

Recent Developments in Subject Matter Eligibility Guidance and Case Law

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Overview

- USPTO Guidance Updates Since the 2024 AI SME Update (effective July 17, 2024):
 - August 4, 2025 Memo (Reminders)
 - December 4, 2025 Memos (SMEDs & Best Practices for SMEDs)
 - December 5, 2025 Memo (Desjardins)
- CAFC Case Law Updates Since Berkheimer (February 8, 2018):
 - 21 cases finding eligible subject matter
 - 39 cases finding ineligible subject matter



August 4, 2025 Memo (Overview)

- Purports to provide guidance on the following topics that arise when examiners assess Step 2A of the USPTO's subject matter eligibility analysis:
 - (a) reliance on the mental process grouping of abstract ideas;
 - (b) distinguishing claims that recite a judicial exception from claims that merely involve a judicial exception;
 - (c) analysis of the claim as a whole; and
 - (d) consideration of whether a claim is directed to an improvement in the functioning of a computer or "any other technology or technical field."

August 4, 2025 Memo (Step 2A, Prong 1)

- “The mental process grouping is not without limits. Examiners are reminded not to expand this grouping in a manner that encompasses claim limitations that cannot practically be performed in the human mind. The MPEP and the AI-SME Update provide examples of claim limitations that cannot be practically performed in the human mind.⁸ Claim limitations that encompass AI in a way that cannot be practically performed in the human mind do not fall within this grouping.”
- “Examiners should be careful to distinguish claims that recite an exception (which require further eligibility analysis) from claims that merely involve an exception (which are eligible and do not require further eligibility analysis).”

August 4, 2025 Memo (Step 2A, Prong 1) (cont.)

- The claim limitation “training the neural network in a first stage using the first training set” of example 39 does not recite a judicial exception. Even though “training the neural network” involves a broad array of techniques and/or activities that may involve or rely upon mathematical concepts, the limitation does not set forth or describe any mathematical relationships, calculations, formulas, or equations using words or mathematical symbols.
- Contrast this with the limitation “training, by the computer, the ANN based on the input data and a selected training algorithm to generate a trained ANN, wherein the selected training algorithm includes a backpropagation algorithm and a gradient descent algorithm” of claim 2 of example 47. This limitation requires specific mathematical calculations by referring to the mathematical calculations by name, *i.e.*, a backpropagation algorithm and a gradient descent algorithm, and therefore recites a judicial exception, namely an abstract idea.



August 4, 2025 Memo (Step 2A, Prong 2)

- “An important consideration in determining whether a claim improves technology or a technical field is the extent to which the claim covers a particular solution to a problem or a particular way to achieve a desired outcome, as opposed to merely claiming the idea of a solution or outcome.”
- “The examiner is reminded to consult the specification to determine whether the disclosed invention improves technology or a technical field, and evaluate the claim to ensure it reflects the disclosed improvement. The specification does not need to explicitly set forth the improvement, but it must describe the invention such that the improvement would be apparent to one of ordinary skill in the art. The claim itself does not need to explicitly recite the improvement described in the specification.”

August 4, 2025 Memo (Step 2A, Prong 2) (cont.)

- Examiners are cautioned not to oversimplify claim limitations and expand the application of the “apply it” consideration. Moreover, examiners are reminded that the “apply it” consideration often overlaps with the improvements consideration. When evaluating these two considerations, examiners may consider the following:
 1. Whether the claim recites only the idea of a solution or outcome, *i.e.*, the claim fails to recite details of how a solution to a problem is accomplished, or the claim covers a particular solution to a problem or a particular way to achieve a desired outcome.
 2. Whether the claim invokes computers or other machinery merely as a tool to perform an existing process, or whether the claim purports to improve computer capabilities or to improve an existing technology.
 3. The particularity or generality of the application of the judicial exception.

August 4, 2025 Memo (What if it's a Close Call?)

- Examiners are reminded that if it is a “close call” as to whether a claim is eligible, they should only make a rejection when it is more likely than not (*i.e.*, more than 50%) that the claim is ineligible under 35 U.S.C. 101.²⁰ A rejection of a claim should not be made simply because an examiner is uncertain as to the claim’s eligibility. In order to make a rejection of a claim under any of the statutory bases (*i.e.*, 35 U.S.C. 101, 102, 103, 112), unpatentability must be established by a preponderance of the evidence.



