

IN RE: POWER INTEGRATIONS, INC., Appeal No. 2017-1304 (Fed. Cir. March 9, 2018). Before Moore, Mayer, and Stoll. Appealed from the Patent Trial and Appeal Board.

Background:

Plaintiff sued the Defendant for patent infringement in district court which held Plaintiff's patent was not anticipated/obvious. However, the PTAB, in a reexamination initiated by the Defendant during the district court proceedings, found that the patent was anticipated.

The district court and PTAB applied two different claim constructions for the following claim feature: "...the digital to analog converter coupled to the counter, the counter causing the digital to analog converter to adjust the control input and to vary the switching frequency of the power supply."

The district court, based on the plain meaning of the claim language and in light of the specification, construed the "coupled...causing" language as requiring the signal outputted by the counter to be received by the digital to analog converter in order for the counter to directly cause the digital to analog converter to adjust the control input. In contrast, the PTAB relied on a dictionary to more broadly define the above terms as merely requiring the two components to be joined in a single circuit and thus, under the PTAB's interpretation, the signal output by the counter could be modified prior to being received by the digital to analog converter.

Plaintiff appealed the PTAB's finding of anticipation.

Issue/Holding:

Was the PTAB's affirmance based on an erroneous claim construction? Yes, reversed.

Discussion:

In reversing the PTAB's decision, the Federal Circuit reasoned that "claim construction must begin with the words of the claims themselves" and that by its plain terms, claim 1 requires the counter to cause the converter to adjust the control input and to vary the switching frequency.

Further, the Federal Circuit reasoned that PTAB's interpretation of the claim feature was unsupported by the specification, noting that every embodiment disclosed in the specification showed a counter that passes control signals to the digital to analog converter and that the focus of the patent was to eliminate unnecessary components and create a more compact circuit. The Federal Circuit noted that "a proper claim construction analysis endeavors to assign a meaning to a disputed claim term that corresponds with how the inventor describes his invention in the specification."

The Federal Circuit concluded that the claim language requires that the counter, not some other circuit element, cause the digital to analog converter to adjust the control input.

In contrast, each reference cited by the PTAB required memory to change the signal outputted from the counter before reaching the digital to analog converter, resulting in effectively "decoupling" the counter with the digital to analog converter since the control signal sent by the counter is not received by the digital to analog converter.

The Federal Circuit concluded that the PTAB's claim construction was erroneous and that the district court's claim construction comported with the broadest reasonable construction, and accordingly reversed the PTAB's rejection of the claims.