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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. 10614477 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10614477 (the "10614477 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 10,614,477

Date of Analysis: April 26, 2026

Here is a concise summary of US patent 10,614,477, including its key details and a plain-language overview of its independent claims.

Patent Information

- Title: Subscription bill service, systems and methods
- Assignee: Nant Holdings IP, LLC
- Inventor: Patrick Soon-Shiong
- Filing Date: May 24, 2019
- Issue Date: April 7, 2020
- Abstract: A number of sets of methods, systems, and apparatuses applicable to transactions are disclosed. One set includes transaction systems configured to reconcile a transaction among multiple provider accounts or user accounts via derived object attributes and reconciliation matrices. Another...

## 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 10614477 Patent:

## Analysis of Prior Art for U.S. Patent 10,614,477

As a senior US patent analyst, a thorough review of the prior art cited during the prosecution of U.S. Patent No. 10,614,477, titled "Subscription bill service, systems and methods," has been conducted. The following analysis details the most relevant cited references and their potential impact on the patent's claims under 35 U.S.C. § 102 for anticipation.

The invention claimed in US Patent 10,614,477 generally relates to a transaction system that utilizes a recognition engine to derive attributes of a real-world object from a digital representation. These attributes are then used by a transaction engine, with one or more reconciliation matrices, to reconcile a transaction among multiple provider or user accounts.

Key Independent Claims of US 10,614,477:

- Claim 1: A method of reconciling payment of a coupon, comprising: recognizing, by a recognition engine, a real-world object related to a purchasable item; creating a virtual coupon based on attributes derived from a digital representation of the real-world object; activating the...

### 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 No. 10,614,477 under 35 U.S.C. § 103

This analysis examines the obviousness of the claims of U.S. Patent No. 10,614,477 ("the '477 patent") in light of prior art available before its earliest priority date of November 21, 2011. 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 core of the '477 patent's claims involves a three-part system:

1. An object recognition engine that captures a digital representation of a real-world object and derives attributes from it.
2. A transaction reconciliation engine that reconciles a transaction among multiple accounts based on the derived attributes, often using a "reconciliation matrix."
3. An engagement engine that causes a computing device to take an action based on the transaction.

A key aspect is the ability to split a single transaction (e.g., a payment, coupon redemption, or loyalty point...

### 4. Litigation History of the Patent

Public records reflect that the 10614477 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- NantWorks, LLC et al. v. Niantic, Inc. — 3:20-cv-06262 · U.S. District Court for the Northern District of California · filed 2020-09-03 · Judgment

### 5. 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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