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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. 10430015 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10430015 (the "10430015 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

Analysis of U.S. Patent 10,430,015

Date of Analysis: April 26, 2026

This report provides a summary of United States Patent 10,430,015, including its bibliographic information and a plain-language explanation of its independent claims.

Title: Image analysis

Assignee: International Business Machines Corporation (IBM)

Inventors: Sandeep R. Patil, Sarbajit K. Rakshit

Filing Date: August 9, 2013

Issue Date: October 1, 2019

Abstract:

Mechanisms for displaying an ordered sequence of images are provided. The mechanisms receive a search query as input from a user. The search query includes a start point and an end point of a virtual tour. The start point and the end point determine a...

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 10430015 Patent:

Analysis of Prior Art for US Patent 10,430,015

This section analyzes the prior art references cited by the USPTO examiner during the prosecution of US Patent 10,430,015. The analysis focuses on determining the relevance of each reference and whether it potentially anticipates the independent claims of the '015 patent under 35 U.S.C. § 102. For a reference to anticipate a claim, it must disclose, either expressly or inherently, every limitation of that claim. The focus here is on independent claim 1, as claims 9 and 15 are substantially similar in scope for system and computer program product embodiments, respectively.

Key Elements of Claim 1, US 10,430,015:

1. Search Query: Receiving a query with a start point and an end point for a virtual tour.
2. Boundary: The start and end points define a boundary for the tour.
3. Image Collection: Collecting a non-ordered set of images from different users/sources that fall within the boundary.
4. Subset Selection: Selecting a subset from the collected images based on user-specified image density criteria and filter criteria. The subset must...

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:

An obviousness analysis under 35 U.S.C. § 103 for U.S. Patent 10,430,015 requires assessing whether the differences between the claimed invention and the prior art would have been obvious to a Person Having Ordinary Skill in the Art (PHOSITA) at the time the invention was made. For this technology, a PHOSITA would be a computer scientist or software engineer with experience in image processing, database management, and information retrieval systems, particularly concerning geographic and web-based data.

The core elements of the independent claims (1, 9, and 15) are:

1. A search query with a start and end point for a "virtual tour."
2. Collecting images from different users/sources within the tour's spatial boundary into a non-ordered collection.
3. Selecting a subset of these images based on user-specified criteria, including "image density" (e.g., images per unit of time/distance) and other filters.
4. Ordering the subset based on spatial and/or temporal metadata to create a sequence.
5. Displaying the ordered sequence to the user.

Several combinations of the prior art cited in...

4. Litigation History of the Patent

Public records reflect that the 10430015 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- BOE Technology Group Co Ltd v. Samsung Display Co Ltd — IPR2025-01480 · United States Patent and Trademark Office, Patent Trial and Appeal Board · filed 2025-09-15 · settled

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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