

GENUINE ENABLING TECHNOLOGY LLC v. SONY GROUP CORPORATION,

Appeal No. 2024-1686 (Fed. Cir. February 19, 2026). Before Dyk, Taranto, and Chen. Appealed from D. Del. (Judge Goldberg).

Background:

Genuine Enabling Technology LLC (GET) owns a patent which relates to computer input devices that combine multiple input streams (e.g., keyboard, mouse, or sensors) into a single communication channel to reduce the number of dedicated computer resources required. The asserted claims include a means-plus-function limitation: “*encoding means* for synchronizing the user input stream with the input stream and encoding the same into a combined data stream.” In a *Markman* order, the district court held that “encoding means” invoked 35 U.S.C. § 112(f) because it failed to denote sufficient structure. The court identified the corresponding structure as logic block 34 in Figure 4A of the patent, which includes components that together synchronize the input streams using a bit-rate clock.

GET accused Sony’s PlayStation 3 and PlayStation 4 controllers, specifically their Bluetooth modules that synchronize button and sensor inputs, of infringement of the asserted claims. During discovery, GET relied on expert testimony to establish structural equivalence, but the expert’s analysis ultimately focused almost entirely on the bit-rate clock, largely disregarding other elements of logic block 34. After a *Daubert* ruling limiting the expert’s testimony, the district court granted summary judgment of noninfringement, finding that the expert failed to provide sufficient factual support explaining why the omitted components of the disclosed structure could be disregarded in the equivalence analysis.

Issue/Holding:

Did the district court err in granting summary judgment of noninfringement? No, affirmed.

Discussion:

The Federal Circuit held that GET failed to present sufficient evidence that the accused Bluetooth modules were structurally equivalent to the disclosed structure. For a means-plus-function limitation, literal infringement requires that the relevant structure in the accused device perform the identical function recited in the claim and be identical or equivalent to the corresponding structure in the specification. Structural equivalence is determined under the function-way-result-test.

The court found that GET’s expert focused almost exclusively on the presence of a bit-rate clock while ignoring other components of logic block 34 identified in the specification. Although a patentee need not conduct a strict component-by-component comparison, it must account for the overall disclosed structure or explain why the omitted elements are insignificant. GET failed to do so. Because the expert’s opinion did not sufficiently analyze how the accused devices performed the claimed function in substantially the same way as the disclosed structure, the evidence was insufficient to create a genuine dispute of material fact. The Federal Circuit therefore affirmed the district court’s grant of summary judgment of noninfringement.