Netflix Sinks Robocast Playlist Patents In Del. IP Suit

By **Andrea Keckley**

Law360 (February 24, 2025, 4:54 PM EST) -- A Delaware federal judge has sided with Netflix's arguments that a trio of Robocast patents covering playlist technology are invalid.

All the asserted claims are "likewise directed to organizing and displaying playlists of content," and the Federal Circuit has made clear that such technologies are abstract, U.S. District Judge Jennifer L. Hall said Friday.

"None of the asserted claims contain any specificity as to how to accomplish the tasks of generating a playlist of content, accessing content (except to say generally that it is done 'automatically' and 'without requiring user input'), organizing and displaying content (except to say that it is put into an 'organized arrangement'), or permitting the user to adjust the duration of the display of content," according to her order.

Parties in this case did not immediately respond to requests for comment.

The patents — U.S. Patent Nos. 7,155,451; 8,606,819; and 8,965,932 — concern methods for automatically delivering and presenting web content, according to Robocast. They cover both an "automated browsing system for publishers and users on networks serving internet and remote devices" and an "automated content scheduler and displayer."

The patents — all of which have since expired — are also the subject of an ongoing dispute with YouTube that has now been stayed in light of Friday's decision in the Netflix case. The complaints in both cases were filed on the same day in 2022.

After Netflix moved for summary judgment on invalidity grounds back in September, Robocast argued in a sealed filing that the asserted claims "are directed to a 'technological solution' to a 'technological problem,'" according to Friday's order.

Judge Hall disagreed, however, saying the problem Robocast identifies — in this case, the amount of "user effort and decision-making" needed for the prior art methods of browsing the web — is not technical nor unique to the internet.

"But even if it were, the 'solution' covered by the asserted claims is not a technical solution. It is the abstract idea of automating the task of 'collecting, organizing, and automatically displaying content (e.g., a playlist of Internet content),'" she wrote. "Calling something a technical solution does not make it so.

And just because a claim covers software does not make it a technical solution."

The patents-in-suit are U.S. Patent Nos. 7,155,451, 8,606,819 and 8,965,932.

Netflix is represented by Tara D. Elliott, Rachel Weiner Cohen, Ashley Fry, Diane Ghrist, Kimberly Li and Tiffany Weston of Latham & Watkins LLP and Kelly E. Farnan and Sara M. Metzler of Richards Layton & Finger PA.

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The case is Robocast Inc. v. Netflix Inc., case number 1:22-cv-00305, in the U.S. District Court for the District of Delaware.

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