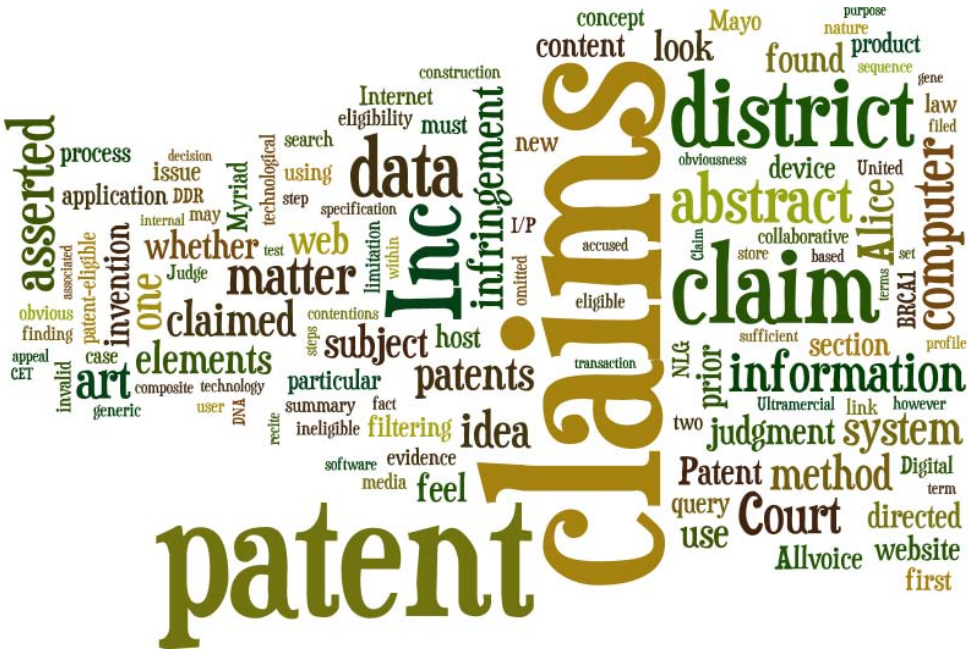
On this one year anniversary of the Supreme Court's decision in *Alice Corp*., much of the Section 101 jurisprudence still remains a little jumbled, which gave us at Dunlap Codding, an idea: What would *Alice* and its progeny look like as word jumbles?

The above word jumble depicts the most frequently found words in the *Alice* decision. The jumbles were created by feeding the text of the indicated opinions into wordle.com and then removing certain common-words (e.g. court, defendant, patent, plaintiff, U.S.) and numbers (e.g. 2013, 2014, and 2015) post-tabulation to improve clarity.

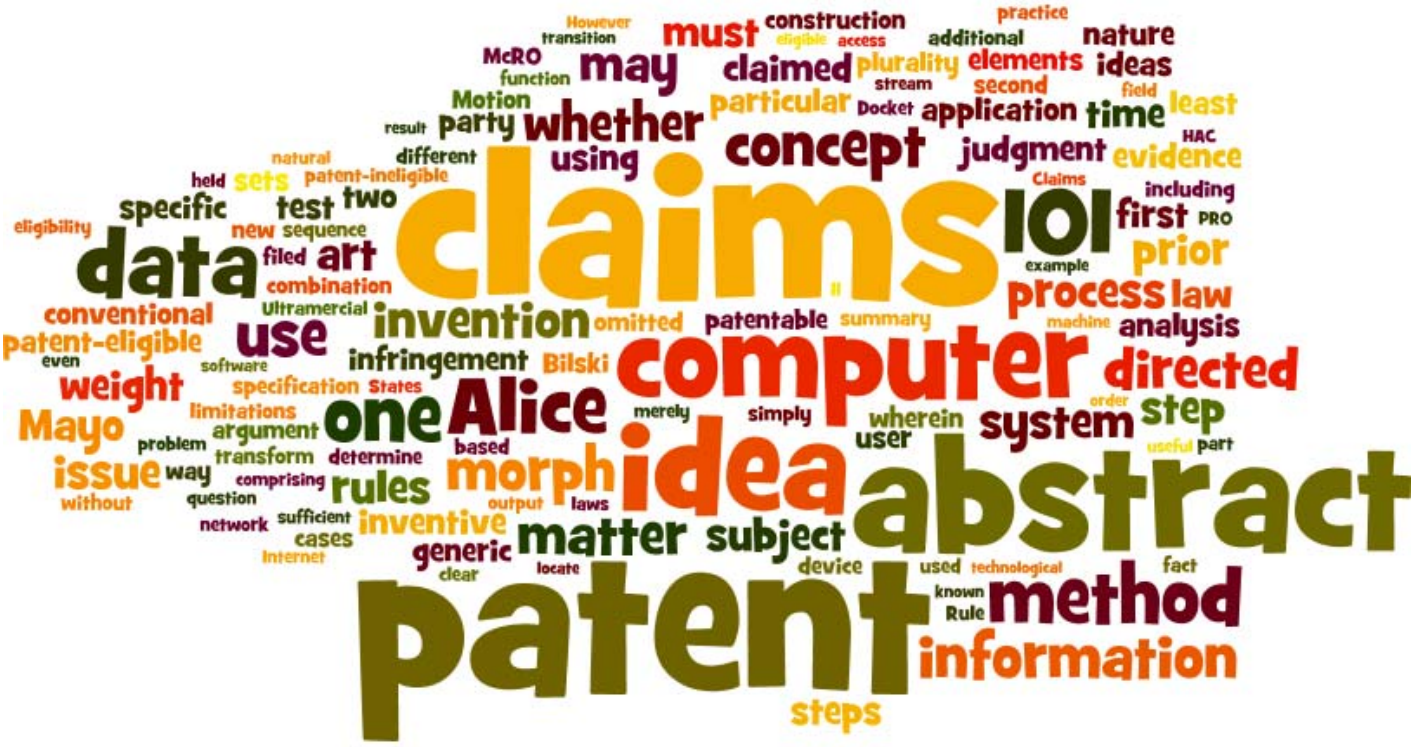
The word jumbles highlighted at least two interesting things: (1) the Supreme Court's *Alice* analysis seems to be more fact intensive than the 12 Federal Circuit and 115 District Court analyses (to date) and (2) the word "exception" appears with ironic frequency in the PTO's guidelines given the ubiquity of 101 rejections in prosecution.

United States Supreme Court *Alice* Decision

12 Opinions from the Court of Appeals of the Federal Circuit citing *Alice*



115 Opinions from the U.S. District Courts citing *Alice*



USPTO December 2014 Interim Guidance based on *Alice*

Patent Trial and Appeal Board Covered Business Method Patent Review Final Decisions citing *Alice*

100 Patent Trial and Appeal Board Ex Parte Appeal Final Decisions citing *Alice*

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