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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. 10419805 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10419805 (the "10419805 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 US Patent 10,419,805 is provided below. This information is based on the patent document and available public records as of the current date.

Patent Information

- Title: Data service
- Assignee: The patent was originally assigned to Flextronics AP LLC. As of January 18, 2023, the current assignee is Multimedia Technologies Pte Ltd.
- Inventors: Mikhail Shoykher, John S. Visosky, Sanjiv Sirpal
- Filing Date: November 2, 2017
- Issue Date: September 17, 2019
- Abstract: The patent describes a method and system for providing content on an "Intelligent TV." An internal content provider module is loaded in response to a user action or a scheduled event. This module communicates...

## **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 10419805 Patent:

Analysis of Prior Art Cited in U.S. Patent No. 10,419,805

As a technical patent analyst, I have examined the prior art references cited during the prosecution of U.S. Patent No. 10,419,805. This analysis is based on the information contained within the patent's file wrapper and the content of the cited documents.

The following documents were cited by the patent examiner as relevant prior art.

U.S. Patent Documents

- U.S. Patent No. 9,456,247 B2

Title: System and Method for Presenting Programming Content on a Television

Publication Date: September 27, 2016

Filing Date: June 14, 2012

Brief Description: This patent describes a system for a television that includes a processor and memory. The system can receive broadcast content and also access applications that provide on-demand content from various sources. It features a user interface that can display a "what's on now" screen showing currently available broadcast content and a "dashboard" that provides access to different content sources and applications. The system can learn user preferences and make recommendations....

### **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. 10,419,805 under 35 U.S.C. § 103

This analysis assesses the obviousness of the independent claims of U.S. Patent No.

10,419,805 ("the '805 patent") in light of the prior art cited during its prosecution. The standard for obviousness under 35 U.S.C. § 103 is whether the differences between the claimed invention and the prior art are such that the claimed invention as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art (PHOSITA). A PHOSITA in this field would likely be a software engineer or system architect with experience in developing applications for televisions, set-top boxes, and digital media devices, possessing knowledge of common software architecture patterns, data aggregation, and user interface design.

The core of the invention claimed in the '805 patent is a specific software architecture for an "Intelligent TV" that uses an "internal content provider module" to orchestrate data retrieval from multiple sources via "subservices" and "source plug-ins." This structure aims...

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

Public records reflect that the 10419805 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Multimedia Technologies Pte Ltd v. LG Electronics Inc — 26-1705 · Court of Appeals for the Federal Circuit · filed 2026-04-21 · Open
- Multimedia Technologies Pte Ltd. v. Fandango Media, LLC — 2:22-cv-00494 · U.S. District Court for the Eastern District of Texas · filed 2022-12-21 · active and pending
- Multimedia Technologies Pte Ltd. v. Tubi, Inc. — 2:23-cv-00124 · U.S. District Court for the Eastern District of Texas · filed 2023-03-20 · active and pending
- Multimedia Technologies Pte Ltd. v. [Defendant Not Available] — 2:25-cv-00577 · U.S. District Court for the Central District of California · Filed

## 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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