Dell Inc. v. Disposition Servs. LLC., 944 patent claims were directed to an abstract idea of handling a customer's physical item in such a way that the customer can verify that its handling instructions were followed. The panel rejected that argument, stating that under Alice Corp., the fact that an asset exists in the physical realm is irrelevant to the § 101 inquiry. The panel also concluded that modes of disposition involving the physical transformation of the asset, such as refurbishing, dismantling, dysfunctioning, reclaiming, and destroying the asset merely constitute "insignificant extra-solution activity" that cannot transform an unpatentable process into a patentable one. The panel found computer and database limitations recited in some of the claims were not meaningful given that the function performed by the computer was purely conventional. Lastly, the panel rejected the patent owner's argument that the claims of the '944 patent are designed to solve a technological problem, writing that "the claims do not add any inventive concept to the abstract idea of handling a customer's physical item in such a way that the customer can verify that its handling instructions were followed."

Dell Inc. v. Disposition Servs. LLC., No. CBM2013-00040 (PTAB Jan. 9, 2015) [Medley, Turner, Clements (opinion)].