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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. 10681946 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10681946 (the "10681946 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**

Here is a concise summary of US Patent 10,681,946.

Summary of US Patent 10,681,946

Title: Headband with protective insert

Assignee: Based on the information available, the patent is assigned to an "Individual."

Inventors: Shane Michael Johnston

Filing Date: September 17, 2018

Issue Date: June 16, 2020

Abstract: The patent describes a headband that includes one or more protective inserts. These inserts can be placed in strategic locations to protect specific areas of a person's head from impact. The inserts can be attached directly to the headband or placed within pouches that are attached to the headband. This protective headband can be worn by itself or underneath other headgear,...

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

Public records reflect that the 10681946 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Shane Michael Johnston v. Guardian Sports LLC — 1:26-cv-02211 · Georgia Northern District

### 3. 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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