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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. 10372793 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10372793 (the "10372793 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**

An analysis of United States Patent 10,372,793 is provided below.

Title: Hyperlink with graphical cue

Assignee: Aloft Media, LLC

Inventors: Gal Arav

Filing Date: January 8, 2019

Issue Date: August 6, 2019

Abstract: The patent describes a system, method, and computer program product for displaying a first set of representations of hyperlinks. Upon receiving a user's selection from this first set, the system displays a second set of hyperlink representations. When the user selects from the second set, the system navigates to the destination specified by that hyperlink.

Plain-Language Overview of Independent Claims

Based on the full patent text, the following claims have been...

## **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 10372793 Patent:

Analysis of Prior Art for U.S. Patent 10,372,793

An examination of the prior art cited on the face of U.S. Patent 10,372,793, "Hyperlink with graphical cue," reveals several key references that the patent examiner considered during prosecution. The most relevant of these are detailed below. This analysis is based on the information available in the patent's file wrapper and public patent databases as of May 12, 2026.

It is crucial to note that the '793 patent is part of a continuation chain, claiming a priority date of March 20, 2006, from U.S. Application No. 11/384,957 (now U.S. Patent 7,529,795). Therefore, any prior art must have a publication date preceding this priority date to be considered for anticipation under 35 U.S.C. § 102.

#### Examiner-Cited Prior Art

The following references were cited by the USPTO examiner during the prosecution of the patent application.

U.S. Patent No. 7,249,326 (Glazer et al.)

- Full Citation: US 7,249,326 B2
- Title: System and method for navigating a network of linked documents
- Filing Date: June 29, 2000
- Issue Date: July 24, 2007
- Brief...

### **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 10,372,793

An analysis of the independent claims of U.S. Patent 10,372,793 in light of the examiner-cited prior art suggests that the claims would have been obvious to a person of ordinary skill in the art (PHOSITA) at the time of the invention, prior to the March 20, 2006 priority date. The claimed invention combines known user interface elements in a predictable way to achieve an expected result. The primary arguments for obviousness under 35 U.S.C. § 103 are constructed by combining the teachings of the cited references.

#### Deconstruction of Independent Claim 1

The core limitations of independent claim 1 can be broken down as follows:

1. Display a first set of textual hyperlink representations (e.g., a text menu of categories).
2. Receive a hover input from a user over one of the textual representations.
3. In response to the hover, display a second, different set of graphical hyperlink representations (e.g., company logos).
4. The graphical representations are pre-downloaded for quick display.
5. Upon user selection (e.g., a click) of one of...

### **4. Litigation History of the Patent**

Public records reflect that the 10372793 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- AF Holdco, LLC v. Aloft, LLC — 3:26-cv-00374 · U.S. District Court for the Middle District of Tennessee · filed 2026-03-29 · Open

- Krueger International Inc v. Aloft Media LLC — 1:26-cv-00425 · U.S. District Court for the Eastern District of Wisconsin · filed 2026-03-17 · Open
- Nouryon USA LLC v. Aloft Media, LLC — 1:26-cv-00193 · U.S. District Court for the District of Delaware · filed 2026-02-23 · Open
- The Morse Group, Inc. v. Aloft Media, LLC — 3:25-cv-50188 · U.S. District Court for the Northern District of Illinois · filed 2025-04-22 · Open
- Horace Mann Insurance Company v. Aloft Media, LLC — 3:25-cv-03262 · U.S. District Court for the Illinois Central District Court · filed 2025-09-05 · Terminated
- Brotherhood Mutual Insurance Company v. Aloft Media, LLC et al. — 1:25-cv-00273 · U.S. District Court for the Northern District of Indiana · filed 2025-06-02 · Terminated
- Schaefer Systems International, Inc. v. Aloft Media, LLC et al. — 3:22-cv-00513 · U.S. District Court for the Western District of North Carolina · filed 2022-09-29 · Terminated

## 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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