CONSTELLATION DESIGNS, LLC v. LG ELECTRONICS INC., Appeal No. 2024-1822 (Fed. Cir. April 28, 2026). Before Lourie, Stoll, and Outken (by designation). Appealed from E.D. Tex. (Judge Gilstrap).

Background:

Constellation sued LG for infringement of patents involving digital communication systems that use non-uniform signal constellations which improve data transmission and picture quality. The district court found willful infringement, and the jury awarded damages. LG appealed the district court's summary judgment of patent eligibility under §101 and its denial of LG's JMOL of non-infringement.

Issues/Holdings:

Did the district court err in finding the claims eligible under §101? Yes and No. Did the district court err in denying JMOL of non-infringement? No. Vacated-in-part, affirmed-in-part, and remanded.

Discussion:

Regarding §101 patent eligibility, the Federal Circuit divided the asserted claims into "optimization claims" and "constellation claims." The Federal Circuit held that the optimization claims were directed to the abstract idea of "optimizing" a constellation for parallel decode capacity because the claims recited a result rather than how to achieve a constellation optimized for that capacity. In contrast, the Federal Circuit affirmed eligibility of the constellation claims because they recited specific constellation structure, including overlapping constellation point locations, which solved the technological problem of overcoming capacity constraints to improve coding gains.

Next, regarding the issue of JMOL of non-infringement, at trial Constellation relied on an industry broadcast television standard to show infringement of certain claim limitations and relied on product-specific evidence for other limitations. With respect to the standards-based evidence, Constellation argued that, because the television standard uses Constellation's patented constellations and because LG's televisions complied with the television standard, LG's televisions necessarily practiced the claim limitations at issue. On appeal, the Federal Circuit affirmed that Constellation can rely on standards-related evidence for some limitations and product-specific evidence for other limitations of the same claim. Based on this combination of evidence types presented at trial, the Federal Circuit affirmed the district court's denial of JMOL of non-infringement.

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NON-FEDERAL CIRCUIT HIGHLIGHT FOR MAY 20, 2026

A. Miscellaneous

As America's Branding Agency, the USPTO announced that it brought trademark and brand-protection education to the 2026 NFL Draft in Pittsburgh, Pennsylvania, last April 23-25, marking the first time the agency presented an on-the-ground educational presence at a major sports setting. As part of World IP Day events, Director Squires led a panel on demystifying the evolving world of name, image, and likeness (NIL), trademark protection, and the increasing risks posed by AI deepfake in an era where brand protection is increasingly valuable and increasingly vulnerable. The USPTO also operated an education booth during the event to provide practical resources on how trademarks work and common mistakes to avoid, and raised awareness so that players can make informed decisions about using their personal brands in commerce.

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