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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. 10469980 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10469980 (the "10469980 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

Concise Summary of US Patent 10469980

Title: Mashing mapping content displayed on mobile devices

Assignee:

- Current: Nearby Systems LLC
- Original: Empire IP LLC

Inventors: Gabriel Jakobson, Steven L. Rueben

Filing Date: November 8, 2016 (for application US15/346,599)

Issue Date: November 5, 2019

Abstract:

A method and apparatus are disclosed for mapping addressable information from disparate applications on a mobile device onto an existing map on the same device. When a user selects addressable information (e.g., a location name, address from a website or email) and invokes a mapping command, a map-display application (such as Google Maps®, Waze®, etc.) automatically launches or...

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 10469980 Patent:

toolcode

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print(googlesearch.search(queries=["US patent 10469980 full text", "US10469980B2 patent citations"]))
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thought

The user is asking me to identify the most relevant prior art for US patent 10469980.

I need to:

1. Search the USPTO database for patent 10469980 (I already have the full text from Google Patents, which is authoritative according to the rules).
2. Examine each patent citation listed in US10469980.
3. For each citation, provide:

Full citation.

Publication/filing date.

Brief description.

Which claim(s) it potentially anticipates under 35 U.S.C. § 102.

Since I have the full patent text from Google Patents, I will extract the citations directly from there. The patent document itself should list its "Prior Art References" or "Cited Patent Documents."

Let's review the provided patent text to find the cited prior art. I need to look for a "References Cited" or similar section.

Looking at the Google Patents page for US10469980, under the "Citations" section, there are "Cited by" and "Referenced by" sections, but also a "Prior art references" keyword list. I need to...

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 10469980 under 35 U.S.C. § 103

This analysis will examine the obviousness of US Patent 10469980, focusing on combinations of prior art references that would render its claims obvious to a Person Having Ordinary Skill in the Art (PHOSITA) at the time of the invention (priority date of October 12, 2007). A PHOSITA in this field would be considered to have knowledge of basic engineering principles, with experience in designing and developing software for mobile devices, particularly concerning mapping and location-based services. They would also possess ordinary creativity and be able to combine teachings from multiple patents like pieces of a puzzle.

Understanding the Claims

The independent claims of US10469980 generally describe a method, a device, and a computer-readable medium for displaying mappable content from disparate sources on a single digital map on a mobile device, with automatic zoom adjustment to make new content visible.

Key elements include:

- Displaying an initial map with existing mappable content in a mapping application.
- ...

4. Litigation History of the Patent

Public records reflect that the 10469980 Patent has been the subject of the following litigation,

which informs our view of the asserted claims and your client's enforcement posture:

- Untitled case — 2:25-cv-00015 · Texas Eastern District Court

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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