

# Haynes Boone Wins Federal Circuit Dismissal for Unified Patents

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**PRACTICES** Patents, Patent Litigation, Intellectual Property Litigation, Appellate, Federal Circuit Practice

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Haynes Boone won a dismissal for [Unified Patents, LLC](#) before the U.S. Court of Appeals for the Federal Circuit in a case that reinforces the limits on when parties can challenge Patent Trial and Appeal Board (PTAB) decisions in federal court.

The court dismissed an appeal by Dolby Laboratories Licensing Corporation, holding Dolby lacked constitutional standing to challenge a PTAB decision regarding a Real Party in Interest (RPI) dispute.

The case, [Dolby Laboratories Licensing Corporation v. Unified Patents, LLC](#), began when Dolby challenged the board's handling of RPI identification in Unified Patents' *inter partes review* of U.S. Patent No. 10,237,577, covering video compression methods.

The Federal Circuit ruled that Dolby's alleged injuries were too speculative to meet standing requirements, as the board had ruled in Dolby's favor on the underlying patent validity challenge, saying Dolby did not prove it suffered an "injury in fact" necessary to prove standing.

The victory marks the second appellate win for Haynes Boone at the Federal Circuit in the span of 8 days.

Chief Judge Moore, writing for the Federal Circuit panel, detailed that a statutory right to appeal does not override Article III standing requirements.

"It is well established that a statutory right to appeal under the America Invents Act (AIA) does not obviate the requirement for Article III standing," the court wrote. The court explained "there is no freestanding right" to have RPI disputes adjudicated, and that "the AIA does not create an informational right."

"The court's ruling is significant because it protects the efficiency of IPR proceedings in an appropriate manner," said Haynes Boone Partner [Angela Oliver](#), who argued before the Federal Circuit.

Haynes Boone Federal Circuit Practice Group Chair [Debbie McComas](#) supported Oliver on the appellate team.

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