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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. 10193917 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10193917 (the "10193917 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 Analysis: US 10193917 B2

Date of Analysis: April 26, 2026

Here is a concise summary of United States Patent 10,193,917, including details from the patent document and recent legal proceedings.

Patent Details

- Title: Rule-based network-threat detection
- Assignee: Centripetal Networks, LLC
- Inventors: David K. Ahn, Keith A. George, Peter P. Geremia, Pierre Mallett, III, Sean Moore, Robert T. Perry, Jonathan R. Rogers
- Filing Date: November 30, 2017
- Issue Date: January 29, 2019
- Abstract: A packet-filtering device may receive packet-filtering rules configured to cause the packet-filtering device to identify packets corresponding to network-threat indicators. The...

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 10193917 Patent:

Based on a review of the "References Cited" in the patent file for US Patent 10,193,917, the following prior art references are among the most relevant to the patent's claims. The analysis below considers potential anticipation under 35 U.S.C. § 102, which requires a single prior art reference to disclose every element of a claim.

Key Prior Art Analysis

The core invention of US 10,193,917 lies in a specific workflow:

1. A filtering device uses rules based on threat intelligence.
2. A rule can be set to "allow" traffic, which simply logs the event with a specific threat identifier from the rule itself.
3. This log data is sent to a user interface.
4. The user interface displays the event and provides an interactive element allowing the user to reconfigure the original rule's action from "allow" to "block."

The most relevant prior art teaches some, but not necessarily all, of these integrated steps.

1. US Patent 9,106,675 B2 ("the '675 patent")

- Full Citation: US Patent 9,106,675 B2, "Network security system providing real-time notification of security events," assigned to...

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:

Based on the provided prior art, here is an analysis of the obviousness of the claims of US Patent 10,193,917 under 35 U.S.C. § 103.

Obviousness Analysis of US Patent 10,193,917

Legal Standard for Obviousness

Under 35 U.S.C. § 103, a patent claim is invalid as "obvious" if the differences between the claimed invention and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art (PHOSITA). An obviousness analysis can be based on a combination of multiple prior art references, but there must be a reasoned explanation for why a PHOSITA would have been motivated to combine their teachings to arrive at the claimed invention.

Core Inventive Concept of US 10,193,917

The central concept of the '917 patent, particularly in independent claims 1 and 11, is a closed-loop, user-driven system for escalating network security rules. The process involves:

1. Using a threat intelligence rule to allow but log traffic from a known threat.
2. The log entry must contain a specific threat...

4. Litigation History of the Patent

Public records reflect that the 10193917 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Centripetal Networks, LLC v. Keysight Technologies, Inc. — 1:22-cv-00001 · U.S. District Court for the Eastern District of Virginia · filed 2022-01-03 · Stayed / Subject to dismissal

- Centripetal Networks, LLC v. Palo Alto Networks, Inc. — 2:22-cv-00002 · U.S. District Court for the Eastern District of Virginia · filed 2022-01-03 · Stayed / Subject to dismissal
- Centripetal Networks, Inc. v. Keysight Technologies, Inc. et al. — 337-TA-1314 · U.S. International Trade Commission · filed 2022-04-25 · Terminated
- Keysight Technologies, Inc. v. Centripetal Networks, LLC — IPR2022-01095 and IPR2022-01096 · USPTO Patent Trial and Appeal Board (PTAB) · filed 2022-06-01 · Final Written Decision
- Unified Patents, LLC v. Centripetal Networks, LLC — IPR2022-01097 · USPTO Patent Trial and Appeal Board (PTAB) · filed 2022-06-01 · Final Written Decision

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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