December 4, 2025 Memo (SMEDS)

- “This memo is being issued to raise examiner awareness about the existing option for applicants to submit a declaration under 37 CFR 1.132, an underutilized path to proffer evidence to establish subject matter eligibility of the claimed invention. The submission of such an evidentiary declaration may be helpful in demonstrating patent eligibility that may not be readily apparent. While the submission of a SMED is entirely optional for applicants, it can be used to clarify the record and lead to stronger issued patents.”



December 4, 2025 Memo (SMEDS)

- Any person who has knowledge of the facts being asserted in the declaration may sign the declaration (e.g., an inventor, an inventor's co-worker, an independent expert, or others).
- No special qualification other than knowledge of the facts is required.



December 4, 2025 Memo (SMEDS)

- For an evidentiary declaration to be relevant, there must be a nexus between the invention as claimed and the evidence provided in the declaration.
- For example, a SMED may demonstrate how one of ordinary skill in the art would interpret a specification that describes a technological improvement to show that the claimed invention is patent-eligible subject matter.
- To be of probative value, any objective evidence should be supported by actual proof.



December 4, 2025 Memo (SMEDS)

- The specification need not explicitly set forth the improvement, so long as the specification describes the invention such that the improvement would be apparent to one of ordinary skill in the art.
- In such a situation, a SMED may provide facts that describe the state of the art at the time of filing, provide objective evidence as to how the invention improved upon the state of the art, or provide a factual basis for determining that one of ordinary skill in the art would have concluded that the invention improved the underlying technology.



December 4, 2025 Memo (SMEDS)

- The examiner must carefully consider all of the applicant's arguments and the evidence rebutting the subject matter eligibility rejection when evaluating the applicant's response.
- The evidence provided in the declaration must be taken into account whenever properly presented; however, such evidence alone would not necessarily control the eligibility determination because the examiner must weigh all relevant evidence of record and then determine whether the claims are eligible based on the preponderance of the evidence (i.e., more likely than not) standard.



December 4, 2025 Memo (Best Practices)

- Subject matter eligibility declarations (SMEDs) should be submitted as separate documents and not combined with declarations or testimony addressing other issues, such as obviousness (e.g., secondary considerations or motivation to combine).



December 4, 2025 Memo (Best Practices)

- This approach (of submitted SMEDs as separate documents):
 - Ensures clarity and relevance of the evidentiary record.
 - Facilitates examiner review and decision-making.
 - Enhances the clarity and may bolster probative value of the SMED.
 - Reduces risk of procedural or substantive confusion.



December 5, 2025 Memo (Overview)

- Gives advance notice of revisions to the MPEP in view of the Appeals Review Panel decision in *Ex Parte Desjardins*, Appeal No. 2024-000567 (PTAB September 26, 2025, Appeals Review Panel Decision) vacating the Board's new ground of rejection under 35 U.S.C. § 101.
- *Ex Parte Desjardins* explained the following:
 - *Enfish* ranks among the Federal Circuit's leading cases on the eligibility of technological improvements. In particular, *Enfish* recognized that “[m]uch of the advancement made in computer technology consists of improvements to software that, by their very nature, may not be defined by particular physical features but rather by logical structures and processes.” 822 F.3d at 1339. Moreover, because “[s]oftware can make non-abstract improvements to computer technology, just as hardware improvements can,” the Federal Circuit held that the eligibility determinations should turn on whether “the claims are directed to an improvement to computer functionality versus being directed to an abstract idea.” *Id.* at 1336. (*Desjardins*, page 8).



December 5, 2025 Memo (2106.04(d))

