

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF  
CALIFORNIA

Omnitracs, LLC v. Motive Technologies, Inc.

No. 23-cv-05261-RFL, 2025 WL [not provided] (N.D. Cal. Aug. 5, 2025) · No. 23-cv-05261-RFL · Decided  
August 5, 2025

SUMMARY

The United States District Court for the Northern District of California resolves the parties’ post-trial motions in a patent infringement action involving the ’906, ’628, ’060, and ’253 patents. The court grants Motive Technologies’ renewed motion for judgment as a matter of law, holding the asserted claims of the ’628 and ’906 patents patent-ineligible under 35 U.S.C. § 101, and denies Omnitracs’ motions concerning infringement, eligibility, and a new trial. The court concludes that substantial evidence supported the jury’s non-infringement and invalidity-related findings and rejects Omnitracs’ arguments regarding trial conduct and verdict-form bifurcation.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Northern District of California                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| WRITING FOR THE COURT | Rita F. Lin                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| JURISDICTION          | United States District Court for the Northern District of California                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| DECIDED               | August 5, 2025                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| DOCKET                | 23-cv-05261-RFL                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| DISPOSITION           | other                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| PROCEDURAL POSTURE    | Post-trial motions following a jury verdict of non-infringement. Defendant moved for judgment as a matter of law that asserted claims of the '628 and '906 patents were patent-ineligible under 35 U.S.C. § 101. Plaintiffs moved for judgment as a matter of law on infringement and patent eligibility issues and moved for a new trial.                                                                                                                                                                                                               |
| STANDARD OF REVIEW    | Under Rule 50(b), the jury's verdict must be upheld if supported by substantial evidence, and the court may not weigh the evidence or substitute a more reasonable result when substantial evidence supports the verdict. Rule 59 permits a new trial when the verdict is contrary to the clear weight of the evidence, rests on false or perjurious evidence, or a new trial is necessary to prevent a miscarriage of justice. Patent eligibility under § 101 is a question of law, although underlying factual questions may be submitted to the jury. |

## TOPICS

patent eligibility

patent infringement

motion for new trial

civil procedure

intellectual property

## PRACTICE AREAS

patent law

patent infringement

patent eligibility

civil procedure

post-trial motions

## QUESTIONS PRESENTED

1. Whether the jury's finding that the asserted claims of the '628 and '906 patents were well-understood, routine, and conventional was subject to review under Rule 50(b) rather than Rule 52(a)(1).
2. Whether the asserted claims of the '628 and '906 patents were directed to patent-ineligible abstract ideas under Alice step one.
3. Whether substantial evidence supported the jury's finding that the asserted claims of the '628 and '906 patents lacked an inventive concept under Alice step two.
4. Whether substantial evidence supported the jury's verdict that Motive did not infringe the asserted claims of the '628, '060, and '253 patents.
5. Whether Omnitrac was entitled to a new trial based on alleged evidentiary, advocacy, verdict-form, bifurcation, or other trial errors.

## HOLDINGS

1. The jury's finding that the asserted claims were well-understood, routine, and conventional was not merely advisory; Motive's renewed motion was properly evaluated under Rule 50(b).
2. The asserted claims of the '628 patent are directed to the abstract idea of receiving, associating, analyzing, and presenting fleet-management data.
3. The asserted claims of the '628 and '906 patents lack an inventive concept because, individually and as an ordered combination, they recite well-understood, routine, and conventional activities.
4. Substantial evidence supported the jury's finding that Motive did not infringe the asserted claims of the '628 patent.
5. Substantial evidence supported the jury's finding that Motive did not infringe the asserted claims of the '060 patent.
6. Substantial evidence supported the jury's finding that Motive did not infringe the asserted claims of the '253 patent.
7. Omnitrac was not entitled to a new trial because the challenged conduct and rulings were not sufficiently prejudicial and the verdict was not contrary to the clear weight of the evidence.

