineligible).

Plaintiff argues that Claim 1 is eligible because it is directed to an improvement in rooted in computer technology. Plaintiff cites *DDR Holdings, LLC v. Hotels.com, L.P.*, 773 F.3d 1245 (Fed. Cir. 2014). In *DDR* the Court found a "claimed solution [] necessarily rooted in computer technology in order to overcome a problem specifically arising in the realm of computer networks," eligible. *Id.* at 1257. The *DDR* Court cautioned that, "not all claims purporting to address Internet-centric challenges are eligible for patent." *Id.* at 1258. Claims that "merely recite the abstract idea" along with "routine additional steps" are not eligible. *Id.* (citations omitted). Here, Claim 1 is not eligible because it discloses an abstract idea realized in a generic technological environment.

Plaintiff also cites *Carrum Techs., LLC v. BMW of N. Am., LLC*, 2019 WL 1779863, at *1 (D. Del. Apr. 23, 2019) and *Jaguar Land Rover Ltd. v. Bentley Motors Ltd.*, 388 F. Supp. 3d 665, 670 (E.D. Va. 2019) in support of its position. Neither of these cases are binding authority. They are also distinguishable because both involved claims directed to specific physical vehicle changes. *Carrum*, 2019 WL 1779863m at *3 (finding claim "directed to a physical system operating in three-dimensional space that, when certain conditions are met, physically impacts the speed of a moving object"); *Jaguar*, 388 F. Supp. 3d at 679 (finding claim "physically changes the subsystems," including modifying the level of wheel spin"). Here, the claim limitations are directed to a collection of widgets configured to achieve certain results, which may have unspecified physical implications. The claims do not disclose specific physical elements like sensors or a suspension system.

For the foregoing reasons, representative claim 1 is directed to ineligible subject matter under *Alice* Step One.

***D. Alice* Step Two.**

At Step Two, the court asks, "whether the claims do significantly more than simply describe [the] abstract method and thus transform the abstract idea into patentable subject matter." *Affinity Labs*, 838 F.3d at 1262 (citing *Ultramercial, Inc. v. Hulu, LLC*, 772 F.3d 709, 715 (Fed. Cir. 2014) (internal quotation marks omitted)). The inventive concept "may arise in one or more of the individual claim limitations or in the ordered combination of the limitations." *Bascom Glob. Internet Servs., Inc. v. AT&T Mobility LLC*, 827 F.3d 1341, 1349 (Fed. Cir. 2016). As relevant at Step Two, "[w]hether the claim elements or the claimed combination are well-understood, routine, conventional is a question of fact." *Aatrix*, 882 F.3d at 1128.

Apart from the claim construction arguments, addressed above, and arguments regarding the allegations in the Complaint, discussed below, Plaintiff does not argue that any specific claim limitations provide an inventive step that transforms the claimed invention into something more than the abstract idea. Additionally, as discussed above, the disclosed claim limitations are directed to a generic technological environment. *See In re TLI*, 823 F.3d at 611.

For these reasons, representative Claim 1 does not disclose any inventive step or otherwise eligible material under *Alice* Step Two.

E. Factual Issues Precluding Resolution.

A complaint that properly alleges that individual elements of a claim are not well-understood, routine, or conventional may create an issue of fact that precludes resolution of a motion to dismiss based on lack of subject matter eligibility. *See Berkheimer*, 890 F.3d at 1372; *Aatrix*, 882 F.3d at 1128. To survive a § 101 motion, the allegations must be "specific," "plausible," and "concrete." *Cellspin Soft, Inc. v. Fitbit, Inc.*, 927 F.3d 1306, 1317-18 (Fed. Cir. 2019). Courts disregard conclusory statements when evaluating the sufficiency of the pleadings. *Simio, LLC v. FlexSim Software Prod., Inc.*, 983 F.3d 1353, 1365 (Fed. Cir. 2020).

Here, the allegations in the Complaint are conclusory and do not create a fact issue precluding resolution. *See* Compl., Dkt. 1 ¶ 14 (alleging that the '971 Patent claims "specific technological improvements" that "physically change[] vehicle systems" but failing to explain how these improvements and changes occur); ¶ 18 (alleging that claimed operations result in physical changes but not explaining how); ¶ 21 (alleging that claims result in efficiency gains but not tying the alleged improvements to specific claim language).

F. Dismissal with Prejudice.

As discussed above, Plaintiff's allegations do not raise fact issues precluding resolution here. Plaintiff's opposition brief requested leave to amend but did not identify any concrete amendments Plaintiff could make that would change this outcome. Accordingly, dismissal with prejudice is appropriate.

V. CONCLUSION

IT IS HEREBY ORDERD that, for all these reasons, Defendant's motion to dismiss (Dkt. 16) is **GRANTED**. Plaintiff's Complaint is dismissed with prejudice. Defendant shall submit a proposed judgment within 7 days.

Initials of Deputy Clerk jd