

IN RE PAPST LICENSING DIGITAL CAMERA PATENT LITIGATION,

Appeal No. 2014-1110 (Fed. Cir. February 2, 2015). Before Taranto, Schall, and Chen.

Appealed from D.D.C. (Judge Collyer).

Background:

Papst sued numerous digital camera manufacturers in multiple jurisdictions for allegedly infringing the claims of its patents directed to an interface device for transferring data between an input/output data device and a host computer. These cases were subsequently consolidated and transferred to the D.C. district court. Claim 1 of one of these patents, reproduced on the reverse side of this document, was treated by the court as a representative claim.

The district court construed several phrases within the claims, the most relevant being (i) "interface device," (ii) "data transmit/receive device," (iii) "second connecting device," (iv) "virtual files," recited in dependent claims, and (v) "input/output device customary in a host device." Relying solely on intrinsic evidence, the district court held that (i) the "interface device" must be a separate, stand-alone element, (ii) the "data transit/receive device" transmits to or receives data from the host device "when connected to the host device by the interface device," and (iii) the "second connecting device" must be a "a physical plug or socket for permitting a user readily to attach and detach the interface device with a plurality of dissimilar data transmit/receive devices." The court also (iv) limited the "virtual files" to data "originating from the data transmit/receive device," and it (v) ruled that the "input/output devices customary in a host device" are types of devices "normally present within the chassis" of a computer.

In view of the above narrow constructions of these terms, the district court granted the defendants' motions for summary judgment of non-infringement.

Issue/Holding:

Did the district court misconstrue Papst's patent claims, and thus err in granting the defendants' summary judgment motions? Yes, vacated and remanded.

Discussion:

In construing the claims of Papst's patents, the Federal Circuit applied its "familiar approach to claim construction" and looked to the intrinsic record of these patents, e.g., their written descriptions, the language of the claims themselves, and their prosecution histories. It particularly opined that absent persuasive reasons to the contrary, what the written description presents as mere embodiments should not be used to limit the language of the claims. The Federal Circuit also focused heavily on what the patents described as the advancements over the prior art, pointing out that limiting constructions are less preferred when they are "foreign to what is described as the invention's advance."

Applying this framework, the Federal Circuit generally held that the claim constructions adopted by the district court were inconsistent with the language of the claims themselves, the written descriptions, and the prosecution histories. It therefore rejected all five constructions at issue and vacated the district court's entry of final judgment.

1. An interface device for communication between a host device, which comprises drivers for input/output devices customary in a host device and a multi-purpose interface, and a data transmit/receive device, the data transmit/receive device being arranged for providing analog data, comprising:

a processor;

a memory;

a first connecting device for interfacing the host device with the interface device via the multi-purpose interface of the host device; and

a second connecting device for interfacing the interface device with the data transmit/receive device, the second connecting device including a sampling circuit for sampling the analog data provided by the data transmit/receive device and an analog-to-digital converter for converting data sampled by the sampling circuit into digital data,

wherein the interface device is configured by the processor and the memory to include a first command interpreter and a second command interpreter,

wherein the first command interpreter is configured in such a way that the command interpreter, when receiving an inquiry from the host device as to a type of a device attached to the multi-purpose interface of the host device, sends a signal, regardless of the type of the data transmit/receive device attached to the second connecting device of the interface device, to the host device which signals to the host device that it is an input/output device customary in a host device, whereupon the host device communicates with the interface device by means of the driver for the input/output device customary in a host device, and

wherein the second command interpreter is configured to interpret a data request command from the host device to the type of input/output device signaled by the first command interpreter as a data transfer command for initiating a transfer of the digital data to the host device.