

HAWK TECHNOLOGY SYSTEMS, LLC v. CASTLE RETAIL, LLC, Appeal No. 2022-1222 (Fed. Cir. February 17, 2023). Before Reyna, Hughes, and Cunningham. Appealed from W.D. Tenn. (Judge McCalla).

Background:

Hawk held a patent to a method of viewing videos, including detailed steps of receiving and formatting videos from multiple sources. This patent had an earliest priority date from 2001, and would cover most video surveillance systems today that both stored video on a server and permitted remote video viewing on a smartphone.

Castle Retail operated a video security system that likely met the requirements of independent claim 1, but moved for dismissal under FRCP 12(b)(6). The motion to dismiss alleged that Hawk's patent was ineligible under 35 U.S.C. § 101, as being directed to an abstract idea without a practical application detailed in the claims.

The district court granted the motion, holding that the patent was directed to the abstract idea of "displaying and storing digital video taken from multiple cameras." The district court also held that the claims recited the use of generic computer elements and data manipulation, instead of a genuine technological improvement. Hawk appealed.

Issue/Holding:

Did the district court err in holding that Hawk's patent was ineligible under § 101? No, affirmed.

Discussion:

The Federal Circuit unanimously held that Hawk's patent was ineligible under § 101, generally agreeing with the analysis of the district court.

First, the Federal Circuit agreed with the district court that the claims were directed to the abstract idea of "displaying and storing digital video taken from multiple cameras." In particular, it cited the results-based functional language used in the claims. The Federal Circuit also held that Hawk could not rely on details from the specification to establish that the claims were directed to a "solution to a technical problem," and that the claims did not articulate any such technical solution.

Second, the Federal Circuit held that the claims were not a patent-eligible application of an abstract idea. The Federal Circuit highlighted vague aspects of the claims such as the requirement that different spatial and temporal parameters be used for video from different sources. The Federal Circuit asserted that these requirements were not defined in either the claims or the specification. Without these details, it could not be shown that the claims embodied an inventive application of the abstract idea. The Federal Circuit again highlighted that the claims recited an assembly of conventional components to achieve functional results.