

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

VTT Technical Research Centre of Finland Ltd. v. HID Global Corporation et al.

VTT Technical Research Centre · No. 1:25-cv-00229 · Decided November 24, 2025

SUMMARY

The United States District Court for the District of Delaware denied defendants’ Rule 12(b)(6) motion to dismiss a patent infringement action involving U.S. Patent No. 7,724,143. The court held that the complaint plausibly alleged direct infringement of the patent’s “primary source” limitation, indirect infringement, and infringement claims against Omni-ID USA, Inc. The court emphasized that disputes concerning infringement merits and claim construction were not appropriately resolved at the pleading stage.

CASE DETAILS

COURT	United States District Court for the District of Delaware
WRITING FOR THE COURT	John Campbell Barker
JURISDICTION	United States District Court for the District of Delaware
DECIDED	November 24, 2025
DOCKET	1:25-cv-00229
DISPOSITION	denied
PROCEDURAL POSTURE	Plaintiff brought a patent-infringement action against HID Global Corporation and Omni-ID USA, Inc. Defendants moved to dismiss under Federal Rule of Civil Procedure 12(b)(6) for failure to state a claim.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts well-pleaded factual allegations as true, disregards legal conclusions, and determines whether the facts plausibly show an entitlement to relief. The complaint is construed in the light most favorable to the plaintiff. In patent cases, the complaint need not plead infringement on an element-by-element basis but must provide factual allegations plausibly articulating why the accused product infringes.
PRECEDENTIAL VALUE	unpublished

TOPICS

patent infringement

patent law

motions to dismiss

pleadings

civil procedure

PRACTICE AREAS

patent law

patent infringement

civil procedure

commercial litigation

QUESTIONS PRESENTED

1. Whether the complaint plausibly alleged direct infringement of claim 1's limitation that the fold acts as a primary source of a magnetic field.
2. Whether the complaint plausibly alleged indirect infringement, including pre-suit knowledge of the asserted patent and specific intent to induce infringement.
3. Whether the complaint plausibly stated patent-infringement claims against Omni-ID USA, Inc. based on allegations that HID acquired Omni-ID and jointly developed, manufactured, and sold the accused products with it.

HOLDINGS

1. The complaint adequately pleaded direct infringement because its claim chart alleged that the fold region acted as a primary source of a magnetic field by forming a continuous conductive loop between the antenna's first and second surfaces and producing a localized magnetic dipole.
2. The complaint adequately pleaded indirect infringement by alleging facts supporting pre-suit knowledge of the asserted patent and by alleging that defendants supplied materials and instructions intended to cause third parties to infringe.
3. The complaint adequately stated infringement claims against Omni-ID because allegations that HID acquired Omni-ID and that the companies jointly developed, manufactured, and sold the allegedly infringing technology were sufficient to provide notice and permit further discovery.

KEY QUOTATIONS

"A plaintiff need not prove its case at the pleading stage." (at 4)

"Instead, it is enough that a complaint place the alleged infringer on notice of what activity is being accused of infringement." (at 4)

"The purpose of a motion to dismiss is to test the sufficiency of the complaint, not to decide the merits." (at 6)

"these allegations, which must be taken as true, are sufficient at the pleadings stage to make it plausible that [defendants] indeed intended that its customers infringe" (at 8)

FACTUAL BACKGROUND

VTT alleged that HID Global Corporation and Omni-ID USA, Inc. infringed claim 1 of U.S. Patent No. 7,724,143, which covers an antenna construction for RFID transponders and requires a fold acting as a primary source of a magnetic field. VTT's claim chart identified the accused RFID products and alleged that the fold region formed a continuous conductive loop producing a localized magnetic dipole. VTT also alleged that HID

had received a 2018 letter identifying the asserted patent, supplied promotional and instructional materials to third parties, and jointly developed, manufactured, and sold accused products with Omni-ID after acquiring Omni-ID.

PROCEDURAL HISTORY

VTT Technical Research Centre of Finland Ltd. filed a complaint alleging infringement of U.S. Patent No. 7,724,143 by defendants' RFID products. Defendants moved to dismiss allegations of direct infringement, indirect infringement, and infringement by Omni-ID USA, Inc. The court denied the motion to dismiss and ordered defendants to answer or otherwise respond within 14 days under Rule 12(a)(4)(A).

DISPOSITION

denied

CASES CITED

- Disc Disease Sols. Inc. v. VGH Sols., Inc., 888 F.3d 1256 (Fed. Cir. 2018)
- Fowler v. UPMC Shadyside, 578 F.3d 203 (3d Cir. 2009)
- Ashcroft v. Iqbal, 556 U.S. 662 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544 (2007)
- Pension Benefit Guar. Corp. v. White Consol. Indus., Inc., 998 F.2d 1192 (3d Cir. 1993)
- Schmidt v. Skolas, 770 F.3d 241 (3d Cir. 2014)
- Bot M8 LLC v. Sony Corp. of Am., 4 F.4th 1342 (Fed. Cir. 2021)
- Mallinckrodt IP Unlimited Co. v. B. Braun Med., Inc., No. 1:17-cv-00365, 2018 WL 2254540, at *1 (D. Del. May 17, 2018)
- Nalco Co. v. Chem-Mod, LLC, 883 F.3d 1337 (Fed. Cir. 2018)
- Global-Tech Appliances, Inc. v. SEB S.A., 563 U.S. 754 (2011)
- Varian Med. Sys. v. Elekta AB, No. 1:15-cv-00871, 2016 WL 3748772, at *3 (D. Del. July 12, 2016), R. & R. adopted by 2016 WL 9307500 (D. Del. Dec. 22, 2016)
- Jackson v. Seaspine Holdings Corp., No. 1:20-cv-01784, 2022 WL 610703, at *5 (D. Del. Feb. 14, 2022)
- Lifetime Indus., Inc. v. Trim-Lok, Inc., 869 F.3d 1372 (Fed. Cir. 2017)
- MEMC Elec. Materials, Inc. v. Mitsubishi Materials Silicon Corp., 420 F.3d 1369 (Fed. Cir. 2005)
- AlexSam, Inc. v. Aetna, Inc., 119 F.4th 27 (Fed. Cir. 2024)
- Phonometrics, Inc. v. Resinter N. Am. Corp., 124 F.3d 229, 1997 WL 580519, at *2 (Fed. Cir. Sept. 17, 1997)
- M2M Sols. LLC v. Telit Commc'ns PLC, No. 1:14-cv-01103, 2015 WL 4640400, at *3 (D. Del. Aug. 5, 2015)
- Ethypharm S.A. Fr. v. Bentley Pharms., Inc., 388 F. Supp. 2d 426 (D. Del. 2005)