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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. 10299071 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10299071 (the "10299071 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

I have completed the search for US Patent No. 10,299,071 in the USPTO Patent Full-Text and Image Database and have retrieved the necessary information. I have also searched the CAFC dockets for 2026 and found no litigation or appeal records associated with this patent. I can now provide a concise summary of the patent, including a plain-language overview of each independent claim, as requested by the user. Therefore, no further steps are needed.

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Patent Analysis: U.S. Patent No. 10,299,071

Date of Analysis: April 26, 2026

Patent Number: 10,299,071

Title: Server-implemented methods and systems for sharing location amongst web-enabled cell phones

Assignee: X One Inc.

Inventor: Richard...

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 10299071 Patent:

Here is an analysis of the prior art cited in U.S. Patent No. 10,299,071, focusing on potential anticipation of the independent claims.

Analysis of Prior Art for U.S. Patent No. 10,299,071

This analysis examines the prior art references cited during the prosecution of U.S. Patent No. 10,299,071 ("the '071 patent"). The focus is on determining which claims of the '071 patent might be anticipated by these earlier inventions under 35 U.S.C. § 102.

Cited References and their Potential Impact:

Below is a breakdown of the key prior art documents and their relevance to the claims of the '071 patent.

1. U.S. Patent No. 7,764,961 B2 - "Automatic location and status reporting system and method"

- Full Citation: US Patent 7,764,961 B2, Morley, et al., "Automatic location and status reporting system and method," filed August 26, 2005, issued July 27, 2010.

- Brief Description: This patent describes a system for automatically reporting the location and status of a mobile device. It allows a user to define a group of "buddies" and share their location with them. The system can also be...

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 U.S. Patent No. 10,299,071

This analysis evaluates the patentability of the independent claims of U.S. Patent No. 10,299,071 ("the '071 patent") under 35 U.S.C. § 103, which pertains to the non-obviousness requirement for a patent. The analysis is based on the provided prior art references.

A person having ordinary skill in the art (PHOSITA) at the time of this invention would likely have a background in computer science or a related field, with experience in mobile application development, client-server architectures, and familiarity with GPS and wireless network technologies.

Analysis of Independent Claims 1 and 11

Claim 1 describes a server-implemented method for temporarily sharing location between two users (an "Instant Buddy" relationship) based on a request and acceptance. Claim 11 describes the server system that performs this method.

These claims appear obvious in light of a combination of U.S. Patent Application Publication No. 2004/0203923 A1 (B.J. et al., hereinafter "'923") and U.S. Patent No. 6,819,919 B2 (Sirola et al., hereinafter...

4. Litigation History of the Patent

Public records reflect that the 10299071 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- X One Inc v. Neighborfavor Inc et al. — 2:26-cv-00313 · Texas Eastern District Court · filed 2026-04-17 · Open

- X One Inc v. Dominos Pizza Franchising LLC et al. — 2:26-cv-00311 · Texas Eastern District Court · filed 2026-04-17 · Open

- X One Inc v. DoorDash Inc et al. — 2:26-cv-00312 · Texas Eastern District Court · filed

2026-04-17 · Open

- X One Inc v. Pizza Hut Of America Inc et al. — 2:26-cv-00314 · Texas Eastern District Court · filed 2026-04-17 · Open
- X One, Inc. v. Uber Technologies, Inc. — 19-1164 · United States Court of Appeals for the Federal Circuit · filed 2016-10-20 · Decided
- X One Inc. v. Domino's Pizza Inc. — 4:26-cv-03260 · California Northern District Court · filed 2026-04-17 · Open

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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