

Core Wireless Licensing v. LG Electronics: User Interfaces & Patent-Eligible Subject Matter
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On January 25, 2018 the Federal Circuit released its decision in *Core Wireless Licensing v. LG Electronics*. One of the issues was whether the asserted claims are directed to patent-eligible subject matter under 35 U.S.C. §101 (i.e., under the *Alice/Mayo* framework). The patents describe an improved user interface for devices having small screens, such as mobile telephone devices. In particular, rather than requiring a deeply-layered interface for navigating to device functions, the claims provide an “application summary window,” which may be presented upon interaction with an application from a menu (e.g., highlighting the application for a predetermined time). The application summary window provides quick access to a subset of the application’s functions and/or data prior to actually launching the application. An example claim is:

“A computing device comprising a display screen, the computing device being configured to display on the screen a main menu listing at least a first application, and additionally being configured to display on the screen an application summary window that can be reached directly from the main menu, wherein the application summary window displays a limited list of at least one function offered within the first application, each function in the list being selectable to launch the first application and initiate the selected function, and wherein the application summary window is displayed while the application is in an un-launched state.”

In its decision, the Federal Circuit found the claims to pass Step 1 of the *Alice/Mayo* analysis as not being directed to an abstract idea, since the claims were directed to an improvement in the functioning of computers, particularly those with small screens. To support this finding, the Federal Circuit relied on both the language of the claims and the language of the specification to find that the claims were directed to a particular manner of summarizing and presenting information in electronic devices, which improves the efficiency of using electronic devices.

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