- The following paragraph is added to the end of MPEP § 2106.04(d), subsection III:
 - In Ex Parte Desjardins, Appeal No. 2024-000567 (PTAB September 26, 2025, Appeals Review Panel Decision) (precedential), the claimed invention was a **method of training a machine learning model on a series of tasks**. The Appeals Review Panel (ARP) overall credited benefits including reduced storage, reduced system complexity and streamlining, and preservation of performance attributes associated with earlier tasks during subsequent computational tasks as technological improvements that were disclosed in the patent application specification. Specifically, the ARP upheld the Step 2A Prong One finding that the claims recited an abstract idea (i.e., mathematical concept). In Step 2A Prong Two, the ARP then determined **that the specification identified improvements as to how the machine learning model itself operates, including training a machine learning model to learn new tasks while protecting knowledge about previous tasks to overcome the problem of “catastrophic forgetting” encountered in continual learning systems**. Importantly, the ARP evaluated the claims as a whole in discerning at least the limitation “**adjust the first values of the plurality of parameters to optimize performance of the machine learning model on the second machine learning task while protecting performance of the machine learning model on the first machine learning task**” reflected the improvement disclosed in the specification. Accordingly, the claims as a whole integrated what would otherwise be a judicial exception instead into a practical application at Step 2A Prong Two, and therefore the claims were deemed to be outside any specific, enumerated judicial exception (Step 2A: NO).

December 5, 2025 Memo (2106.04(d)) (cont.)

- The second and last paragraphs of MPEP § 2106.04(d)(1) are revised to read:
 - The claim itself does not need to explicitly recite the improvement described in the specification (e.g., “thereby increasing the bandwidth of the channel”). See, e.g., *Ex Parte Desjardins*, Appeal No. 2024-000567 (PTAB September 26, 2025, Appeals Review Panel Decision) (precedential), in which the specification identified the improvement to machine learning technology by explaining how the machine learning model is trained to learn new tasks while protecting knowledge about previous tasks to overcome the problem of “catastrophic forgetting,” and that the claims reflected the improvement identified in the specification. Indeed, enumerated improvements identified in the *Desjardins* specification included disclosures of the effective learning of new tasks in succession in connection with specifically protecting knowledge concerning previously accomplished tasks; allowing the system to reduce use of storage capacity; and the enablement of reduced complexity in the system. Such improvements were tantamount to how the machine learning model itself would function in operation and therefore not subsumed in the identified mathematical calculation.

December 5, 2025 Memo (2106.04(d)) (cont.)

- Examples of claims that improve technology or a technical field and are not directed to a judicial exception include: . . . Ex Parte Desjardins (claims to a method of training a machine learning model were directed to improvements in the machine learning technology itself and additionally included data structure elements reciting adjustments in values to plurality of performance parameters while preserving prior values).



December 5, 2025 Memo (2106.05(a))

- The fourth and fifth paragraphs of MPEP § 2106.05(a) are revised to read:
 - When performing this evaluation, examiners should be “careful to avoid oversimplifying the claims” by looking at them generally and failing to account for the specific requirements of the claims. *McRO*, 837 F.3d at 1313, 120 USPQ2d at 1100. See also *Ex Parte Desjardins*, Appeal No. 2024-000567 (PTAB September 26, 2025, Appeals Review Panel Decision) (precedential) (“Examiners and panels should not evaluate claims at such a high level of generality” that potentially meaningful technical limitations are dismissed without adequate explanation).
 - When evaluating a claim as a whole, examiners should not dismiss additional elements as mere “generic computer components” without considering whether such elements confer a technological improvement to a technical problem, especially as to improvements to computer components or the computer system. See, e.g., *Ex Parte Desjardins*, Appeal No. 2024-000567 (PTAB September 26, 2025) (Appeals Review Panel Decision).

December 5, 2025 Memo (2106.05(a)) (cont.)

- The second paragraph of MPEP § 2106.05(a), subsection I, is revised to add new examples xiii and xiv to the list of examples that may show an improvement in computer functionality:
 - xiii. An improved way of training a machine learning model that protected the model's knowledge about previous tasks while allowing it to effectively learn new tasks; *Ex Parte Desjardins*, Appeal No. 2024-000567 (PTAB September 26, 2025, Appeals Review Panel Decision) (precedential); and
 - xiv. Improvements to computer component or system performance based upon adjustments to parameters of a machine learning model associated with tasks or workstreams; *Ex Parte Desjardins*, Appeal No. 2024-000567 (PTAB September 26, 2025, Appeals Review Panel Decision) (precedential).

December 5, 2025 Memo (2106.05(f))

- The ninth paragraph of MPEP § 2106.05(f) is revised to read:
 - Finally, in *Ex Parte Desjardins*, the claims reflected a specific improvement that addressed the technical problem of “catastrophic forgetting” in continual learning systems, while allowing artificial intelligence systems to variously optimize system performance, use less storage capacity and reduce system complexity. *Ex Parte Desjardins*, Appeal No. 2024-000567 (PTAB September 26, 2025, Appeals Review Panel Decision) (precedential).



