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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. 10516270B2 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10516270B2 (the "10516270B2 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 10516270B2, titled "Method and apparatus for coordination of generators in droop controlled microgrids using hysteresis," was filed on January 4, 2017, and issued on December 24, 2019. [cite: The full patent text confirms the filing date and publication date] The current assignee is Enphase Energy Inc. [cite: The full patent text indicates Enphase Energy Inc. as the Current Assignee and Original Assignee] The inventors are Donald Richard Zimmanck, Martin Fornage, Michael J. Harrison, and Christopher Rowe. [cite: The full patent text lists the inventors]

Abstract:

The patent describes a method and apparatus for autonomously operating a microgrid power generator. This involves...

## **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 10516270B2 Patent:

The prior art for US patent 10516270B2 primarily includes other U.S. patents and patent applications, as well as non-patent literature, that were considered by the patent examiner during prosecution. The full patent text lists both "Patent Citations" and "Non-Patent Citations". Here's an analysis of the most relevant prior art cited in US10516270B2, focusing on the patent

citations, as these are typically the most direct in assessing anticipation under 35 U.S.C. § 102:  
Patent Citations:

1. US20100085035A1

Full Citation: US20100085035A1 - Method and apparatus for determining AC voltage waveform anomalies [cite: The full patent text, under "Patent Citations", provides this citation]

Publication Date: April 8, 2010 [cite: The full patent text, under "Patent Citations", lists the publication date for US20100085035A1 as 2010-04-08]

Priority Date: October 8, 2008 [cite: The full patent text, under "Patent Citations", lists the priority date for US20100085035A1 as 2008-10-08]

Brief Description: This patent application describes methods and apparatus for detecting anomalies in AC...

### **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:

Under 35 U.S.C. § 103, an invention is considered obvious if the differences between the claimed invention 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 (POSITA). The US Patent 10516270B2 addresses a specific problem of oscillatory behavior in fuel-based microgrid generators operating under droop control. The solution proposed is a hysteretic droop curve for the generator, where the shut-down frequency is higher than the turn-on frequency, with the difference being greater than the expected frequency jump resulting from the generator's minimum operating power.

Obviousness Analysis

The independent claims (1, 7, and 15) of US10516270B2 describe a method, apparatus, and non-transitory computer readable medium for autonomously operating a microgrid power generator. The core features include:

1. Obtaining a measurement of a grid parameter (e.g., frequency).
2. Comparing the measurement to a turn-on threshold and initiating power generation if below the 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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