

**SAMPLE — NOT LEGAL ADVICE.** This response letter was generated automatically from publicly available analysis. It has NOT been reviewed by a licensed attorney and SHOULD NOT BE SENT to any party without substantial review and customization by qualified patent counsel. Use as a starting point only.

[Your Name]

[Your Title]

[Your Company]

[Street Address, City, State ZIP]

June 1, 2026

[Opposing Counsel Name]

[Firm Name]

[Address]

**Re: U.S. Patent No. 10713672 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10713672 (the "10713672 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 10713672:

US Patent 10713672: Discovering neighborhood clusters and uses therefor

- Title: Discovering neighborhood clusters and uses therefor
- Assignee: Carnegie Mellon University
- Inventors: Justin Cranshaw, Raz Schwartz, Jason I. Hong, Norman Sadeh-Konieczpol
- Filing Date: December 18, 2017
- Issue Date: July 14, 2020
- Abstract: The patent describes computer-based systems and methods for identifying neighborhood clusters in a geographic area. These clusters are defined by a mix of venues and are determined using venue check-in data. The mix of venues can be based on social similarity between venues, characteristic neighborhood typologies,...

## **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 10713672 Patent:

To identify the most relevant prior art for US patent 10713672, I will examine the patent citations listed on the patent document itself. The patent document for US10713672B1 lists several "Prior

art documents" under the "Cited by" section on Google Patents. These include both patent documents and non-patent literature.

Here's an analysis of some of the most relevant prior art documents cited in US10713672:

1. U.S. Patent Application Publication No. 2011/0270634 A1 (Cranshaw et al.)

- Full Citation: US 2011/0270634 A1
- Publication/Filing Date: Publication: November 3, 2011. Filing: April 29, 2011.
- Brief Description: This patent application describes systems and methods for discovering activity patterns and common paths taken by users of a location-based social network. It focuses on identifying frequently traveled routes and associated activities based on check-in data. This could be relevant to understanding user movement and density in geographic areas.
- Potential Anticipation (35 U.S.C. § 102): This reference could potentially anticipate aspects of claims related to 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 US Patent 10713672 Under 35 U.S.C. § 103

This analysis identifies combinations of prior art references that would render the independent claims of US patent 10713672 obvious to a person having ordinary skill in the art (POSA) prior to the patent's earliest priority date of August 30, 2012. The analysis relies on the prior art references explicitly mentioned and incorporated by reference within the patent itself, along with general knowledge in related technical fields.

Independent Claims Overview

US Patent 10713672 B1 includes three independent claims:

- Claim 1: A computer-implemented method for identifying geographic clusters of venues based on venue check-in data, involving generating check-in intensity vectors for venues, creating a pairwise venue similarity matrix combining geographical and social distance (based on common visitors), and identifying clusters from this matrix.
- Claim 10: A computer-implemented method similar to Claim 1, but applied to geographic sub-regions (e.g., census tracts) rather than individual venues.
- Claim 17: A computer...

### **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]**

**DISCLAIMER.** This document is a machine-generated sample. The factual assertions, prior-art citations, and legal arguments above are AI-produced and may contain errors, omissions, or outdated information. Do not transmit this letter, in whole or in part, to any party. This is not legal advice; no attorney-client relationship is created by its existence. Consult a licensed patent attorney before responding to any patent-infringement assertion.

*Generated June 1, 2026 by [ihatepatentrolls.com](http://ihatepatentrolls.com) — sample only.*