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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. 10539851 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10539851 (the "10539851 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 10,539,851, titled "Method for changing states of electrochromic film," was issued to Lannray Optoelectronics Zhenjiang Co Ltd, with inventors Jian Wang and Yan Zhou. The patent was filed on March 6, 2018, and issued on January 21, 2020. Its priority date is also March 6, 2018.

Abstract:

The patent describes a method for changing the optical state of an electrochromic film, which has multiple optical states. The method involves selecting a desired optical state, injecting or extracting electric charges into or from the film, monitoring the amount of injected or extracted charges, and stopping the charge transfer when the pre-set amount corresponding to the desired state is...

## **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 10539851 Patent:

I am unable to retrieve the abstracts and detailed descriptions for the cited prior art patents using the available search tools. Therefore, I cannot provide a brief description for each reference or assess which claims of US10539851 they potentially anticipate under 35 U.S.C. §

102.

However, I can list the patent citations as provided in US Patent 10,539,851:

Most Relevant Prior Art (Based on available information for US10539851):

1. US5138481A

Full Citation: US5138481A - Electrochromic device with color gradient and method of making the device

Publication Date: 1992-08-11

Priority Date: 1991-07-23

Assignee: Ford Motor Company

Brief Description: Cannot be retrieved with current tools.

Potential Anticipation (35 U.S.C. § 102): Cannot be assessed without a brief description.

2. US5365365A

Full Citation: US5365365A - Electrochromic system with measurement of charge to be transferred

Publication Date: 1994-11-15

Priority Date: 1992-04-30

Assignee: Saint Gobain Vitrage International

Brief Description: Cannot be retrieved with current tools. However, based on the title...

### **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:

I am unable to provide a comprehensive obviousness analysis under 35 U.S.C. § 103 because I lack the detailed descriptions and full teachings of the cited prior art patents (US5138481A, US5365365A, US20040150867A1, US20160202590A1, US20170298682A1) [cite: "I am unable to retrieve the abstracts and detailed descriptions for the cited prior art patents using the available search tools. Therefore, I cannot provide a brief description for each reference or assess which claims of US10539851 they potentially anticipate under 35 U.S.C. § 102."]. A proper obviousness analysis requires an understanding of what each prior art reference teaches, so that one can determine:

1. What claims or elements of US 10,539,851 are present in the prior art.
2. Why a person having ordinary skill in the art (PHOSITA) would have been motivated to combine specific references.
3. How such a combination would render the claims of US 10,539,851 obvious, providing a reasonable expectation of success.

While the titles of some references, such as "Electrochromic system with measurement of charge to be transferred"...

### **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]

**DISCLAIMER.** This document is a machine-generated sample. The factual assertions, prior-art citations, and legal arguments above are AI-produced and may contain errors, omissions, or outdated information. Do not transmit this letter, in whole or in part, to any party. This is not legal advice; no attorney-client relationship is created by its existence. Consult a licensed patent attorney before responding to any patent-infringement assertion.

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