

**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]

May 14, 2026

[Opposing Counsel Name]

[Firm Name]

[Address]

**Re: U.S. Patent No. 10776023 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10776023 (the "10776023 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**

Based on the information from the initial search and the provided patent text, here is a summary of U.S. Patent No. 10,776,023.

U.S. Patent 10,776,023: Summary

- Title: Data storage device with configurable policy-based storage device behavior
- Assignee: Gaea LLC
- Inventors: Joshua Johnson, Curt Bruner, Jeffrey Reh, Christopher Squires, Brian Wilson
- Filing Date: November 6, 2017
- Issue Date: September 15, 2020
- Abstract: Aspects of the disclosure are related to data storage devices and in particular to data storage devices with configurable policy-based read and write behavior. A storage device is provided. A device controller with a memory is coupled with the storage device. The...

## **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 10776023 Patent:

Analysis of Prior Art Cited in U.S. Patent No. 10,776,023

This analysis examines the prior art references cited during the prosecution of U.S. Patent No.

10,776,023. Each reference is evaluated for its potential to anticipate the claims of the '023 patent under 35 U.S.C. § 102. The core invention of the '023 patent is a data storage device with a controller that uses a configurable "storage device policy" to manage how and where data is stored, and to control access and deletion based on that policy.

Independent Claim 1 of U.S. Patent No. 10,776,023

A method for a data storage device, comprising:

- Receiving, by a device controller of the data storage device, a storage device policy.
- In response to a storage request, storing content included in the storage request in a storage media of the data storage device in accordance with the storage device policy.
- Recording storage information for the content to a memory of the data storage device, wherein the storage information includes a content identifier for the content.
- In response to a retrieval request including the content...

### **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:

Analysis of Obviousness Under 35 U.S.C. § 103

Under United States patent law, a patent claim is invalid as obvious under 35 U.S.C. § 103 if the differences between the claimed invention and the prior art are such that the claimed invention as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art (a "POSITA"). An obviousness analysis often involves combining the teachings of multiple prior art references, but there must be a reasoned basis for a POSITA to have made such a combination.

The core of Independent Claim 1 of U.S. Patent 10,776,023 ('023 patent) is a data storage device whose internal controller can receive a "storage device policy" and use it to manage how data is written, read, and deleted, including storing metadata remotely.

Based on the cited prior art, the claims of the '023 patent appear to be vulnerable to an obviousness challenge by combining teachings from multiple references.

Primary Combination: U.S. 2012/0159085 A1 (LSI) in view of U.S. 9,489,204 B2 (NetApp)

A strong argument for obviousness can be...

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

Public records reflect that the 10776023 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Gaea LLC v. Meta Platforms, Inc. — 4:26-cv-00348 · U.S. District Court for the Northern District of Texas · active
- Gaea LLC v. Samsung Electronics Co., Ltd. et al. — 6:23-cv-00522 · U.S. District Court for the Western District of Texas · filed 2023-07-21 · active
- Gaea LLC v. Pure Storage, Inc. — 6:23-cv-00521 · U.S. District Court for the Western District of Texas · filed 2023-07-21 · active
- Gaea LLC v. Oracle Corporation — 6:23-cv-00520 · U.S. District Court for the Western District of Texas · filed 2023-07-21 · active
- Gaea LLC v. NetApp, Inc. — 6:23-cv-00519 · U.S. District Court for the Western District of

Texas · filed 2023-07-21 · active

• Gaea LLC v. Dell Technologies Inc. et al. — 6:23-cv-00518 · U.S. District Court for the Western District of Texas · filed 2023-07-21 · active

• Gaea LLC v. Hewlett Packard Enterprise Company — 6:23-cv-00517 · U.S. District Court for the Western District of Texas · filed 2023-07-21 · active

## 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]

**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 May 14, 2026 by ihatepatentrolls.com — sample only.*