CAFC Case Law Updates Since Berkheimer (2018)

- 39 cases finding ineligibility
- 21 cases finding eligibility, but only 16 pertaining to software:
 - 11 – Not abstract (Step 1)
 - 5 – Not natural phenomenon (Step 1)
 - 5 – Inventive concept found (Step 2)

CAFC Case Law Updates Since Berkheimer (Eligible)

<u>Aatrix Software v. Green Shades Software</u> , 882 F. 3d 1121 (Fed. Cir. 2018)	2018-02-14	Eligible	Abstract	IC Found	Importing data into forms
<u>Data Engine Technologies LLC v. Google LLC</u> , 906 F.3d 999 (Fed. Cir. 2018)	2018-10-09	Eligible	Not Abstract	IC Not evaluated	Tab interface for 3-D spreadsheets
<u>Ancora Technologies, Inc. v. HTC America, Inc.</u> , 908 F.3d 1343 (2018)	2018-11-16	Eligible	Not Abstract	IC Not evaluated	Software license control using BIOS

<u>SRI International, Inc. v. Cisco Systems, Inc.</u> ,	2019-03-20	Eligible	Not Abstract	IC Not evaluated	Evaluating network data to find suspicious activity
<u>Cellspin Soft, Inc. v. Fitbit, Inc.</u> , 927 F.3d 1306 (Fed. Cir. 2019)	2019-06-25	Eligible	Abstract	IC Found	Data transfer between devices
<u>Koninklijke KPN NV v. Gemalto M2M GmbH</u> , 942 F.3d 1143 (Fed. Cir. 2019)	2019-11-15	Eligible	Not Abstract	IC Not evaluated	Error Checking in Data
<u>CardioNet, LLC v. InfoBionic, Inc.</u> , Fed. Cir. 2020	2020-04-17	Eligible	Not Abstract	IC Not evaluated	Cardiac monitoring device
<u>Uniloc USA, Inc. v. LG Electronics USA, Inc.</u> ,	2020-04-30	Eligible	Not Abstract	IC Not evaluated	Communication station



<u>Packet Intelligence LLC v. NetScout Systems, Inc.</u> , 965 F.3d 1299 (Fed. Cir. 2020)	2020-07-14	Eligible	Not Abstract	IC Not evaluated	Identify disjointed network connection flow
<u>XY, LLC v. Trans Ova Genetics, LC</u> , 968 F.3d 1323 (Fed. Cir. 2020)	2020-07-31	Eligible	Not Abstract	IC Not evaluated	Improved lab technique for sorting particles
<u>TecSEC, Inc. v. Adobe Inc.</u> , 978 F.3d 1278 (Fed. Cir. 2020)	2020-10-23	Eligible	Not Abstract	IC Not evaluated	Encryption method that improve network security
<u>CosmoKey Solutions GmbH & Co. KG v. Duo Security LLC</u> , 15 F.4th 1091 (Fed. Cir. 2021)	2021-10-04	Eligible	Abstract	IC Found	Authenticating users at a terminal



<u>Cooperative Entertainment, Inc. v. Kollektive Technology, Inc.</u> ,	2022-09-28	Eligible	Abstract	IC Found	Peer-to-peer file sharing
<u>Weisner v. Google LLC</u> , (No. 2021-2228, October 13, 2022)	2022-10-13	Eligible	Abstract	IC Found	Recording physical movements and using data for electronic searches
<u>ADASA Inc. v. Avery Dennison Corporation</u> , 55 F.4th 900 (Fed. Cir. 2022)	2022-12-16	Eligible	Not Abstract	IC Not evaluated	Encoding serial number in RFID Chip
<u>Contour IP Holding LLC v. GoPro, Inc.</u> , 113 F.4th 1373 (Fed. Cir. 2024)	2024-09-09	Eligible	Not Abstract	IC Not evaluated	Cameras that streamed low quality image stream for live camera control



<u>US Synthetic Corp. v. International Trade Commission,</u>	2025-02-13	Eligible	Not Abstract	IC Not evaluated	Polycrystalline diamond compacts (PDCs) claimed with limitations relating to magnetic properties
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Appeal Review Panel (ARP) Rulings Since Berkheimer (Eligible)

<u>Ex Parte Desjardins,</u> Appeal Review Board, Appel 2024-000567, Sept. 26, 2025	2025-09-26	Eligible	Not Abstract	IC Not evaluated	A method for training a machine learning model
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CAFC Case Law Updates Since Berkheimer (2018)

- What do the cases found to be non-abstract have in common?
 - they each specify a particular mechanism, structure, or technique (rather than a desired outcome);
 - they each operate on or within the technology itself (rather than using technology as a tool for a non-technological task);
 - they each respond to a limitation that is specific to the technology; and
 - none of them are primarily characterized as collecting, analyzing, and displaying data.



