



## On remand, Federal Circuit reaffirms single entity rule for divided, direct infringement

- *Journal of Intellectual Property Law & Practice* (2015) 10 (11): 808-810. doi: 10.1093/jiplp/jpv155

Author(s): Charles R. Macedo, Kyung J. Shin

*Akamai Techs, Inc v Limelight Networks, Inc, 786 F 3d 899 (Fed Cir 2015)*

### Abstract

Following a remand from the US Supreme Court to consider the issue of multiple-actor direct infringement under 35 USC § 271(a), a split panel of the US Court of Appeals for the Federal Circuit continues to require that all of the steps of a method claim be performed by a single actor, either by the actor itself or by others under the actor's 'direction or control.'