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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. 10749859 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10749859 (the "10749859 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 10,749,859 is as follows:

Title: File format and platform for storage and verification of credentials

Assignee: Cortex MCP Inc

Inventor: Shaunt M. Sarkissian

Filing Date: May 24, 2019

Issue Date: August 18, 2020

Abstract:

The patent describes a computer-implemented method for generating and verifying officially verifiable electronic representations of user credentials. The method involves storing credential information, receiving a request to generate a file for user authentication based on this information, and creating a virtual representation of the credential that is verified by an issuing agency. The system then transmits this file and can later...

4. Litigation History of the Patent

Public records reflect that the 10749859 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Visa USA Inc v. Cortex MCP Inc — 26-1734 · Court of Appeals for the Federal Circuit · filed

2026-04-23 · Open

- Unified Patents v. Cortex MCP Inc. — IPR2024-00489 · Patent Trial and Appeal Board (PTAB) · Final Written Decision Issued
- Untitled case — 6:23-cv-00048 · U.S. District Court for the Western District of Texas · Active/Ongoing

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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