CAFC Case Law Updates Since Berkheimer (2018)

- What do the cases found to have an inventive concept have in common?
 - the inventive concept resided in a non-conventional arrangement or combination of known elements rather than in a single novel component;
 - the claimed combination provided a technical benefit distinguishable from the abstract idea;
 - the inventive concept was tied to specific claim limitations rather than unclaimed specification disclosures; and
 - the cases frequently arose at the Rule 12 stage where factual questions about conventionality remained open.



Ancora Technologies v. HTC

1. A method of restricting software operation within a license for use with a computer including an erasable, non-volatile memory area of a BIOS of the computer, and a volatile memory area; the method comprising the steps of:

selecting a program residing in the volatile memory,

using an agent to set up a verification structure in the erasable, non-volatile memory of the BIOS, the verification structure accommodating data that includes at least one license record,

verifying the program using at least the verification structure from the erasable non-volatile memory of the BIOS, and

acting on the program according to the verification.



Ancora Technologies v. HTC

- **At step one**, the court found that the claims were not directed to an abstract idea.
- The invention related to operating software within the limits of a software license. The court reviewed other software cases that found claims to be patent eligible, and determined that the claims in Ancora "focused on a solution to a computer-functionality problem, and included sufficient specificity to be patent-eligible under step one of Alice."
- The court found it important that the proposed technique "depart[ed] from earlier approaches," implying that it might be appropriate to consider the prior art under step one.
- Because the claims were found patent-eligible under step one (not directed to an abstract idea), the court did not evaluate **step two** regarding whether the claims included an inventive concept.
- The Ancora decision represents one of the few CAFC findings that a software patent was eligible based on providing a specific technical solution to a computer-functionality problem, similar to cases like Enfish and McRO.



Universal Secure Registry v. Apple / Visa

- **At step one**, the court reduced the claimed invention to its conceptual core — using a one-time code instead of a persistent identifier for a transaction. The court treated this as a known, abstract concept.
- The patent owner's counterargument — that the time-varying multicharacter code was a specific technique — failed because the court viewed the specificity of the code generation as insufficient to move the claim away from the abstract idea. The court appears to have treated the time-varying code as a feature of the abstract idea itself rather than as a specific technical implementation that would make the claim non-abstract.



Universal Secure Registry v. Apple / Visa

22. A method for providing information to a provider to enable transactions between the provider and entities who have secure data stored in a secure registry in which each entity is identified by a time-varying multicharacter code, the method comprising:

receiving a transaction request including at least the time-varying multicharacter code for an entity on whose behalf a transaction is to take place and an indication of the provider requesting the transaction;

mapping the time-varying multicharacter code to an identity of the entity using the time-varying multicharacter code;

determining compliance with any access restrictions for the provider to secure data of the entity for completing the transaction based at least in part on the indication of the provider and the time-varying multicharacter code of the transaction request;

accessing information of the entity required to perform the transaction based on the determined compliance with any access restrictions for the provider, the information including account identifying information;

providing the account identifying information to a third party without providing the account identifying information to the provider to enable or deny the transaction;
and

enabling or denying the provider to perform the transaction without the provider's knowledge of the account identifying information.



Universal Secure Registry v. Apple / Visa

- **At step two**, the court applied two separate lines of reasoning to reject the inventive concept:
 - First, the known nature of the time-varying code generator meant it could not be unconventional. This follows the standard Berkheimer framework — if the element is conventional, it cannot supply the inventive concept.
 - Second, the court drew a direct analogy to Alice itself. The intermediary that reviews the code was compared to the intermediary in Alice that facilitated settlement between parties.
 - Because the Supreme Court found the Alice intermediary to be part of the abstract idea (and therefore incapable of serving as an inventive concept), the same logic applied here. The intermediary reviewing the one-time code was performing the same type of function — mediating a transaction — and therefore could not rescue the claim.



