

In T.770/90 the board ruled that an **unduly broad claim** not supported by the description as originally filed was not a suitable "reservoir" for amendments.

According to T.1120/05, the original **drawings** cannot be considered as a reservoir of features on which the applicant or a patent proprietor can draw when amending the claims.

In T.296/96 the board stated that, when assessing whether a feature had been disclosed in a document, the relevant question was whether a skilled person would seriously contemplate combining the different features cited in that document. That was not the case in the application as filed.

In T.2363/10 the board held that the selection of features disclosed in six out of one hundred and forty-three bullet points represented a particular selection which was not disclosed as such. The skilled person had **no hint or incentive** to choose exactly such a combination of features. The **general statement** "any such apparatus, means or method has or may have any of the following features" did not change this conclusion, since for a combination of selected elements to form a disclosure, additional information was required which directed the skilled person to this combination.

For a case where the original independent claim was combined with features from a plurality of dependent claims referring back to the independent claim separately ("US style" dependencies), see T.1362/15, summarised below in this chapter II.E.1.6.4.

For further cases concerning an unallowable combination of features see e.g. T.659/97, T.1206/07, T.2044/07.

c) Examples of cases where the combination was held to be allowable

In T.1241/03 the board came to the conclusion that claims to formulations comprising compounds in specific concentrations did not need to have a literal basis in a single passage of the application as originally filed, as long as the exact concentrations and ranges claimed for the specific substances were disclosed as such in the original application. The claims at issue did not refer to a "patchwork" of parameters disclosed in non-connected parts of the description, nor had specific values been isolated from examples in a non-allowable way.

In T.330/05 the board considered that the only feature added to the explicit disclosure, namely the concretisation of the polymer material, did not require any "selection" because each of the polymers listed on pages 14 -16 was clearly and unambiguously disclosed as an **appropriate alternative material**.

In T.2514/16 the board considered whether the two amendments were directly and unambiguously derivable in combination from the original application. In its conclusion, it noted that the two amendments amounted to a limitation of a feature that had already been present in original claim 2, with both features characterising the salt that was necessarily used in the claimed method (contrast with T.1115/14). In these circumstances, the amendments were not to be considered a combination of features from different