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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. 10444943 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10444943 (the "10444943 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**

US Patent 10444943, titled "Interactive electronically presented map," was issued to Activemap LLC on October 15, 2019, from an application filed on February 10, 2017. The inventors listed are Michael Abramson, Erika Jakubassa, Michael Grisham, and Geoff Atkin.

Abstract:

The patent describes computerized systems and methods for providing an electronically presented interactive area representation, such as a map, along with associated information. A user can select text, imagery, or other information on the map linked to specific items or locations. This selection triggers the presentation of related information, such as contact details or a hyperlink to a website. Conversely, a user can...

## **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 10444943 Patent:

To identify the most relevant prior art for US patent 10444943, I will search the USPTO database for the patent and then examine its cited references.

USPTO Search for US Patent 10444943

A search of the USPTO database confirms that US Patent 10444943, titled "Interactive

electronically presented map," was granted on October 15, 2019, to Activemap LLC. The abstract aligns with the previous summary, detailing computerized systems and methods for interactive electronic map presentation with associated information, a magnifier feature, and animated images.

#### Prior Art References and Potential Anticipation

The patent document for US10444943 lists the following prior art. I will analyze these in detail.

U.S. Patent No. 4,974,170

- Full Citation: U.S. Pat. No. 4,974,170, "Vehicle navigation system having map display with position indicator," issued to O'Sullivan et al.
- Publication/Filing Date: The patent was granted on December 4, 1990. The filing date is November 17, 1987.
- Brief Description: This patent describes a vehicle navigation system that displays a map with a current...

### **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 Patent 10444943 Under 35 U.S.C. § 103

The independent claims of US Patent 10444943 relate to an interactive electronically presented map system featuring an unmagnified view, a smoothly movable highlighted portion, a corresponding smoothly updating magnified view, and two-way interactivity between map locations and associated information. A person having ordinary skill in the art (PHOSITA) in 2001 (the priority date of April 30, 2001) would have found the claimed invention obvious through combinations of existing prior art references and common general knowledge.

#### Identified Prior Art References:

The patent itself identifies several relevant prior art references in its background section and description:

1. Online Interactive Map Services: Websites such as MapQuest.com, www.mapsonus.com, www.maps.expedia.com, www.maps.yahoo.com, www.maps.com, www.maps.excite.com, www.mapblast.com, and www.zip2.com.
2. US Pat. No. 6,148,260: An "Interactive network directory service with integrated maps and directions" (filed 1999, granted 2000), which integrates a...

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

Public records reflect that the 10444943 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Activemap LLC v. [Defendant Not Specified] — 2:26-cv-00167 · Texas Eastern District Court · Active litigation

### **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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