## KEY QUOTATIONS

*“When a special verdict is sought from a jury, the appropriate procedure is for the court to accept the findings of fact explicitly made or implicit in the jury’s answers and, based thereon and on such additional findings as the court may find necessary to make [] direct entry of judgment under Rule 58.” (Section I)*

*“A new trial should be granted when “the verdict is contrary to the clear weight of the evidence, is based upon false or perjurious evidence, or to prevent a miscarriage of justice.”” (Section III)*

## FACTUAL BACKGROUND

Omnitracs asserted claims from four fleet-management patents against Motive's products. The asserted claims generally involved receiving, processing, transmitting, and presenting fleet-management data using generic computing devices, including claims involving driver reports, HTTP communication, and frame values associated with vehicle events. At trial, Motive presented evidence that comparable two-device systems and periodic data transmission were commercially available and conventional, and that its accused products did not perform the claimed report transmission, HTTP-server communication, or frame-value determination.

## PROCEDURAL HISTORY

The jury returned a verdict on April 24, 2025, finding that Motive did not infringe the asserted claims of the '906, '628, '060, and '253 patents. The jury found the asserted claims of the '906 and '628 patents not invalid but found that their activities were well-understood, routine, and conventional. The court granted Motive's renewed motion for judgment as a matter of law on patent eligibility, denied Omnitracs' renewed motions concerning infringement and eligibility, and denied Omnitracs' motion for a new trial.

## DISPOSITION

other

## CASES CITED

- Johnson v. Paradise Valley Unified Sch. Dist., 251 F.3d 1222, 1227 (9th Cir. 2001)
- Mosesian v. Peat, Marwick, Mitchell & Co., 727 F.2d 873, 877 (9th Cir. 1984)
- Quaker City Gear Works, Inc. v. Skil Corp., 747 F.2d 1446, 1452 (Fed. Cir. 1984)
- Hawk Tech. Sys., LLC v. Castle Retail, LLC, 60 F.4th 1349, 1356-57 (Fed. Cir. 2023)
- Elec. Power Grp., LLC v. Alstom S.A., 830 F.3d 1350, 1351-54 (Fed. Cir. 2016)
- Immersion Corp. v. Fitbit, Inc., 313 F. Supp. 3d 1005, 1028-29 (N.D. Cal. 2018)
- In re TLI Commc'ns LLC Patent Litig., 823 F.3d 607, 612-14 (Fed. Cir. 2016)
- OIP Techs., Inc. v. Amazon.com, Inc., 788 F.3d 1359, 1363 (Fed. Cir. 2015)
- Miller Mendel, Inc. v. City of Anna, Texas, 107 F.4th 1345, 1353 (Fed. Cir.), cert. denied, 145 S. Ct. 593 (2024)
- Cave Consulting Grp., Inc. v. Truven Health Analytics Inc., No. 15-cv-02177-SI, 2017 WL 6405621, at \*6 (N.D. Cal. Dec. 15, 2017), aff'd, 756 F. App'x 997 (Fed. Cir. 2019)
- In re Salwan, 681 F. App'x 938, 939-41 (Fed. Cir. 2017)

- *Molski v. M.J. Cable, Inc.*, 481 F.3d 724, 729 (9th Cir. 2007)
- *Passantino v. Johnson & Johnson Consumer Prods.*, 212 F.3d 493, 510 n.15 (9th Cir. 2000)
- *Cones v. County of Los Angeles*, No. CV 14-8281 PSG (PLAx), 2016 WL 7438817, at \*7 (C.D. Cal. Sept. 28, 2016)
- *Experience Hendrix L.L.C. v. Hendrixlicensing.com Ltd.*, 762 F.3d 829, 842 (9th Cir. 2014)
- *United States v. Whitworth*, 856 F.2d 1268, 1285 (9th Cir. 1988)
- *Mitchell v. Black & Decker (USA) Inc.*, 6 Fed. App'x 652, 653 (9th Cir. 2001)
- *Estate of Diaz v. City of Anaheim*, 840 F.3d 592, 603 (9th Cir. 2016)
- *Mformation Techs., Inc. v. Research in Motion Ltd.*, No. C 08-04990, 2012 WL 1142537, at \*1-\*2 (N.D. Cal. Mar. 29, 2012)