[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. 10758652 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10758652 (the "10758652 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

Summary of U.S. Patent 10,758,652
A comprehensive analysis of U.S. Patent 10,758,652 reveals the following details:
Title: System and method for collecting plasma.
Assignee: Haemonetics Corporation.
Inventor: Michael Ragusa.
Filing Date: May 30, 2017.
Issue Date: September 1, 2020.
Abstract:
The patent describes a method for collecting plasma from a donor. The process involves determining the donor's weight and hematocrit, then using a venous-access device to withdraw blood. This blood is directed to a blood component separation device where an anticoagulant is introduced. The device separates the blood into a plasma component and a second blood component. The plasma component is…

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 10758652 Patent:

Analysis of Prior Art for U.S. Patent 10,758,652
Based on a review of the prosecution history and the face of the patent, the following patents were cited as prior art during the examination of US 10,758,652. This analysis evaluates their potential relevance to the claims of the '652 patent.
Key Challenge of the Invention
The core novelty asserted in US 10,758,652 is the method and system for collecting a target volume of pure plasma by dynamically calculating and subtracting the volume of anticoagulant mixed with the collected plasma. This addresses the variability in collected "pure plasma" that arises from differences in donor hematocrit when collection is based on total fluid volume. Prior art systems, as described in the '652 patent's background, were "unable to determine the total volume of plasma that has been collected (e.g., because the product collected is a mixture of plasma and anticoagulant)" and therefore collected based on total volume, leading to inconsistent pure plasma yields (US 10,758,652, Col. 1, lines 60-67).
Analysis of Cited Prior Art
The following prior…

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 U.S. Patent 10,758,652 under 35 U.S.C. § 103
This analysis assesses whether the invention claimed in U.S. Patent 10,758,652 would have been obvious to a Person Having Ordinary Skill in the Art (POSA) at the time the invention was made (i.e., prior to the May 30, 2017 priority date). The analysis is based on the prior art references cited within the patent document itself.
A POSA in this context would be a biomedical engineer or a professional with substantial experience in the design and operation of apheresis and blood component separation systems.
Core Inventive Concept
The central inventive concept of US 10,758,652 is not the physical apparatus for apheresis, but rather the control method implemented by its controller. The patent's key contribution is a method and system that calculates the volume of pure plasma being collected in real-time by actively accounting for the volume of anticoagulant mixed with it. The collection process is terminated when a target volume of pure plasma is reached, rather than a target total volume of the…

4. Litigation History of the Patent

Public records reflect that the 10758652 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

• Haemonetics Corporation v. Terumo BCT, Inc. — 1:25-cv-01409 · United States District Court for the District of Colorado · filed 2025-05-05 · Ongoing

• Haemonetics Corporation v. Fresenius Kabi USA, LLC et al. — 1:25-cv-08680 · U.S. District Court for the Northern District of Illinois · filed 2025-07-25 · Active/Ongoing

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]