

January 2006

## Group One Ltd. v. Hallmark Cards, Inc.

Berkeley Technology Law Journal

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### Recommended Citation

Berkeley Technology Law Journal, *Group One Ltd. v. Hallmark Cards, Inc.*, 21 BERKELEY TECH. L.J. 188 (2006).

### Link to publisher version (DOI)

<https://doi.org/10.15779/Z383Q38>

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***GROUP ONE LTD. V. HALLMARK CARDS, INC.****407 F.3d 1297 (Fed. Cir. 2005)*

The Federal Circuit ruled that district courts can only correct typographical errors in a patent if the correction would not be subject to reasonable debate and the prosecution history contains no reason to hold any other interpretation of the patent.

Group One Ltd., as the assignee of a series of patents for the curling and cutting of ribbon, brought suit against Hallmark for infringement of its patents. While some parts of the suit were decided in favor of Hallmark on a motion for summary judgment, the jury ultimately found for Group One, entering a \$8,900,000 verdict. Subsequently, however, the district court, responding to a series of post-verdict motions, found one of Group One's patents invalid for indefiniteness and ruled that it could not correct a printing error that materially altered the patent.

Group One appealed, arguing that the district court should have corrected the printing error. The Federal Circuit affirmed in part the ruling of the district court, holding that the district court could only correct errors that were evident from the face of the document. Other corrections are to be left to the Patent and Trademark Office.