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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. 10609904 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10609904 (the "10609904 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

Summary of U.S. Patent 10,609,904

Title: Lure chasing system

Assignee: Swift Paws Inc

Inventors: Meghan Wolfgram, John Ritter

Filing Date: December 14, 2014

Issue Date: April 7, 2020

Abstract:

A lure chasing system comprises: a motorized pulley unit disposed at a first location, the motorized pulley unit including a drive housing enclosing a motor and a drive pulley connected to the motor; a transfer pulley unit disposed at a second location, the transfer pulley unit including a transfer housing enclosing a transfer pulley; a lure line engaging the drive pulley and the transfer pulley so as to form a loop configuration for the lure line; and a lure attached to the lure line.

Overview...

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 U.S. Patent 10,609,904

This analysis examines the claims of U.S. Patent 10,609,904 ('904 patent) for obviousness under 35 U.S.C. § 103, based on prior art available before the priority date of December 17, 2013. The analysis concludes that the independent claims of the '904 patent would have been obvious to a Person Having Ordinary Skill in the Art (PHOSITA).

A PHOSITA in the field of animal exercise or moving target devices would have a background in mechanical engineering or product design, with knowledge of motors, pulley systems, and common manufacturing techniques for plastic housings.

Primary Prior Art Reference

US 7,614,626 B1 to Aanerud (Aanerud), titled "Moving target system," is selected as the primary prior art reference. Published on November 10, 2009, Aanerud discloses a system remarkably similar to the one claimed in the '904 patent. Specifically, Aanerud teaches:

- A motorized drive unit and a separate idler unit (Claim 1: "motorized pulley unit" and "transfer pulley unit").
- A housing that "substantially encloses" the motor and the drive...

4. Litigation History of the Patent

Public records reflect that the 10609904 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Zhende Tech et al. v. Swift Paws Inc — 26-1709 · Court of Appeals for the Federal Circuit · filed 2026-04-21 · Open
- Swift Paws, Inc. v. Tuff Pupper LLC et al. — 3:24-cv-00838 · U.S. District Court for the Middle District of Tennessee · filed 2024-07-11 · Active
- Swift Paws, Inc. v. Zhende Tech — 6:26-cv-00259 · U.S. District Court for the Middle District of Florida · On appeal

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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