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Federal Circuit Reverses Narrow Claim Construction in MPH Technologies v. Apple

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In *MPH Technologies Oy v. Apple Inc.*, No. 2025-1069 (Fed. Cir. Aug. 3, 2026), the Federal Circuit addressed how courts should interpret patent claims when a specification focuses heavily on a preferred technology but the claims use broader language.

The nonprecedential decision involved patents covering secure communications when a mobile device changes network addresses. MPH alleged that Apple's iMessage and FaceTime products infringed its patents. The Federal Circuit vacated a judgment of noninfringement, reversed an indefiniteness ruling, and remanded the case to the district court.

A preferred embodiment did not limit the claims

Apple argued that the claim term "secure" required IPSec, a protocol used for secure IP communications. The patent specification discussed IPSec extensively, and the district court agreed with Apple's proposed construction.

The Federal Circuit reversed. The claims referred broadly to a "secure" connection, not to IPSec. More importantly, the specification stated that the invention was not limited to existing protocols such as IPSec and contemplated other protocols.

That language mattered. A specification can narrow claim scope when it clearly disclaims alternatives, but extensive discussion of one preferred embodiment does not automatically restrict otherwise broad claims.

The court also rejected a construction of "unique identity" that limited the term to an IPSec-specific Security Parameters Index. That limitation depended on the incorrect conclusion that the claims required IPSec.

Claim differentiation supported a broader reading

The patent's dependent claims also helped MPH. One dependent claim specifically required IPSec. If the independent claim already required IPSec, the dependent claim would add little.

Claim differentiation is not conclusive, but it can be persuasive when a proposed construction would make a dependent claim largely redundant.

Imperfect drafting was not indefinite

The Federal Circuit also reversed the district court's ruling that certain claims were indefinite. Apple argued that references to "the secure connection" lacked a clear antecedent basis.

Under the Supreme Court's *Nautilus* standard, claims must inform a person skilled in the art about their scope with reasonable certainty. The standard does not require flawless drafting.

Viewed in context, the claim described a secure connection, a mobile device changing addresses, a gateway updating the connection, and communications continuing through that connection. The court concluded that a skilled artisan could understand the claim scope with reasonable certainty.

Practical patent drafting lessons

This decision offers several useful reminders for patent applicants:

- Avoid calling a preferred embodiment "the invention" or describing features as required, essential, or critical unless that restriction is intended.
- Describe meaningful alternatives to preferred protocols, components, and technical architectures.
- Use specific anti-limitation language when the invention can operate beyond a disclosed example.
- Draft claims and specifications from broad concepts to narrower embodiments.
- Review antecedent basis carefully, even though an imperfect reference will not automatically invalidate a claim.

MPH Technologies v. Apple reinforces a central claim construction principle: the full intrinsic record matters. Broad claim language, express statements preserving alternatives, and dependent claims can prevent a preferred embodiment from becoming an unintended limitation on patent scope.

This article provides general information and does not constitute legal advice.