

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PRECEDENTIAL VALUE	unpublished district court order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)

OPINION

Ikorongo Texas LLC v. Samsung Electronics Co., LTD

PER CURIAM.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

IKORONGO TEXAS LLC, et al., Case No. 21-cv-07424-VC Plaintiffs,
v. ORDER GRANTING MOTIONS TO
DISMISS

SAMSUNG ELECTRONICS CO LTD, et Re: Dkt. No. 139 al., Defendants. IKORONGO TEXAS LLC, et al., Case No. 21-cv-07429-VC Plaintiffs, Re: Dkt. No. 147 v. LG ELECTRONICS INC, et al., Defendants. The defendants' motions to dismiss are granted. This order assumes the reader's familiarity with the facts, relevant legal standards, and arguments made by the parties. While this is a close question, the '450 Patent's claims at issue in this case fail to comply with the original patent requirement. The '139 Patent is directed towards sharing user experience information. While a user experience can encompass sharing that a user visited a certain location, the '139 Patent distinguishes between raw location data and user experiences, the latter of which are the primary focus of the Patent's sharing technology. See '139 Patent at 18:58–59 (“In addition to computer user experiences, mobile communication device locations can be tracked . . .”). The '139 Patent's oblique reference to tracking location and disclosure of aspects relating to sharing a visit to a specific location do not provide “clear and unequivocal disclosure” for the '450 Patent's claims related to the sharing of geographic data separate and apart from sharing the user's experience with a certain location. See *Ikorongo Technology LLC vy. Bumble Trading LLC*, 598 F. Supp. 3d 500, 509 (W.D. Tex. 2022), *aff'd sub nom. Ikorongo Texas LLC v. Bumble Trading LLC*, No. 2022-2044, 2023 WL 5814409 (Fed. Cir. Sept. 8, 2023). So there is a disconnect between the scope of the '139 Patent, which discusses sharing that a user visited a location as part of sharing a user experience, and the claims of the '450 Patent, which contemplates sharing continuous geographic data, regardless of whether the user actually interacted with that location in any meaningful way. See *id.* (“Thus, any disclosure of sharing a ‘location’ or ‘visit’ may refer to sharing the name of the location or logo and fails to serve as a clear and unequivocal reference to ‘geographic’ location data.”). Because any amendment would be futile, Ikorongo's lawsuits are dismissed without leave to amend. IT IS SO ORDERED. Dated: June 25, 2025 =

VINCE CHHABRIA

United States District Judge