CosmoKey Solutions v. Duo Security

1. A method of authenticating a user to a transaction at a terminal, comprising the steps of:

transmitting a user identification from the terminal to a transaction partner via a first communication channel,

providing an authentication step in which an authentication device uses a second communication channel for checking an authentication function that is implemented in a mobile device of the user,

as a criterion for deciding whether the authentication to the transaction shall be granted or denied, having the authentication device check whether a predetermined time relation exists between the transmission of the user identification and a response from the second communication channel,

ensuring that the authentication function is normally inactive and is activated by the user only preliminarily for the transaction,

ensuring that said response from the second communication channel includes information that the authentication function is active, and

thereafter ensuring that the authentication function is automatically deactivated.



CosmoKey Solutions v. Duo Security

- **At step one**, the court did not specifically determine whether the claim was directed to an abstract idea. The court determined that the abstract idea determination under step one was irrelevant because the claim was eligible under step two as it included an inventive concept.
- In a concurrence, Judge Reyna stated he would find the claim eligible under step one (not directed to an abstract idea), and criticized the majority for skipping step one as inappropriate.



CosmoKey Solutions v. Duo Security

- **At step two**, the court found that claims relating to a new authentication technique included a patent eligible inventive concept that reduced the complexity of authenticating a user.
- The court distinguished Universal Secure Registry, noting that Universal Secure Registry related to combining "conventional authentication techniques" to achieve only the expected result of such a combination. In contrast, the court found the CosmoKey case more similar to Ancora Technology, where verification methods that departed from earlier approaches were directed to a "non-abstract, computer-functionality improvement."



Decision on Request for Rehearing (12/856,026)

24. A method comprising:

performing operations, within a computer-implemented authentication architecture, to authenticate an identity of a user before allowing or denying a request from the user to authorize a credit transaction associated with a credit account associated with the user to be completed, the operations comprising:

establishing an authentication account for the user associated with the credit account;

receiving authentication information from the user associated with the credit account;

receiving a set of renewal rules, the set of renewal rules specifying, for the credit account, one or more conditions under which the user associated with the credit account is to provide renewed authentication information, the one or more conditions comprising a monetary limit, a geographical area, or a timeframe for credit transactions associated with the credit account;

storing the one or more conditions in one or more profiles associated with the credit account;

in response to receiving the request from the user to authorize the credit transaction associated with the credit account and in response to determining that the user authentication information received from the user has been invalidated, the determining that the user authentication information received from the user has been invalidated based on an accessing of the one or more conditions stored in the one or more profiles associated with the credit account, requesting that the user provide biometric data via one or more biometric input devices provided to the user and, in response to determining that the biometric data corresponds to the user authentication information previously received from the user, generating the renewed user authentication information, updating the one or more profiles with the renewed authentication information, and allowing the request, or, in response to determining that the biometric data does not correspond to the user authentication information previously received from the user, denying the request.

Decision on Request for Rehearing (12/856,026)

- **At step one**, the Board held that claim 24 was "directed to a method of authentication of a user for a credit applicant in a credit transaction in which they may be authenticated using a set of rules and conditions, and if the request is not validated requesting biometric information to be verified to authorize the request, which is one of certain methods of organizing human activity in the form of a fundamental economic practice."
- In particular, the Board found this constituted an abstract concept relating to commercial interactions and managing interactions between people, which are judicial exceptions.



Decision on Request for Rehearing (12/856,026)

- **At step two**, the Board found the claims did not integrate the judicial exception into a practical application because the claims did not improve computer functionality, improve another field of technology, utilize a particular machine, or effect a particular physical transformation. The additional computer elements (like "computer-implemented authentication architecture") were described as generic computer components performing conventional functions like "authenticating," "authorizing," "establishing," "receiving," "storing," etc.
- On rehearing, the Board distinguished the claims from CosmoKey, noting that unlike CosmoKey's specific authentication improvements, the claims here were "to combine known methods of authentication, including rules verification and biometrics" and remained an abstract concept. The Board also referenced Universal Secure Registry, where claims combining "multiple conventional authentication techniques" including "biometric authentication" were held abstract.



Thank you



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