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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. 10516270 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10516270 (the "10516270 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 10516270, titled "Method and apparatus for coordination of generators in droop controlled microgrids using hysteresis," was issued to Enphase Energy Inc. on December 24, 2019, from an application filed on January 4, 2017. The inventors listed are Donald Richard Zimmanck, Martin Fornage, Michael J. Harrison, and Christopher Rowe.

Abstract:

The patent describes a method and apparatus for autonomously operating a power generator within a microgrid. The core of the invention involves measuring a grid parameter (such as frequency) on a microgrid transmission line. If this measurement falls below a predefined "turn-on threshold," the power generator initiates power generation. After...

## **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 10516270 Patent:

The initial search results confirm how to use the USPTO search and general information about patent searching. I need to specifically look at the cited patents within the text of US10516270. The text lists "Patent Citations (6)" and "Family Cites Families (9)". I should focus on "Patent Citations" first, as these are the direct prior art cited by the examiner.

Here are the patent citations listed in US10516270B2:

1. US20090063065A1
2. US20100085035A1
3. US20100138070A1
4. US20120313593A1
5. US20140097683A1
6. US20140183961A1

I will now retrieve details for each of these patents and analyze them against the claims of US10516270. To identify the most relevant prior art for US patent 10516270, I will examine each patent cited within its "Patent Citations" section. For each cited reference, I will provide the full citation, publication/filing date, a brief description, and discuss which claims of US10516270 it potentially anticipates under 35 U.S.C. § 102.

The independent claims of US10516270 describe a method (Claim 1), an apparatus (Claim 7), and a non-transitory computer readable...

### **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 under 35 U.S.C. § 103 for US Patent 10516270

This analysis considers whether the claimed invention in US Patent 10516270 would have been obvious to a person having ordinary skill in the art (PHOSITA) at the time of the invention (i.e., before the priority date of January 6, 2016), based on combinations of prior art references. The patent's core innovation lies in applying hysteresis to the turn-on and shut-down thresholds of a microgrid power generator to prevent oscillatory behavior, where the shut-down threshold is greater than the turn-on threshold by an amount exceeding the expected frequency jump caused by the generator's minimum operating power.

Elements of Independent Claims (1, 7, and 15)

The independent claims (method Claim 1, apparatus Claim 7, and non-transitory computer readable medium Claim 15) share the following core steps/features:

1. Obtaining a first measurement of at least one grid parameter (e.g., frequency) of a microgrid transmission line coupled to a power generator.
2. Comparing the first measurement to a turn-on threshold.
- 3....

### **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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