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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. 10347248 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10347248 (the "10347248 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

Here is a concise summary of U.S. Patent 10,347,248.

Summary of U.S. Patent 10,347,248

Title: System and method for providing in-vehicle services via a natural language voice user interface

Assignee: The patent has been assigned multiple times. The original assignee was VoiceBox Technologies Corp. Subsequent assignments were made to ORIX GROWTH CAPITAL, LLC, back to VOICEBOX TECHNOLOGIES CORPORATION, then to CERENCE INC., BARCLAYS BANK PLC, CERENCE OPERATING COMPANY, and WELLS FARGO BANK, N.A. As of the latest publicly available information, it was assigned back to CERENCE OPERATING COMPANY.

Inventors: Michael R. Kennewick, Catherine Cheung, Larry Baldwin, Ari Salomon, Michael Tjalve,...

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 10347248 Patent:

Analysis of Prior Art for U.S. Patent 10,347,248

This analysis details the most relevant prior art cited during the examination of U.S. Patent 10,347,248, titled "System and method for providing in-vehicle services via a natural language voice user interface." The core novelty of this patent, as defined by its independent claims (1 and 13), lies in the combination of a vehicle's telematics system, a natural language voice interface, and the use of the vehicle's current geographic location to interpret and respond to a user's spoken request for in-vehicle services. The following cited patents and patent applications are examined for their potential to anticipate these claims under 35 U.S.C. § 102.

Key Cited Prior Art and Potential Anticipation

1. U.S. Patent 7,398,209 B1

- Full Citation: US 7,398,209 B1, "Systems and methods for responding to natural language speech utterance"
- Assignee: VoiceBox Technologies, Inc.
- Publication Date: July 8, 2008 (Filed: May 30, 2003)
- Brief Description: This patent describes a system that processes natural language speech utterances by...

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 10,347,248

An analysis of the independent claims of U.S. Patent 10,347,248 ("the '248 patent") suggests that they would have been obvious to a Person Having Ordinary Skill in the Art (PHOSITA) at the time of the invention, in light of prior art references. The standard for obviousness under 35 U.S.C. § 103 requires determining whether the differences between the claimed invention and the prior art are such that the claimed invention as a whole would have been obvious to a PHOSITA. A PHOSITA in this field circa 2007 would likely be a software or systems engineer with experience in vehicle telematics, navigation systems (including GPS), and voice recognition technology.

The analysis below focuses on independent claims 1 (method) and 13 (system), as the patentability of the dependent claims relies upon them. The core elements of these claims are:

1. A method/system within a vehicle telematics unit.
2. Receiving a natural language spoken request.
3. Determining the vehicle's current location.
4. Determining a response based on that location.
- 5....

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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