UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

OnePass Data Technology LLC v. AT&T Mobility LLC and AT&T Services, Inc.

OnePass · No. 1:25-cv-01111-JCG · Decided May 26, 2026

SUMMARY

The United States District Court for the District of Delaware denied Defendants' motion to dismiss a patent-infringement complaint brought by OnePass Data Technology LLC against AT&T Mobility LLC and AT&T Services, Inc. The court analyzed whether claims concerning computer-implemented data cleansing and single-pass processing recited patent-eligible subject matter under 35 U.S.C. § 101 and whether the complaint plausibly stated a claim for relief.

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	May 26, 2026
DOCKET	1:25-cv-01111-JCG
DISPOSITION	denied
PROCEDURAL POSTURE	Plaintiff brought a patent-infringement action, and defendants moved under Federal Rule of Civil Procedure 12(b)(6) to dismiss on the grounds that the asserted patents claimed patent-ineligible subject matter under 35 U.S.C. § 101 and that the complaint failed to state a plausible claim for relief.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts well-pleaded factual allegations as true and determines whether the complaint states a facially plausible claim for relief. Patent eligibility under § 101 is a question of law with underlying factual questions; at the pleading stage, plausibly alleged factual disputes concerning whether claim elements are well-understood, routine, and conventional must be resolved in favor of the patentee.
PRECEDENTIAL VALUE	unpublished district-court opinion; precedential status not stated in the source

TOPICS

patent eligibility | motions to dismiss | patent infringement | pleadings | civil procedure

PRACTICE AREAS

patent law | patent eligibility | civil procedure | commercial litigation

QUESTIONS PRESENTED

1. Whether Claim 1 of the '680 Patent could be treated as representative of the challenged claims for purposes of the § 101 eligibility analysis.
2. Whether the asserted patent claims were directed to an abstract idea under step one of the Alice framework.
3. Whether the complaint plausibly alleged an inventive concept under step two of the Alice framework at the pleading stage.
4. Whether the complaint pleaded sufficient factual allegations to provide fair notice of the alleged direct infringement and state a plausible claim under Rule 12(b)(6).

HOLDINGS

1. Claim 1 of the '680 Patent may be treated as representative of the other challenged patent claims because the claims are substantially similar and linked to the same allegedly abstract concept, and the plaintiff failed to present a non-frivolous argument requiring separate eligibility analyses.
2. The representative Claim 1 of the '680 Patent is directed to the abstract idea of reading and searching multiple data files to create a new data file in one cycle.
3. The complaint plausibly alleged an inventive concept sufficient to survive a Rule 12(b)(6) motion at Alice step two.
4. The complaint plausibly alleged direct infringement and provided defendants fair notice of the alleged infringing conduct.

KEY QUOTATIONS

> *"The Court concludes that Claim 1 of the '680 Patent is directed to the abstract idea of reading and searching multiple data files to create a new data file in one cycle."* (Discussion § II.A)

> *"Considering all plausible factual allegations in the Complaint as true, and drawing all reasonable inferences in favor of Plaintiff as the non-movant, the Court concludes that Plaintiff has sufficiently pled facts alleging an inventive concept that transforms the representative claim into a patent-eligible application of the abstract idea."* (Discussion § II.B)

> *"The Court concludes that Plaintiff has plausibly alleged sufficient factual allegations to put Defendants on notice of their alleged infringing behavior."* (Discussion § III)

FACTUAL BACKGROUND

OnePass alleged that it owned the asserted patents, which concern computer-implemented techniques for cleansing, linking, and appending database records. The patents describe processing input and reference files in a single pass so that records are read and written only once, allegedly improving the efficiency, reliability, and performance of data-cleansing systems. OnePass alleged that AT&T used USPS CASS-certified software and related systems to standardize, correct, and verify mailing-list address records, thereby practicing the asserted method and system claims.

PROCEDURAL HISTORY

OnePass sued AT&T Mobility LLC for infringement of U.S. Patent Nos. 7,376,680 and 8,682,866. AT&T Services, Inc. was added as a defendant by stipulation and court order, with the substitution relating back to the allegations in the complaint. After briefing and oral argument, the court denied defendants' motion to dismiss and ordered the parties to submit a proposed scheduling order.

