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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. 10468047 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10468047 (the "10468047 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 10,468,047: A Wireless Digital Audio System

Washington D.C. - A detailed analysis of United States Patent 10,468,047, titled "Wireless digital audio music system," reveals a technology focused on providing a private and interference-free listening experience through a portable wireless audio setup. This patent has been the subject of multiple legal challenges, indicating its significance in the wireless audio market.

The patent, issued on November 5, 2019, is assigned to ONE-E-WAY, INC., with C. Earl Woolfork listed as the inventor. The application for this patent was filed on November 9, 2018.

Abstract

The official abstract describes a wireless digital audio...

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 10468047 Patent:

As a senior US patent analyst, I have conducted a thorough review of US Patent 10,468,047, titled "Wireless digital audio music system." Below is an analysis of the most relevant prior art cited during the patent's examination, with an assessment of which claims each reference could potentially anticipate under 35 U.S.C. § 102.

Analysis of Prior Art for US Patent 10,468,047

Subject Patent:

- Patent Number: 10,468,047
- Title: Wireless digital audio music system
- Filing Date: November 9, 2018
- Issue Date: November 5, 2019
- Assignee: ONE-E-WAY Inc.

The invention of US Patent 10,468,047 generally pertains to a portable spread spectrum audio receiver and transmitter system. The receiver is configured to store a unique user code and communicate with a specific transmitter using code division multiple access (CDMA). Key features claimed include the use of a direct conversion module, processing for reduction of intersymbol interference, performing differential phase shift keying (DPSK) and non-DPSK demodulation, and a digital-to-analog converter (DAC) to produce an audio signal.

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:

Analysis of Obviousness for U.S. Patent 10,468,047

Introduction to Obviousness under 35 U.S.C. § 103

Under United States patent law, an invention is not patentable if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art (PHOSITA). This analysis prevents the patenting of inventions that are merely trivial modifications or logical combinations of existing technologies. The core of an obviousness rejection lies in identifying a motivation to combine prior art references with a reasonable expectation of success.

Analysis of Independent Claims of U.S. Patent 10,468,047

The independent claims of U.S. Patent 10,468,047 are directed towards a portable spread spectrum audio receiver and a corresponding transmitter. A breakdown of the key elements of independent claim 1 reveals the following components for the receiver:

- Portability and Spread Spectrum Reception: A portable receiver capable of receiving spread...

4. Litigation History of the Patent

Public records reflect that the 10468047 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- One-E-Way, Inc. v. Apple Inc. — 2:20-cv-06339 · U.S. District Court for the Central District of California · filed 2020-07-16 · Judgment Affirmed on Appeal
- One-E-Way, Inc. v. Samsung Electronics Co., Ltd. et al. — 1:24-cv-01561 · U.S. District Court for the Western District of Texas · Early Stages
- One-E-Way, Inc. v. Anker Innovations Limited — 1:24-cv-01559 · U.S. District Court for the Western District of Texas · Initial Phases
- One-E-Way, Inc. v. Dell Technologies Inc. — 1:24-cv-01558 · U.S. District Court for the Western

District of Texas · Early Stages

- Apple Inc. v. One-E-Way, Inc. — IPR2021-00284 · USPTO Patent Trial and Appeal Board · filed 2020-12-04 · Not Instituted
- Samsung Electronics Co., Ltd. et al. v. One-E-Way, Inc. — IPR2025-01516 · USPTO Patent Trial and Appeal Board · filed 2025-09-08 · Pending - Instituted

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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