

Recent Developments in Section 101 Cases

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CLS Bank Intern. v. Alice Corp. Pty, Ltd., 717 F.3d 1269 (Fed. Cir. 2013) (May 10)

A method of exchanging obligations as between parties, each party holding a credit record and a debit record with an exchange institution, the credit records and debit records for exchange of predetermined obligations, the method comprising the steps of:

- Creating a shadow credit record and a shadow debit record for each stakeholder party to be held independently by a supervisory institution from the exchange institutions;
- Obtaining from each exchange institution a start-of-day balance for each shadow credit record and shadow debit record;
- For every transaction resulting in an exchange obligation, the supervisory institution adjusting each respective party's shadow credit rating or shadow debit record, allowing only those transactions that do not result in the value of the shadow debit record being less than the value of the shadow credit record at any time, each said adjustment taking place in chronological order; and
- At the end-of-day, the supervisory institution instructing ones of the exchange institutions to exchange credits or debits to the credit record and debit record of the respective parties in accordance with the adjustments of the said permitted transactions, the credits and debits being irrevocable, time invariant obligations placed on the exchange institutions.



***Ultramercial, Inc. v. Hulu, LLC*, 722 F.3d 1335 (Fed. Cir. 2013) (June 21)**

- A method for distributing products over the Internet
 - sending and receiving messages;
 - providing a media product for sale;
 - restricting public access to the media product;
 - allowing a consumer to ask to view and view the media;
 - recording a transaction event;
 - receiving payment

Accenture Global Services, GMBH v. Guidewire Software, Inc., 728 F.3d 1336 (Fed. Cir. 2013) (Sept. 5)

A system for generating tasks to be performed in an insurance organization, the system comprising:

- An insurance transaction database for storing information related to an insurance transaction, the insurance transaction database comprising a claim folder containing the information related to the insurance transaction decomposed into a plurality of levels from the group comprising a policy level, a claim level, a participant level and a line level, wherein the plurality of levels reflects a policy, the information related to the insurance transaction, claimants and an insured person in a structured format;
- A task library database for storing rules for determining tasks to be completed upon an occurrence of an event;
- A client component in communication with the insurance transaction database configured for providing information relating to the insurance transaction, said client component enabling access by an assigned claim handler to a plurality of tasks that achieve an insurance related goal upon completion; and
- A server component in communication with the client component, the transaction database and the task library database, the server component including an event processor, a task engine and a task assistant;
- Wherein the event processor is triggered by application events associated with a change in the information, and sends an event trigger to the task engine; wherein in response to the event trigger, the task engine identifies rules in the task library database associated with the event and applies the information to the identified rules to determine the tasks to be completed, and populates on a task assistant the determined tasks to be completed, wherein the task assistant transmits the determined tasks to the client component.

Ubicomm, LLC v. Zappos IP, Inc., 1:13-cv-01029-RGA (D. Del. Nov. 13, 2013)

A method of triggering a selected machine event in a system including a multiplicity of computer controlled machines and a multiplicity of users, each computer controlled machine being capable of performing a one of the multiplicity of the types of machine events, some of the computer controlled machines being stationary and others of the computer controlled machines being mobile, the method comprising the steps of:

- Selecting a type of machine event to be triggered;
- Selecting triggering properties of said system necessary for triggering said selecting machine event;
- Selecting triggering conditions of an identified user necessary for triggering said selected machine event;
- Perceiving said triggering conditions;
- Determining whether said triggering conditions are met; and
- Triggering said selected machine event when the triggering properties are met and the triggering conditions are perceived.

- An isolated DNA coding for a BRCA1 polypeptide, said polypeptide having the amino acid sequence set forth in SEQ ID NO:2.

- A method for detecting a paternally inherited nucleic acid of fetal origin performed on a maternal serum or plasma sample from a pregnant female, which method comprises amplifying a paternally inherited nucleic acid from the serum or plasma sample and detecting the presence of a paternally inherited nucleic acid of fetal origin in the sample.