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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. 10664518 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10664518 (the "10664518 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**

A concise summary of US Patent 10,664,518, including details of recent legal challenges, is provided below.

Summary of U.S. Patent 10,664,518

Title: Wide area augmented reality location-based services

Assignee: The patent is assigned to Nant Holdings IP LLC.

Inventors: David Mckinnon, Kamil Wnuk, Jeremi Sudol, Matheen Siddiqui, John Wiacek, Bing Song, and Nicholas J. Withey are listed as the inventors.

Filing Date: The application for this patent was filed on October 23, 2018.

Issue Date: The patent was issued on May 26, 2020.

Abstract: The patent describes apparatuses, methods, and systems for providing Augmented Reality (AR) content. The technology involves obtaining an initial...

## **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 10664518 Patent:

Analysis of Prior Art for U.S. Patent 10,664,518

As a senior US patent analyst, the following is a technical analysis of the most relevant prior art

cited during the prosecution of U.S. Patent 10,664,518. This analysis examines each key reference, its teachings, and its potential impact on the patent's claims under 35 U.S.C. § 102 (novelty).

The references cited against patent 10,664,518 establish a foundational landscape for location-based services and content delivery. While they touch upon key components of the patented system, they were ultimately deemed by the examiner to not fully anticipate the specific combination of elements claimed. The core invention of the '518 patent is described as a multi-step process for managing and delivering AR content by creating a structured, hierarchical mapping of a physical space ("tessellated tiles"), linking these specific micro-locations to relevant AR content, and delivering that content based on a user's precise location and "view of interest."

Below is a breakdown of the key prior art and its relevance to the claims of U.S. Patent...

### **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:

As a senior US patent analyst, the following is a technical analysis of the obviousness of U.S. Patent 10,664,518 under 35 U.S.C. § 103, based on the provided prior art.

Obviousness Analysis of U.S. Patent 10,664,518

An invention is considered obvious under 35 U.S.C. § 103 if the differences between the invention and the prior art are such that the invention as a whole would have been obvious at the time it was made to a person having ordinary skill in the art (PHOSITA). In the context of this patent, a PHOSITA would be an individual with a degree in computer science or a related field, with practical experience in mobile application development, location-based services, and computer graphics, particularly augmented reality systems.

The core claims of the '518 patent describe a system for managing and delivering AR content by (1) dividing a map into "tessellated tiles," (2) associating those tiles with AR content, and (3) delivering the content based on a user's location within a tile and their specific "view of interest." While the prior art analysis concluded that no single...

### **4. Litigation History of the Patent**

Public records reflect that the 10664518 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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