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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. 10651866 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10651866 (the "10651866 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

Analysis of U.S. Patent 10,651,866

Washington, D.C. – May 1, 2026 – A technical analysis of United States Patent 10,651,866, titled "Beamforming using fractional time delay in digitally oversampled sensor systems, apparatuses, and methods," has been conducted. This patent details a method for improving the accuracy of signal processing, particularly for applications like beamforming in audio systems.

Key Patent Details:

- Title: Beamforming using fractional time delay in digitally oversampled sensor systems, apparatuses, and methods
- Assignee: Solos Technology Ltd.
- Inventors: Dashen Fan, Joseph Yong Kwon
- Filing Date: April 30, 2019
- Issue Date: May 12, 2020
- Abstract: The patent...

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 10651866 Patent:

Prior Art Analysis for U.S. Patent 10,651,866

An analysis of the prior art cited during the prosecution of U.S. Patent 10,651,866 reveals several key patents and applications that describe related technologies. The core of the '866 patent is the application of a fractional time delay to a digitally oversampled signal from a sensor before the signal is decimated to its baseband rate. This technique allows for very fine time-delay resolution, which is particularly advantageous for beamforming applications. The following prior art was considered by the USPTO examiner and is most relevant to the claims of the '866 patent.

Key Prior Art References

1. U.S. Patent No. 9,661,400 (Chabanne et al.)

- Full Citation: US 9,661,400 B2, "Method and a device for processing an audio signal captured by a microphone array," filed January 29, 2014; published May 23, 2017.
- Brief Description: This patent discloses a method for processing audio signals from a microphone array to create a directional capture. It involves applying a delay to the signals from different microphones before summing them....

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:

An analysis of the obviousness of U.S. Patent No. 10,651,866 ("the '866 patent") under 35 U.S.C. § 103 suggests that its claims may be vulnerable to an obviousness challenge, particularly when considering the combination of prior art references cited during its prosecution. The legal standard for obviousness requires determining whether the differences between the claimed invention and the prior art are such that the invention as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art (PHOSITA).

A PHOSITA in this context would be an electrical engineer or a related professional with experience in digital signal processing (DSP), specifically in audio applications, analog-to-digital conversion, and microphone array systems. Such a person would be familiar with oversampling techniques like Pulse Density Modulation (PDM), decimation filters (e.g., CIC filters), and the principles of delay-and-sum beamforming.

Obviousness Analysis Based on Prior Art Combinations

The primary argument for the obviousness of the '866 patent's...

4. Litigation History of the Patent

Public records reflect that the 10651866 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Luxottica OF America Inc et al. v. Solos Technology Ltd — 26-1721 · Court of Appeals for the Federal Circuit · filed 2026-04-22 · Open
- Solos Technology Limited v. Meta Platforms, Inc. et al. — 1:26-cv-10304 · United States District Court for the District of Massachusetts · filed 2026-01-23 · Active

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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