**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

T-REX PROPERTY AB,

                    Plaintiff,

     v.

AUTONETTV MEDIA, INC.,

                Defendant.

Civil Action No.: 16-cv-6649

JURY TRIAL DEMANDED

**MEMORANDUM OF LAW IN SUPPORT OF AUTONETTV MEDIA, INC.'S
RULE 12(b)(6) MOTION TO DISMISS FOR
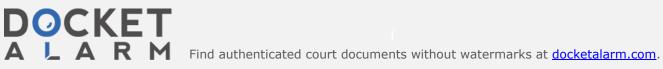FAILURE TO STATE A CLAIM**

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Defendant AutoNetTV Media, Inc., ("AutoNetTV") moves to dismiss this case because the Complaint does not state a claim upon which relief can be granted. Specifically, the patent claims asserted in the Complaint are invalid because they are directed to the abstract idea of displaying information in public places based on third party instructions. The patentees acknowledged that they did not invent the concept of scheduling the display of information in public spaces. Instead, they sought to allow third parties to choose in real-time what information is displayed. But the asserted claims merely cobble together generic computer components (i.e., computers, a database, a modem, a projector, televisions, and cameras), and then claim the end result of dynamic updates and third-party control that is not limited to a specific mechanism for achieving that result. Therefore, the asserted claims are patent-eligible subject matter. Since resolving this issue does not require discovery or formal claim construction, AutoNetTV respectfully requests that the Court dismiss the complaint pursuant to Fed. R. Civ. P. 12(b)(6).

I. BACKGROUND

On June 24, 2016, Plaintiff T-Rex filed this lawsuit accusing AutoNetTV of infringing claims 25 and 26 of U.S. Patent No. RE39,470 (the "'470 Patent"), claims 22 and 32 of U.S. Patent No. 7,382,334 (the "'334 Patent"), and claims 42 and 43 of U.S. Patent No. 6,430,603 (the "'603 Patent"). T-Rex has filed 59 lawsuits since June 2012 in this and other districts involving one or more of the Patents-in-Suit and the alleged infringement by digital display boards and billboards.

A. The Patents-in-Suit disclose nothing more than using generic computer components to perform a task that was previously done manually.

The '470 and '334 Patents are both entitled "Digital Information System." The '603 Patent is entitled, "System for Direct Placement of Commercial Advertising, Public Service Announcements and Other Content on Electronic Billboard Displays."

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