

Susman Godfrey Client Defeats “Abstract Idea” Motion to Dismiss Patent Claims

The U.S. District Court for the District of Delaware has denied a motion to dismiss the claims Data Health Partners for infringement of patents relating to optimizing goal progression and outcomes.

Teladoc Health had sought dismissal of Data Health’s claims on the ground the patents recited an “abstract idea” instead of a patentable invention. Sitting by designation, U.S. Court of International Trade Judge Jennifer Choe-Groves ruled that a representative claim “is directed to the non-abstract idea of improving the monitoring of patient goals and outcomes.” Because the claim satisfied the two-step test in *Alice Corp. Pty. Ltd. v. CLS Bank Int’l* for patent eligibility at the first step, “the Court need not discuss *Alice*’s step two.”

“We heartily agree with Judge Choe-Groves’s cogent analysis,” said [Barry Barnett](#), the Susman Godfrey partner in charge of the *Data Health* case. “We look forward,” he added, “to our next steps in enforcing this extraordinarily valuable family of patents.”

The three patents in suit resulted from a rigorous problem-solving approach that new leadership put into effect at a school in Virginia for students with special needs. Their invention enabled the school to reduce traumatic incidents involving students to near zero. Susman Godfrey associate [Monica Daegele](#) and intellectual property advisor Santos Garza also serve on the Data Health trial team.

The case is *Data Health Partners, LLC v. Teladoc Health, Inc.* Case No. 1:23-cv-00160 in the District of Delaware.