

Press Coverage | May 17, 2016

# Fed. Circ. Upholds Nixing of Abstract Photo-Sharing Patent

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[Robert A. Angle](#)

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Troutman Sanders and Robert Angle were mentioned in a May 17 *Law360* [article](#) and a May 18 *Bloomberg BNA* [article](#) about the Federal Circuit's decision in *TLI Communications v. AV Automotive* affirming the U.S. District Court for Eastern District of Virginia's invalidation of TLI's patent under the Supreme Court's decision in *Alice v. CLS Bank*.

Significantly, the Federal Circuit's decision distinguished the court's decision from the week before in *Enfish v. Microsoft*, which held that computer functionality improvements can save patents from otherwise being deemed abstract under *Alice*. In 2014, TLI alleged that Apple, Google, Facebook, Twitter, Snapchat, Yahoo!, and several other social network companies, as well as Capital One, infringed its '295 patent, which covers a method and system for taking, transmitting and organizing digital photographs over a computer network.

In addition to Capital One, Robert represented Twitter, Snapchat, Yahoo!, and several of the other social network companies.

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