

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
TEXAS, MARSHALL DIVISION

General Access Solutions, Ltd. v. T-Mobile USA, Inc. and Ericsson
Inc.

General Access Solutions · No. 2:23-CV-00158-JRG · Decided March 25, 2026

SUMMARY

The United States District Court for the Eastern District of Texas denied T-Mobile USA, Inc. and Ericsson Inc.’s renewed Rule 50(b) motion for judgment as a matter of law seeking to invalidate asserted patent claims for lack of written description under 35 U.S.C. § 112(a). The court held that the jury had sufficient evidence to find that the patents’ specifications demonstrated possession of claims covering mobile wireless systems and that the verdict was not unsupported by the evidence.

CASE DETAILS

COURT	United States District Court for the Eastern District of Texas, Marshall Division
WRITING FOR THE COURT	Rodney Gilstrap
JURISDICTION	United States District Court for the Eastern District of Texas, Marshall Division
DECIDED	March 25, 2026
DOCKET	2:23-CV-00158-JRG
DISPOSITION	other
PROCEDURAL POSTURE	Defendant T-Mobile USA, Inc. and Intervenor-Defendant Ericsson Inc. filed a renewed motion under Federal Rule of Civil Procedure 50(b) for judgment as a matter of law that the patents asserted at trial were invalid for lack of written description. The motion followed a jury verdict finding none of the asserted claims invalid.
STANDARD OF REVIEW	Judgment as a matter of law is proper when a reasonable jury would not have a legally sufficient evidentiary basis to find for the nonmoving party. The court views the evidence in the light most favorable to the verdict, resolves conflicting evidence in favor of the verdict, refrains from weighing evidence or making credibility determinations, and may set aside the verdict only when the evidence points so overwhelmingly in favor of the moving party that reasonable

	jurors could not reach a contrary conclusion. Invalidity based on lack of written description must be established by clear and convincing evidence.
PRECEDENTIAL VALUE	Unknown; district court memorandum opinion and order with no reported citation identified.
PARTIES	T-Mobile USA, Inc., Ericsson Inc. v. General Access Solutions, Ltd.

TOPICS

patent law intellectual property civil procedure commercial litigation

PRACTICE AREAS

patent law patent validity civil procedure commercial litigation

QUESTIONS PRESENTED

1. Whether claim 3 of the '477 Patent was within the scope of Defendants' renewed Rule 50(b) motion.
2. Whether the evidence required judgment as a matter of law that claims 1 and 6 of the '477 Patent and claim 16 of the '383 Patent were invalid for lack of written description under 35 U.S.C. § 112(a).
3. Whether the jury had sufficient evidence to find that a person of ordinary skill in the art would understand the inventors to have been in possession of the claimed subject matter, including mobile wireless systems.

HOLDINGS

1. Claim 3 was outside the scope of the motion because the fixed-versus-mobile claim-construction dispute concerned only claims 1 and 6 of the '477 Patent and claim 16 of the '383 Patent; any requested relief as to claim 3 was therefore denied.
2. The written-description requirement does not demand a particular form of disclosure or word-for-word recitation of every covered embodiment; the specification must demonstrate that the inventors possessed the claimed invention.
3. Judgment as a matter of law was not warranted because Defendants failed to show by clear and convincing evidence that the trial record pointed so overwhelmingly in their favor that no reasonable jury could find the remaining asserted claims supported by an adequate written description.

KEY QUOTATIONS

“the written description requirement “does not demand any particular form of disclosure.”” (Section III.B)

“Sufficient written description requires that the specification “must demonstrate possession” of the claimed invention, not word-for-word recitations of any and every covered embodiment.” (Section III.B)

“The jury was entitled to weigh the competing testimony of Dr. van der Weide and Dr. Madisetti along with

that of other witnesses discussed in the Parties' briefing." (Section III.B)

FACTUAL BACKGROUND

General Access Solutions asserted two patents concerning wireless communication systems, including claims covering systems that Defendants argued were limited to fixed wireless systems rather than mobile wireless systems. At trial, Defendants presented expert testimony that the patents described only fixed wireless access systems and lacked written-description support for mobile systems. GAS presented testimony that the disclosures were equally applicable to fixed and mobile systems, including testimony concerning cellular base stations and changing channel conditions. The jury found none of the asserted claims invalid.

PROCEDURAL HISTORY

General Access Solutions, Ltd. asserted infringement of claims 1, 3, and 6 of U.S. Patent No. 6,947,477 and claim 16 of U.S. Patent No. 7,099,383. After claim construction and trial, the jury found that none of the asserted claims were invalid for lack of written description. Defendants renewed their Rule 50(b) motion, arguing that the patent specifications did not adequately describe mobile wireless systems. The district court denied the motion.

DISPOSITION

other

CASES CITED

- Abraham v. Alpha Chi Omega, 708 F.3d 614, 620 (5th Cir. 2013)
- TGIP, Inc. v. AT&T Corp., 527 F. Supp. 2d 561, 569 (E.D. Tex. 2007)
- Eli Lilly & Co. v. Aradigm Corp., 376 F.3d 1352, 1363 (Fed. Cir. 2004)
- Core Wireless Licensing S.A.R.L. v. LG Elecs., Inc., 880 F.3d 1356, 1361 (Fed. Cir. 2018)
- Bagby Elevator Co. v. Schindler Elevator Corp., 609 F.3d 768, 773 (5th Cir. 2010)
- Gomez v. St. Jude Med. Daig. Div. Inc., 442 F.3d 919, 937-38 (5th Cir. 2006)
- Ariad Pharms., Inc. v. Eli Lilly & Co., 598 F.3d 1336, 1349, 1352 (Fed. Cir. 2010)
- Reeves v. Sanderson Plumbing Prods., Inc., 530 U.S. 133, 150 (2000)

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