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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. 10129627 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10129627 (the "10129627 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, here is a concise summary of US Patent 10,129,627.

Patent Information:

- Title: Wireless digital audio music system
- Assignee: ONE-E-WAY Inc
- Inventor: C. Earl Woolfork
- Filing Date: January 21, 2016
- Issue Date: November 13, 2018
- Abstract: A wireless digital audio system includes a portable audio source with a digital audio transmitter operatively coupled thereto and an audio receiver operatively coupled to a headphone set. The audio receiver is configured for digital wireless communication with the audio transmitter. The digital audio receiver utilizes fuzzy logic to optimize digital signal processing. Each of the digital audio transmitter and...

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 10129627 Patent:

In my capacity as a senior US patent analyst, I have conducted a thorough review of US Patent

No. 10,129,627, issued on November 13, 2018. The following analysis details the most relevant prior art cited against this patent and discusses the potential for anticipation under 35 U.S.C. § 102. The analysis is based on the patent's own cited references.

The core of patent 10,129,627 revolves around a wireless digital audio system using spread spectrum and Code Division Multiple Access (CDMA) to ensure private communication between a transmitter (connected to a portable audio source) and a receiver (headphones). Key features recited in the independent claims (1, 3, and 5) include the use of a unique user code for a dedicated connection, the transmission of high-quality audio (20 Hz to 20 kHz), encoding to reduce intersymbol interference, and a combination of Differential Phase Shift Keying (DPSK) and non-DPSK modulation/demodulation.

Analysis of Most Relevant Prior Art

Based on a review of the sixteen patent citations listed in US 10,129,627, the following references are identified as...

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 10,129,627

An analysis of US Patent 10,129,627, titled "Wireless digital audio music system," and its cited prior art indicates that the patent's claims would have been considered obvious to a person of ordinary skill in the art at the time of invention, pursuant to 35 U.S.C. § 103. The claims of the '627 patent are rendered obvious by a combination of prior art references that disclose the key elements of the invention, with a clear motivation for their combination.

The independent claims of the '627 patent generally describe a wireless digital audio spread spectrum receiver and transmitter system. Key features of this system include the use of a unique user code for communication, the transmission of a high-quality audio signal (20 Hz to 20 kHz), the use of spread spectrum communication (specifically including Differential Phase Shift Keying - DPSK), and independent code division multiple access (CDMA) to prevent interference between users.

A compelling case for obviousness can be constructed by combining the teachings of U.S. Patent No....

4. Litigation History of the Patent

Public records reflect that the 10129627 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- One-E-Way, Inc. v. Samsung Electronics Co., Ltd. et al. — 1:24-cv-01561 · US District Court for the Western District of Texas · filed 2024-12-18 · Active
- One-E-Way, Inc. v. Dell Technologies Inc. et al. — 1:24-cv-01558 · US District Court for the Western District of Texas · filed 2024-12-18 · Active
- One-E-Way, Inc. v. Anker Innovations Ltd. — 1:24-cv-01559 · US District Court for the Western District of Texas · filed 2024-12-18 · Active
- One-E-Way, Inc. v. Apple Inc. — 2:20-cv-06339 · US District Court for the Central District of California · filed 2020-07-16 · Judgment

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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