

SOCKET SOLUTIONS, LLC v. IMPORT GLOBAL, LLC, Appeal No. 2025-1121 (Fed. Cir. August 4, 2026). Before Moore, Prost, and Seeborg. Appealed from S.D. Fla. (Judge Leibowitz).

Background:

The plaintiff, Socket Solutions, sued Import Global, alleging infringement of a patent directed to an indoor electrical wall outlet cover that covers a standard indoor electrical outlet. Socket Solutions also moved for a preliminary injunction. The district court granted the injunction, which enjoined Import Global from manufacturing, using, selling, offering to sell, or importing into the United States its accused product. Import Global appealed, alleging errors in the district court’s claim construction, and asserting that the grant of the preliminary injunction was in error due to the district court’s likelihood of success analysis being based on these incorrect claim constructions.

Issue/Holding:

Did the district court err in its claim constructions underlying the grant of a preliminary injunction? Yes, vacated and remanded.

Discussion:

The Federal Circuit reviewed the constructions of two claim terms: “backplate” and “pin.”

Regarding the term “backplate,” the Federal Circuit rejected both the district court’s construction of this term and Import Global’s proposed construction: it instead adopted its own construction. The error in both the district court’s and Import Global’s constructions was an imposition of a spatial reference requirement with respect to either the frontplate or the wall outlet. The following table illustrates the various constructions litigated in this case.

District Court	The term “backplate” means “the component of the cover, opposing the frontplate, that includes at least one set of electrical prongs.”
Import Global	The “portion of the apparatus closest to the wall outlet when the apparatus is plugged into the wall outlet.”
Federal Circuit	The “component forming the cover with the frontplate, such that the maximum thickness of the cover is the distance, at the central portion of the cover, between the frontplate and the component.”

Regarding the term “pin,” the district court construed this term as a means-plus-function limitation under 35 U.S.C. §112(f). The Federal Circuit found this construction to be erroneous because the term “pin” does not use the word “means,” which creates a presumption that §112(f) does not apply. Further, the “pin” was described in the specification in structural terms. Accordingly, the Federal Circuit held that “pin” should be construed in accordance with its plain and ordinary meaning.

The Federal Circuit vacated the grant of injunctive relief and remanded for further proceedings consistent with its claim construction rulings. It did not reach the issue of irreparable harm on the merits, but noted that any presumption of irreparable harm from a showing of validity and infringement cannot survive *eBay v. MercExchange*, 547 U.S. 388 (2006), extending that rule to the preliminary-injunction context.