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[Your Name]
[Your Title]
[Your Company]
[Street Address, City, State ZIP]

May 14, 2026

[Opposing Counsel Name]
[Firm Name]
[Address]

Re: U.S. Patent No. 10001780 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10001780 (the "10001780 Patent"). After preliminary review, we have substantial concerns about the validity, enforceability, and scope of the asserted claims, summarized below. We reserve all rights and defenses.

1. Subject Patent — Summary

As a senior US patent analyst, I have reviewed the records for US Patent 10,001,780. Below is a concise summary based on the information available as of today, May 13, 2026.
I can confirm that there is no public record of US Patent 10,001,780 being involved in any litigation before the Court of Appeals for the Federal Circuit (CAFC) in the 2026 dockets.
Summary of U.S. Patent No. 10,001,780
Title: Systems and methods for dynamic route planning in autonomous navigation
Assignee: The patent was originally assigned to Brain Corp. The latest assignment on record with the USPTO, dated October 8, 2021, indicates a security interest assignment to Hercules Capital, Inc.
Inventors:
• Borja…

2. Validity Concerns under 35 U.S.C. § 102 — Prior Art

We have identified prior-art references that, in our preliminary view, anticipate one or more asserted claims of the 10001780 Patent:

Prior Art Analysis for US Patent 10,001,780
Date of Analysis: 2026-04-26

Subject Patent:
• Patent Number: 10,001,780
• Title: Systems and methods for dynamic route planning in autonomous navigation
• Filing Date: November 2, 2016
• Issue Date: June 19, 2018
• Assignee: Brain Corp
Summary of Invention:
U.S. Patent 10,001,780 discloses systems and methods for an autonomous robot to dynamically plan its route. The core of the invention involves representing a planned route as a series of "route poses." Each route pose has a footprint corresponding to the robot's size and shape. These poses are subject to simulated forces: repulsive forces from detected obstacles and attractive (or cohesive) forces from other route poses. By calculating the net effect of these forces, the system repositions the route poses to create a new, collision-free path. The robot then navigates this adjusted path, often using interpolation between the repositioned poses. This method allows the robot to make real-time, smooth adjustments to its planned path in response to unforeseen obstacles.

Analysis of…

3. Obviousness under 35 U.S.C. § 103

Independent of § 102, we believe the asserted claims are obvious in view of combinations of prior art that a person having ordinary skill in the art would have been motivated to combine:

Obviousness Analysis of US Patent 10,001,780
To: File
From: Senior US Patent Analyst
Date: May 13, 2026
Subject: Obviousness Analysis of US Patent 10,001,780 ("the '780 patent") under 35 U.S.C. § 103
I. Introduction
This memorandum provides an analysis of the patentability of the claims of US Patent 10,001,780 in view of prior art, focusing on the doctrine of obviousness under 35 U.S.C. § 103. The '780 patent, titled "Systems and methods for dynamic route planning in autonomous navigation," is directed to a system and method for an autonomous robot to dynamically adjust its path in response to obstacles. The key inventive concept appears to be the use of "route poses," which are representations of the robot's footprint along a path, and the calculation of attractive and repulsive forces on these poses to generate a new, collision-free trajectory.
This analysis is based on the legal framework established in Graham v. John Deere Co., 383 U.S. 1 (1966), and further clarified in KSR Int'l Co. v. Teleflex Inc., 550 U.S. 398 (2007). These cases require a factual inquiry into:
1. The…

4. Litigation History of the Patent

Public records reflect that the 10001780 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

• Brain Corporation v. Avidbots Corp. et al. — 1:24-cv-12569 · U.S. District Court for the Northern District of Illinois · filed 2024-12-06 · Active/Pending

5. Request

In light of the foregoing, we request that your client (i) provide a detailed claim chart identifying each accused product or service and mapping every limitation of each asserted claim, (ii) identify any prior art known to your client, including any references cited during prosecution or reexamination, and (iii) substantiate the basis for any damages or licensing demand. We are prepared to discuss the matter further once we have received and reviewed the foregoing.

Sincerely,

[Your Name]