

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

ZoomInfo Technologies LLC v. Zenleads Inc., d/b/a Apollo.IO

ZoomInfo v. Zenleads · No. 1:25-cv-00324-JCG · Decided June 23, 2026

SUMMARY

The United States District Court for the District of Delaware construes disputed terms in U.S. Patent Nos. 10,380,609 and 11,392,964 in ZoomInfo Technologies LLC’s patent infringement action against Zenleads Inc., doing business as Apollo.io. The court construes “feature matrix” as a tabular data structure with rows corresponding to entities and columns corresponding to features. The court holds that “fitness . . . characteristics” and “the target client” are not indefinite and gives both terms their plain and ordinary meaning.

CASE DETAILS

COURT	United States District Court for the District of Delaware
WRITING FOR THE COURT	Jennifer Choe-Groves
JURISDICTION	United States District Court for the District of Delaware
DECIDED	June 23, 2026
DOCKET	1:25-cv-00324-JCG
DISPOSITION	other
PROCEDURAL POSTURE	Claim construction proceeding in a patent infringement action concerning terms in U.S. Patent Nos. 10,380,609 and 11,392,964.
STANDARD OF REVIEW	Claim construction is a question of law for the court. Indefiniteness must be proven by clear and convincing evidence and is evaluated under the reasonable-certainty standard, considering the claims, specification, and prosecution history.
PRECEDENTIAL VALUE	unknown
PARTIES	ZoomInfo Technologies LLC v. Zenleads Inc., d/b/a Apollo.IO

TOPICS

- patent law
- patent infringement
- intellectual property
- commercial litigation

PRACTICE AREAS

- patent law
- patent infringement
- claim construction
- patent indefiniteness

QUESTIONS PRESENTED

1. What is the proper construction of the claim term “feature matrix”?
2. Whether “fitness . . . characteristics” is indefinite under 35 U.S.C. § 112(b).
3. Whether “the target client” is indefinite under 35 U.S.C. § 112(b) because it follows the claim's reference to a plurality of target clients.

HOLDINGS

1. “Feature matrix” means “a tabular data structure, where each row corresponds to an entity, and each column corresponds to a feature, with row-column intersections containing the value of the corresponding feature for the respective entity.”
2. “Fitness . . . characteristics” is not indefinite and has its plain and ordinary meaning.
3. “The target client” is not indefinite and has its plain and ordinary meaning; it refers to a target client from the previously recited plurality of target clients.

KEY QUOTATIONS

“The Court concludes that the claim term “feature matrix” means “a tabular data structure, where each row corresponds to an entity, and each column corresponds to a feature, with row-column intersections containing the value of the corresponding feature for the respective entity.”” (Conclusion)

“Accordingly, the term “the target client” is not indefinite and the Court adopts the plain and ordinary meaning for the term “the target client.”” (Conclusion)

FACTUAL BACKGROUND

ZoomInfo asserted the '609 and '964 patents against Zenleads in a patent infringement action. The patents share a common specification, claim priority to the same provisional application, and concern automated predictive analytics for generating sales leads and engagement recommendations. The claim construction dispute concerned the meanings of “feature matrix,” “fitness . . . characteristics,” and “the target client,” including whether the latter two terms were indefinite.

PROCEDURAL HISTORY

ZoomInfo sued Zenleads for infringement of the asserted patents. The parties submitted joint claim construction charts and briefs, and the court held a claim construction hearing on May 7, 2026, without expert testimony. The court construed three disputed terms and adopted the parties' agreed constructions for three additional terms.

DISPOSITION

other

CASES CITED

- Markman v. Westview Instruments, Inc., 52 F.3d 967, 979 (Fed. Cir. 1995) (en banc), aff'd, 517 U.S. 370 (1996)
- O2 Micro International Ltd. v. Beyond Innovation Technology Co., 521 F.3d 1351, 1360 (Fed. Cir. 2008)
- Vitronics Corp. v. Conceptronic, Inc., 90 F.3d 1576, 1582 (Fed. Cir. 1996)
- Thorner v. Sony Computer Entertainment America LLC, 669 F.3d 1362, 1365 (Fed. Cir. 2012)
- Phillips v. AWH Corp., 415 F.3d 1303, 1313, 1323–24 (Fed. Cir. 2005) (en banc)
- GE Lighting Solutions, LLC v. AgiLight, Inc., 750 F.3d 1304, 1309–10 (Fed. Cir. 2014)
- Budde v. Harley-Davidson, Inc., 250 F.3d 1369, 1379–80 (Fed. Cir. 2001)
- Multiform Desiccants, Inc. v. Medzam, Ltd., 133 F.3d 1473, 1478 (Fed. Cir. 1998)
- Constant v. Advanced Micro-Devices, Inc., 848 F.2d 1560, 1571 (Fed. Cir. 1988)
- Microsoft Corp. v. I4I Ltd. Partnership, 564 U.S. 91, 95 (2011)
- Nautilus, Inc. v. Biosig Instruments, Inc., 572 U.S. 898, 901 (2014)
- BASF Corp. v. Johnson Matthey Inc., 875 F.3d 1360, 1366 (Fed. Cir. 2017)
- Interval Licensing LLC v. AOL, Inc., 766 F.3d 1364, 1371 (Fed. Cir. 2014)
- Energizer Holdings, Inc. v. International Trade Commission, 435 F.3d 1366, 1370 (Fed. Cir. 2006)
- Union Pacific Resources Co. v. Chesapeake Energy Corp., 236 F.3d 684, 692 (Fed. Cir. 2001)
- Collabo Innovations, Inc. v. OmniVision Technologies, Inc., No. CV 16-197-JFB-SRF, 2017 WL 3670661, at *10 (D. Del. Aug. 25, 2017)

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