

GE LIGHTING SOLUTIONS, LLC v. AGILIGHT, INC., Appeal No. 2013-1267 (Fed. Cir. May 1, 2014). Before Rader, Moore, Reyna. Appealed from N.D. Ohio (Judge Gwin).

Background:

GE sued AgiLight, alleging infringement of three patents related to LEDs and the production thereof. The district court construed claims for each of the patents, including (1) "an insulation displacement connector" ("IDC connector"), (2) "an optical element having a substantially ellipsoidal inner profile and generally spherical outer profile," and (3) "an annular gasket." After claim construction, the district court granted AgiLight's motion for summary judgment of noninfringement of the asserted patents. GE appealed.

Issue/Holding:

Did the district court err in its construction of the claims? Yes and no; affirmed-in-part, reversed-in-part and remanded.

Discussion:

With regard to the term "IDC connector," the district court departed from the plain and ordinary meaning, limiting the term to a "more specialized IDC connector" based on a single disclosed embodiment. The Federal Circuit noted that the specification and prosecution history only compel departure from the plain meaning in two instances: lexicography and disavowal. The Federal Circuit held that the specification does not define IDC connector to include an indication that the inventors intended to act as their own lexicographers, or to limit the IDC connector to the single disclosed embodiment. The Federal Circuit also found that there were no clear and unmistakable prosecution history statements constituting disavowal. The Federal Circuit therefore held that the district court incorrectly construed the term "IDC Connector."

The district court interpreted "optical element having a substantially ellipsoidal inner profile and generally spherical outer profile" to mean that the entirety of the inner profile of the lens must be substantially ellipsoidal, rather than just a portion of the lens. The Federal Circuit found that the district court's construction would improperly exclude the specification's only disclosed embodiment. Because "it is incorrect to construe claims to exclude [a specific embodiment], absent probative evidence to the contrary," the district court erred when it required the entire inner profile to be substantially ellipsoidal. The Federal Circuit held that there was a genuine issue of material fact as to whether AgiLight's element includes a "substantially ellipsoidal inner profile."

The Federal Circuit affirmed the district court's construction of "annular gasket" as a three-dimensional deformable material with an opening in its center capable of sealing off its center area between stationary parts to make a joint, in accordance with the plain and ordinary meaning of the term. Accordingly, the Federal Circuit affirmed the district court's ruling that there was no genuine issue of material fact because AgiLight's lens lacked an opening.

Judge Reyna dissented-in-part to the majority's interpretation of "substantially ellipsoidal inner profile and generally spherical outer profile," arguing that the holding is inconsistent with the context and plain meaning of the claims, and that GE disclaimed the majority's claim construction during prosecution.