

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

Ikorongo Texas LLC v. Samsung Electronics Co Ltd., et al.

Ikorongo Texas · No. 21-cv-07424-VC; 21-cv-07429-VC · Decided June 25, 2025

SUMMARY

The United States District Court for the Northern District of California granted defendants' motions to dismiss in related patent infringement actions brought by Ikorongo Texas LLC. The court held that the claims of the '450 Patent lacked clear and unequivocal support in the '139 Patent's original disclosure and dismissed the lawsuits without leave to amend because amendment would be futile.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Vince Chhabria
JURISDICTION	United States District Court for the Northern District of California
DECIDED	June 25, 2025
DOCKET	21-cv-07424-VC; 21-cv-07429-VC
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendants moved to dismiss two patent lawsuits under Federal Rule of Civil Procedure 12(b)(6), and the district court granted the motions.
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	Ikorongo Texas LLC, et al. v. Samsung Electronics Co Ltd, et al., LG Electronics Inc., et al.

TOPICS

- patent law
- patent infringement
- motions to dismiss
- pleadings
- civil procedure

PRACTICE AREAS

- patent law
- patent infringement
- civil procedure

QUESTIONS PRESENTED

- Whether the '450 Patent's asserted claims complied with the original patent requirement based on disclosure in the '139 Patent.

2. Whether the actions should be dismissed without leave to amend because any amendment would be futile.

HOLDINGS

1. The '450 Patent's claims at issue failed to comply with the original patent requirement because the '139 Patent did not clearly and unequivocally disclose sharing geographic data separate and apart from sharing a user's experience with a particular location.
2. Dismissal without leave to amend was warranted because any amendment would be futile.

KEY QUOTATIONS

“The defendants’ motions to dismiss are granted.”

“Because any amendment would be futile, Ikorongo’s lawsuits are dismissed without leave to amend.”

FACTUAL BACKGROUND

The '139 Patent concerns sharing user experience information and discusses, among other things, tracking mobile-device locations and sharing a visit to a specific location. The asserted claims of the '450 Patent addressed sharing geographic data separately from sharing a user's experience with a location, including continuous geographic data regardless of whether the user meaningfully interacted with the location. The court found that the '139 Patent did not clearly and unequivocally disclose the subject matter claimed in the '450 Patent.

PROCEDURAL HISTORY

Ikorongo Texas LLC brought separate patent infringement actions against Samsung Electronics Co. Ltd. and LG Electronics Inc. The defendants moved to dismiss. The district court concluded that the claims of the '450 Patent failed to comply with the original patent requirement and dismissed both lawsuits without leave to amend because amendment would be futile.

DISPOSITION

dismissed

CASES CITED

- Ikorongo Technology LLC v. Bumble Trading LLC, 598 F. Supp. 3d 500, 509 (W.D. Tex. 2022)
- Ikorongo Texas LLC v. Bumble Trading LLC, No. 2022-2044, 2023 WL 5814409 (Fed. Cir. Sept. 8, 2023)

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