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[Your Name]
[Your Title]
[Your Company]
[Street Address, City, State ZIP]

May 25, 2026

[Opposing Counsel Name]
[Firm Name]
[Address]

Re: U.S. Patent No. 10379301B2 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10379301B2 (the "10379301B2 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's a concise summary of US Patent 10379301B2:
US Patent 10379301B2
• Title: Multi-channel parallel optical receiving device
• Assignee: Applied Optoelectronics Inc
• Inventors: Jian-Hong Luo, Dong-Biao JIANG, Peng Nie, Xiao-Liang DING
• Filing Date: 2017-02-14
• Issue Date: 2019-08-13
• Abstract: The patent describes a multi-channel parallel optical receiving device comprising a carrier, a light receiving chip, and a plurality of optoelectronic diodes arranged on a top surface of one end of the carrier, electrically connected to the chip. An optical fiber connector is located at another end of the carrier. An arrayed waveguide grating (AWG) is also on the carrier's top surface, with…

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 10379301B2 Patent:

To identify the most relevant prior art for US patent 10379301B2, we will examine the patent

citations listed within the provided patent text. The priority date of US10379301B2 is 2016-05-23. Therefore, for a patent to be considered anticipatory prior art under 35 U.S.C. § 102, its publication or effective filing date must be prior to this date.
The core inventive aspects of US10379301B2 include:
1. An arrayed waveguide grating (AWG) with a top surface at its output end inclined at a predetermined angle (41-46 degrees, specifically 42 degrees in some claims) to reflect multi-channel optical signals to photosensitive surfaces of an array of optoelectronic diodes.
2. The optoelectronic diodes and the light receiving chip are disposed directly on the same top surface of an end of the carrier.
3. Simplified installation of the AWG using a placement groove or guiding structure, making direct coupling between the AWG and optoelectronic diodes unnecessary.
We will focus on the "Patent Citations" section of US10379301B2 and prioritize those marked with an asterisk (\) as "Cited 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:

To analyze the obviousness of US patent 10379301B2 under 35 U.S.C. § 103, we identify combinations of prior art references that disclose all the elements of the claims and explain the motivation a person having ordinary skill in the art (PHOSITA) would have to combine them.
The key distinguishing feature of US10379301B2, particularly as articulated in independent Claim 1, is the multi-channel parallel optical receiving device that includes an arrayed waveguide grating (AWG) where a top surface of its output end is at a predetermined angle (41 to 46 degrees) to reflect multi-channel optical signals to photosensitive surfaces of a plurality of optoelectronic diodes arranged in parallel on a carrier. The optoelectronic diodes and a light receiving chip are also disposed directly on the same top surface of an end of the carrier and electrically connected via bonding wires.
Combination of Prior Art for Obviousness of Claim 1:
A strong argument for obviousness can be made by combining US9509433B2 with the general knowledge of a PHOSITA in optical engineering regarding light redirection…

4. Litigation History of the Patent

Public records reflect that the 10379301B2 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- CAMBRIDGE INDUSTRIES USA, INC. et al. v. Applied Optoelectronics Inc — IPR2025-00434 · Patent Trial and Appeal Board (PTAB) · filed 2025-01-17 · Not Instituted - Merits
- Untitled case — 5:24-cv-01010 · California Northern District Court · Active

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]