

LITTLEFUSE, INC. v. MERSEN USA EP CORP., Appeal No. 2021-2013 (Fed. Cir. April 4, 2022). Before Prost, Bryson, and Stoll. Appealed from D. Mass (Judge Talwani).

Background:

Littlefuse sued Mersen for infringement of its patent directed to a fuse end cap. The independent claims are directed to an end cap including a mounting cuff, a terminal, and a fastening stem extending between the mounting cuff and the terminal. The relevant dependent claims further define single-piece embodiments of the end cap. During claim construction, Mersen argued that the independent claims should be construed to only cover multi-piece embodiments in which the fastening stem attaches the mounting cuff to the terminal. Littlefuse instead contended that the independent claims should cover both multi-piece embodiments and single-piece embodiments in which the mounting cuff and the terminal are formed according to a unibody design.

The district court construed the term "fastening stem" to mean a "stem that attaches or joins other components," and in the context of the independent claims, the fastening stem attached the mounting cuff to the terminal. The district court concluded that this construction excludes the single-piece embodiments recited in the dependent claims. Littlefuse appealed the district court's claim construction.

Issue/Holding:

Did the district court err in construing the term "fastening stem" in the independent claims to preclude single-piece embodiments? Yes, vacated and remanded.

Discussion:

The Federal Circuit found that the district court's construction of the independent claims was inconsistent with the plain language of the claims and the specification does not preclude the independent claims from covering single-piece embodiments. The Federal Circuit stated that a proper claim construction should start with a plain reading of the claims and, relying on precedent, reasoned that any claim interpretation should construe the independent claims such that they are differentiated from the dependent claims so as to not render their scope superfluous. Here, since the dependent claims explicitly define single-piece embodiments, the Federal Circuit held that this is persuasive evidence that the independent claims are not limited to multi-piece embodiments. However, the Federal Circuit noted that this presumption may be overcome by a contrary construction shown in the prosecution history or the specification. The Federal Circuit did not find persuasive evidence in the prosecution history.

Turning to the specification, the Federal Circuit noted that the specification refers to the fastening stem only in multi-piece embodiments. However, the Federal Circuit held that courts should not limit the claimed invention to such preferred embodiments and that the specification does not teach that the fastening stem cannot also be found in single-piece embodiments. In that respect, the Federal Circuit reasoned that "one can envision a stem that projects from the side of the mounting cuff [when] the fuse end cap is formed from a single piece of material." Thus, the Federal Circuit remanded to the district court for reconsideration in light of concluding that the independent claims cover both single-piece and multi-piece embodiments.