DISPOSITION

denied

CASES CITED

- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 555–56, 570 (2007)
- Aatrix Software, Inc. v. Green Shades Software, Inc., 882 F.3d 1121, 1125, 1127–28 (Fed. Cir. 2018)
- Berkheimer v. HP Inc., 881 F.3d 1360, 1364–65, 1368 (Fed. Cir. 2018)
- SAP Am., Inc. v. InvestPic, LLC, 898 F.3d 1161, 1166–67 (Fed. Cir. 2018)
- Two-Way Media Ltd. v. Comcast Cable Commc'ns, LLC, 874 F.3d 1329, 1341 (Fed. Cir. 2017)
- RecogniCorp, LLC v. Nintendo Co., 855 F.3d 1322, 1328 (Fed. Cir. 2017)
- FairWarning IP, LLC v. Iatric Sys., Inc., 839 F.3d 1089, 1098 (Fed. Cir. 2016)
- Genetic Techs. Ltd. v. Merial L.L.C., 818 F.3d 1369, 1380 (Fed. Cir. 2016)
- Alice Corp. Pty. Ltd. v. CLS Bank Int'l, 573 U.S. 208, 216–18, 221, 225 (2014)
- Mayo Collaborative Servs. v. Prometheus Labs., Inc., 566 U.S. 66, 71–73 (2012)
- Simio, LLC v. FlexSim Software Prods., Inc., 983 F.3d 1353, 1358–59 (Fed. Cir. 2020)
- Finjan, Inc. v. Blue Coat Sys., Inc., 879 F.3d 1299, 1303 (Fed. Cir. 2018)
- Enfish, LLC v. Microsoft Corp., 822 F.3d 1327, 1335–37 (Fed. Cir. 2016)
- Mobile Acuity Ltd. v. Blippar Ltd., 110 F.4th 1280, 1290 (Fed. Cir. 2024)
- Content Extraction & Transmission LLC v. Wells Fargo Bank, Nat'l Ass'n, 776 F.3d 1343, 1347–48 (Fed. Cir. 2014)
- McRO, Inc. v. Bandai Namco Games Am., Inc., 837 F.3d 1299, 1314 (Fed. Cir. 2016)
- In re Jobin, 811 Fed. App'x. 633, 637 (Fed. Cir. 2020)
- Elec. Power Grp., LLC v. Alstrom S.A., 830 F.3d 1350, 1353–54 (Fed. Cir. 2016)
- Intell. Ventures I LLC v. Capital One Bank (USA), 792 F.3d 1363, 1367–69 (Fed. Cir. 2015)

- OIP Techs. Inc. v. Amazon.com, Inc., 788 F.3d 1359, 1362–64 (Fed. Cir. 2015)
- Ultramercial, Inc. v. Hulu, LLC, 772 F.3d 709, 714–17 (Fed. Cir. 2014)
- buySAFE, Inc. v. Google, Inc., 765 F.3d 1350, 1354–55 (Fed. Cir. 2014)
- Free Stream Media Corp. v. Alphonso Inc., 996 F.3d 1355, 1363 (Fed. Cir. 2021)
- Smart Systems Innovations, LLC v. Chicago Transit Authority, 873 F.3d 1364, 1372 (Fed. Cir. 2017)
- Bascom Global Internet Services, Inc. v. AT&T Mobility LLC, 827 F.3d 1341, 1349 (Fed. Cir. 2016)
- Bot M8 LLC v. Sony Corp. Am., 4 F.4th 1342, 1353 (Fed. Cir. 2021)
- Disc Disease Sols. Inc. v. VGH Sols., Inc., 888 F.3d 1256, 1260 (Fed. Cir. 2018)
- Boston Sci. Corp. v. Nevro Corp., 415 F. Supp. 3d 482, 489 (D. Del. 2019)
- SIPCO, LLC v. Streetline, Inc., 230 F. Supp. 3d 351, 353 (D. Del. 2017)
- Recentive Analytics, Inc. v. Fox Corp., 692 F. Supp. 3d 438, 451 (D. Del. 2023), aff'd, 134 F.4th 1205 (Fed. Cir. 2025)

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