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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. 10403051 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10403051 (the "10403051 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 Analyst Report: US 10403051 B2

Date of Analysis: May 4, 2026

Patent Number: US 10403051 B2 (Interpreted literally as US 10,403,051)

Patent Summary

- Title: Interference based augmented reality hosting platforms
- Assignee: Nant Holdings IP LLC
- Inventor: Patrick Soon-Shiong
- Filing Date: November 9, 2018
- Issue Date: September 3, 2019
- Abstract: Interference-based augmented reality hosting platforms are presented. Hosting platforms can include networking nodes capable of analyzing a digital representation of scene to derive interference among elements of the scene. The hosting platform utilizes the interference to adjust the presence of augmented reality objects within an...

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 10403051 Patent:

Analysis of Prior Art Cited in US Patent 10,403,051

This analysis details the prior art references cited during the prosecution of US Patent 10,403,051. Each reference is examined for its potential to anticipate the independent claims (1 and 14) of the '051 patent under 35 U.S.C. § 102. The core inventive concept of the '051 patent is the use of a derived "interference" (constructive or destructive) among real and virtual scene elements to determine the presence and characteristics of AR objects.

1. US Patent Application Publication 2010/0257252 A1 (Dougherty et al.)

- Full Citation: US 2010/0257252 A1, "Augmented Reality Cloud Computing," filed by Dougherty et al. on April 1, 2009.

- Brief Description: Dougherty discloses a system where an AR device captures data about its surroundings and sends it to a cloud computing platform. The platform analyzes the data to determine a context and provides relevant "overlay information" back to the device. This system uses context (e.g., location, time, user identity) to filter and select AR content.

- Anticipation Analysis:

Relation...

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 US 10,403,051 under 35 U.S.C. § 103

This analysis evaluates whether the invention claimed in US Patent 10,403,051 would have been obvious to a Person Having Ordinary Skill in the Art (PHOSITA) at the time of the invention's earliest priority date, April 8, 2011.

A PHOSITA in this context would be an individual with a degree in computer science or a related field and practical experience in computer vision, mobile application development, and the principles of augmented reality systems.

The central inventive concept of US 10,403,051 is the use of "interference" among elements in a scene to determine the presence, enhancement, or suppression of augmented reality (AR) objects. The patent argues that prior art focused on context-based filtering but failed to appreciate this interplay. However, an analysis of the prior art cited within the patent itself suggests that this concept is an obvious extension of existing techniques.

Analysis of Independent Claim 1

Claim 1 describes a method for an AR hosting platform to:

1. Obtain a digital representation of a...

4. Litigation History of the Patent

Public records reflect that the 10403051 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- NantWorks, LLC et al. v. Niantic, Inc. — 3:20-cv-06262 · U.S. District Court for the Northern District of California · filed 2020-09-03 · Judgment

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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