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## Judge Says Twiqbal Should Apply To Patent Cases

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Richmond partner Dabney Carr and associate Stan Hammer were mentioned in a March 12 *Law360* article – “[Judge Says Twiqbal Should Apply To Patent Cases](#)” – for their role as counsel for Spansion Inc. in a patent infringement lawsuit filed against the company by Macronix International Co. Ltd. that claimed the flash memory company had infringed seven of its patents related to memory devices and data transmission.

Senior U.S. District Judge Robert Payne dismissed most of the claims against the firm's client. In doing so, he held that patent complaints must satisfy the heightened pleading standards set forth by the Supreme Court in *Bell Atlantic v. Twombly* and *Ashcroft v. Iqbal*, thereby winnowing out weak or baseless claims.

“It will mean taking great care when crafting a succinct, but sufficient, patent complaint,” Judge Payne wrote. “But that is not asking too much.”