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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. 10510341 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10510341 (the "10510341 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

Patent Analysis: US 10510341 B1

Date of Analysis: April 26, 2026

Summary

This report provides a concise analysis of United States Patent 10,510,341 B1. The patent describes a "System and method for a cooperative conversational voice user interface." Essentially, it details a technology for a more natural and human-like voice assistant that can understand and respond to complex, and even imperfect, spoken commands.

Title: System and method for a cooperative conversational voice user interface

Assignee: VB Assets LLC

Inventors: Larry Baldwin, Tom Freeman, Michael Tjalve, Blane Ebersold, Chris Weider

Filing Date: August 29, 2019

Issue Date: December 17, 2019

Abstract:

"A cooperative...

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 10510341 Patent:

Prior Art Analysis for US Patent 10,510,341

This analysis covers the prior art references cited by the USPTO examiner during the prosecution of US patent 10,510,341. The focus is on whether any single reference anticipates the independent claims (1, 12, and 19) under 35 U.S.C. § 102, which requires that every element of the claim be present in that single reference.

The core invention of US 10,510,341 revolves around a method for a conversational interface that:

- Builds multiple hypotheses about a user's intent from an utterance.
- Uses both short-term knowledge (from the current conversational session) and long-term knowledge (user-centric history, preferences) to inform these hypotheses.
- Assigns a degree of certainty (e.g., "sure," "not sure") to each hypothesis.
- Generates an adaptive response based on the certainty level, which may involve asking clarifying questions.
- Frames the response to guide the user toward an utterance that is easier for the system to recognize.

Analysis of Cited References

Based on the patent's file history, the following patents were cited...

4. Litigation History of the Patent

Public records reflect that the 10510341 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- VB Assets LLC v. Android International Inc et al. — 1:26-cv-00443 · Delaware District Court · filed 2026-04-17 · Open
- VB Assets, LLC v. General Motors Holdings LLC — 2:25-cv-00621 · U.S. District Court for the Eastern District of Texas · Active
- VB Assets, LLC v. Amazon.com, Inc. — 1:24-cv-01368 · U.S. District Court for the District of Delaware · Active
- VB Assets, LLC v. Ford Motor Company — 2:24-cv-00828 · U.S. District Court for the Eastern District of Texas · Active

4. 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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