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[Your Name]

[Your Title]

[Your Company]

[Street Address, City, State ZIP]

June 1, 2026

[Opposing Counsel Name]

[Firm Name]

[Address]

Re: U.S. Patent No. 10056902 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10056902 (the "10056902 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

US patent 10056902, titled "On-die termination control," was issued on August 21, 2018, from an application filed on April 28, 2017. The original assignee was Rambus Inc., with the current assignee listed as Signal LLP. The inventors are Kyung Suk Oh and Ian P. Shaeffer.

Abstract:

A memory control component outputs a memory write command to a memory IC and also outputs write data to be received via data inputs of the memory IC. Prior to reception of the write data within the memory IC, the memory control component asserts a termination control signal that causes the memory IC to apply to the data inputs a first on-die termination impedance during reception of the write data followed by a...

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 10056902 Patent:

Most Relevant Prior Art for US Patent 10056902

To identify the most relevant prior art, I will refer to the "Cited by" section of US Patent 10056902 on Google Patents, which lists the patents and other publications that have cited US10056902.

However, the request asks for prior art for 10056902, meaning it is citing prior art. I will therefore

look at the "Prior art citations" section from the patent itself.

Unfortunately, I cannot directly access or "search within" the USPTO database or Google Patents in real-time to list the specific prior art cited by US10056902, as I do not have direct access to that function. The "Prior art keywords" and "Prior art date" sections on the Google Patents page provide high-level information but do not list specific patent numbers and their details. The provided patent text includes a "CROSS REFERENCE TO RELATED APPLICATIONS" section which lists a chain of continuation applications that eventually lead back to U.S. patent application Ser. No. 11/422,022, filed Jun. 2, 2006 (issued as U.S. Pat. No. 7,486,104), but these are not considered "prior..."

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:

To analyze the obviousness of US patent 10056902 under 35 U.S.C. § 103, we need to identify combinations of prior art references that predate the patent's priority date of June 2, 2006, and explain why a person having ordinary skill in the art (PHOSITA) would have been motivated to combine them to arrive at the claimed invention. The independent claims, Claim 1 (integrated circuit device) and Claim 11 (method of control), are the primary focus.

Elements of Independent Claims (Claims 1 and 11)

The core elements of the independent claims revolve around a memory control component (or method of controlling) that interacts with a DRAM and manages its on-die termination (ODT) during write operations. Key features include:

1. Memory Controller/IC Device: An integrated circuit device configured to control a DRAM.
2. Transmission of Commands: Transmitting a write command, a chip-select signal, and one or more commands to store a digital control value in a DRAM register.
3. Programmable Termination Impedance: The digital control value specifies a value of a termination impedance.
- 4....

4. Litigation History of the Patent

Public records reflect that the 10056902 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Untitled case — 7:26-cv-00095 · Texas Western District Court · Active litigation

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]

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