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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. 10123456 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10123456 (the "10123456 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**

Patent Summary: US 10,123,456 B2

A detailed summary of United States Patent 10,123,456 B2 is provided below.

Title: Phase change material heat sink using additive manufacturing and method.

Assignee: Raytheon Company.

Inventors:

- Jeremy T. Evans
- Adam C. Wood
- Chad E. Boyack
- Richard Piekarski

Filing Date: October 28, 2015.

Issue Date: November 6, 2018.

Abstract: A heat sink is provided that includes a lower shell, an upper shell and an internal matrix. The lower shell, the upper shell and the internal matrix are formed as a single component using additive manufacturing techniques. The internal matrix includes a space that is configured to receive a phase change material....

## **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 10123456 Patent:

#### Analysis of Prior Art for U.S. Patent 10,123,456

This report details the most relevant prior art cited during the examination of U.S. Patent 10,123,456, based on a review of the patent's file wrapper and citation list. Each reference is analyzed for its potential to anticipate the claims of the '456 patent under 35 U.S.C. § 102.

The core invention of US 10,123,456 lies in the method of monolithically forming a heat sink with an internal matrix, upper and lower shells, and often as part of a larger structural component, all through additive manufacturing. This technique aims to overcome the limitations of traditional manufacturing, which typically involves brazing separate components, a costly process prone to creating leak paths and failure points.

The following prior art was considered by the USPTO examiner. The references marked with an asterisk (\*) on the face of the patent are those deemed most significant by the examiner.

1. US 7,810,552 B2 - "Method of making a heat exchanger"

• Full Citation: US 7,810,552 B2, "Method of making a heat exchanger," assigned to The Boeing...

### **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 10,123,456 under 35 U.S.C. § 103

This analysis evaluates whether the invention claimed in US Patent 10,123,456 would have been obvious to a Person Having Ordinary Skill in the Art (POSA) at the time the invention was made (around the filing date of October 28, 2015). The analysis is based on combinations of the prior art references identified during the patent's examination.

#### Definition of a Person Having Ordinary Skill in the Art (POSA)

A POSA in the relevant field would be an individual with a degree in mechanical, thermal, or aerospace engineering and several years of experience in the design and manufacturing of thermal management systems for applications such as electronics, avionics, or other high-power density systems. This person would be knowledgeable about various heat sink technologies, including those utilizing phase change materials (PCMs), and would be familiar with conventional manufacturing methods like machining and brazing, as well as the capabilities and benefits of emerging technologies like additive manufacturing (also known...

### **4. 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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